

CONSTITUTION: Gloucester Stringbreakers Badminton Club



1. NAME

The club is called “Stringbreakers Badminton Club” and is affiliated to Badminton England.

2. AIMS AND OBJECTIVES

The aims and objectives of the club are:

- ✎ To offer the opportunity for adults of various abilities to play badminton.
- ✎ To promote badminton as a sport.
- ✎ To provide the opportunity for adults to improve their badminton skills and/or learn new skills.
- ✎ To encourage adults to engage in a positive social activity, promoting social interaction and a sense of belonging.
- ✎ To provide the opportunity for adults to experience the positive effect exercise has on their physical and mental health.
- ✎ To offer support to those lacking in confidence regarding their badminton skills and/or social skills.
- ✎ To offer competitive opportunities in badminton.
- ✎ To provide a duty of care and protection to all club members.
- ✎ To make sure all club members are treated fairly and with respect.



3. MEMBERSHIP

The Stringbreakers club year runs from 1st September to 31st August (except in exceptional circumstances and fees are adjusted as necessary).

Fees are based on the number of available sessions per year and members can attend as often as they want. There are dates when Stringbreakers do not meet due to hall availability and this includes most bank holidays and the 2 week Christmas break. The venues are sometimes unavailable on other dates and the details are provided clearly in the new club year registration email (and on the website). If any sessions are cancelled unexpectedly then a refund will be calculated and given to members at the end of the club year.

Membership of the club is open to anyone aged 18+ who is interested in badminton regardless of sex, age, disability, ethnicity, nationality, sexual orientation, religion or other beliefs. All members must complete an annual registration form.

The club will have an equitable pricing policy, aiming to keep subscriptions at a price that will not pose a significant obstacle to people participating whilst still covering all club costs. Membership options, prices and payment methods will be made clear to all members, to those making enquiries and will also be clearly displayed in the Welcome Pack and on the website.

Players new to the club can attend as a 'guest' for a maximum of two free sessions before becoming members.

Members who choose to join the club will be full members, the membership details and fees are as follows:



Full Membership

The Full Membership Fee covers club night sessions for the club year and includes the Club Player Registration Fee.

New members joining after the beginning of the club year (1st September) will be advised of the appropriate fees. The Full membership allows members to attend all sessions, this includes Monday and Friday sessions

If a new member joins the club after the AGM (usually May/June), they are not required to pay the registration fees for that club year (ending 31st August)

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All members will be subject to the regulations of the constitution and by joining the club will be deemed to have accepted these regulations and codes of practice which the club has adopted.

Any club members must be over the age of 18.

4. MEMBERSHIP FEES

Membership fees will be set annually by the Management Committee and will be announced a month or so before the new club year starts.

Fees must either be paid in full by the start of the club year (1st September), or in quarterly payments (1st September, 1st December, 1st March & 1st June).

5. OFFICERS OF THE CLUB

The officers of the club are:

- ✋ Chairperson
- ✋ Secretary
- ✋ Treasurer
- ✋ Welfare Officer

Role Descriptions can be found in Appendix 1.

Officers will be elected annually at the Annual General Meeting. All officers will retire each year but will be eligible for re-appointment.

Not all of the Management Committee need to have a specific role. Some officers and committee members will take on specific responsibilities e.g. Website Management, Data Protection, First Aid Kit Management, Public Relations (PR), Social Secretary and so on.

All committee members are expected to take on the role of Session Co-ordinator unless there are reasons why this is not appropriate (see role description in appendix 1).



6. MANAGEMENT COMMITTEE

The club will be managed by the Management Committee:

- ✋ All Management Committee Members will have the right to vote at meetings of the Management Committee.
- ✋ The Management Committee will be convened by the Secretary of the club and held no less than three times a year.
- ✋ The quorum required for business to be agreed at Management Committee meetings will be three (and should never be less than half of the total number of committee members except in exceptional circumstances).
- ✋ The Management Committee will be responsible for adopting new policies, codes of practice and rules.
- ✋ The Management Committee will have powers to appoint sub-committees and working groups as necessary and appoint advisers to the Management Committee as required to fulfil its business.
- ✋ The Management Committee will be responsible for disciplinary hearings of members who infringe the club rules/regulations/constitution. The Management Committee will be responsible for taking any action of suspension or discipline following such hearings which will be conducted in accordance with the Badminton England Disciplinary Regulations.
- ✋ The club must evidence that at least three of the people on the committee are not related or cohabiting.

7. CONFLICTS OF INTEREST

The Committee accept their responsibility in acknowledging potential conflicts of interest. All decisions made must be in the best interest of the club and its members.



8. FINANCE

- ✎ All club monies will be banked in an account held in the name of the club. The Club Committee will be responsible for the finances of the club which will be managed by the Treasurer and overseen by the Chairperson.
- ✎ The financial year of the club will end on 5th April (despite the club annual year ending on 31st August).
- ✎ An audited statement of annual accounts will be presented by the Treasurer at the Annual General Meeting.
- ✎ Audited accounts do not need to be reviewed by an external independent examiner. They will be reviewed and closely monitored throughout the year by the club chairperson.
- ✎ Any cheques drawn against club funds will hold the signatures of the Treasurer plus up to two other officers. Where online payments are made, arrangements should be such that another committee member is aware of and agrees the transactions.

9. ANNUAL AND EXTRAORDINARY GENERAL MEETINGS

- ✎ Notice of Annual General Meetings will be given by the Club Secretary. Notice of no less than 21 clear days is to be given to all members. The notice of AGM will be communicated via email to all voting members.
- ✎ The AGM will receive a report from the Chairperson, from the Treasurer including a statement of the annual accounts and from the team captains.
- ✎ Nominations for officers of the Management Committee should be sent to the Secretary prior to the AGM.
- ✎ Elections of officers are to take place at the AGM.
- ✎ All club members have the right to vote at the AGM.
- ✎ The quorum for AGMs will be 8.
- ✎ The Management Committee has the right to call Extraordinary General Meetings (EGMs) outside the AGM. Procedures for EGMs will be the same as for the AGM.
- ✎ Members of the Club have the right to call an EGM if at least 50% of the membership call for it. This must be communicated to the club with 21 day's notice.

10. LEAGUE

Stringbreakers Badminton Club aim to enter teams into the 'Gloucestershire Badminton League' whenever there is enough interest from those who display league level skills.

- 👉 Team members are representing Stringbreakers Badminton Club during home and away matches so they are expected to follow the club's rules and Code of Conduct. They should show respect towards their fellow team members and opponents at all times, interacting appropriately with them. They should also avoid displays of frustration and agitation in respect to their own ability or that of their fellow team members and opponents.
- 👉 Team Captains are allocated by the committee. The team captains must liaise with the committee regarding how they plan to manage their team and who they choose to be in the team. Team Captains are expected to write a short team report for each Annual General Meeting.
- 👉 Once the team players have been chosen by the team captain, the main players can not later be replaced in the matches they have been allocated, due to a better player joining the club/expressing an interest to play in the team. This can happen if the relevant team member(s) feels it is in the best interest of the team and readily offers to give up some/all of their games for the new player.
- 👉 Every team must have aim to have at least 1 reserve (or 1 extra team member) when entering the league. In the mixed team this must be 1 extra man AND 1 extra lady. Teams should ideally have at least 2 reserves (or 2 extra team members). Teams can be entered with no reserves but this should be avoided as it is very likely to be highly impractical and puts too much pressure on the team members regarding availability including poor health/injury.

11. EQUALITY POLICY STATEMENT

This club is committed to ensuring that equality and diversity is incorporated across all aspects of its development:

- 👉 The club respects the rights, dignity and worth of every person and will treat everyone equally and fairly, regardless of age, ability, gender, race, ethnicity, religious belief, sexuality or social/economic status.
- 👉 The club believes everyone has the right to enjoy badminton in an environment free from threat of intimidation, harassment and abuse.
- 👉 All club members have a responsibility to challenge discriminatory behaviour and promote equality and diversity.
- 👉 Any incidents of discriminatory behaviour will be responded to swiftly and action taken according to our Disciplinary Procedures.



Disability Pledge

- 👉 Badminton England believes that badminton is a sport for all, and encourages all clubs to support disabled people who want to enjoy playing, coaching or volunteering in their club.
- 👉 We, Stringbreakers Badminton Club, believe that badminton is a sport for all, and pledge to make all reasonable efforts to provide opportunities for and work with disabled people who want to enjoy playing, coaching or volunteering in our club. We will ensure that all of our members and guests are treated with respect at all times.

12. SAFEGUARDING YOUNG PEOPLE & VULNERABLE ADULTS

This policy statement demonstrates the importance that this club places on the protection of young people who are involved with Stringbreakers Badminton Club, any young people who are not known to the club who may enter the hall during a Stringbreakers Session and any adults in the club who are vulnerable.

The club will:

- 👉 Adopt Badminton England's Safeguarding and Protecting Young People in Badminton Policy and procedures and is working to the Safeguarding Best Practice guidelines.
- 👉 Appoint a Welfare Officer who has attended recognised child protection training.
- 👉 Respect and promote the rights, wishes and feelings of vulnerable adults.
- 👉 Require all members and visitors to abide by the club's Codes of Conduct.
- 👉 Respond to all incidents of suspicious poor practice and allegations, swiftly and appropriately.
- 👉 Ensure that allegations, incidents and poor practice are reported to the Club Welfare Officer.
- 👉 Ensure that all allegations and incidents are documenting appropriately.

A full copy of the Badminton England's Safeguarding & Protecting Young People Policy and Guidelines document is available from Badminton England or can be downloaded from the website www.badmintonengland.co.uk



13. CODES OF PRACTICE

Club Officials, Committee Members and Volunteers must:

- 🚫 Prioritise the well-being and safety of participants over the development of performance.
- 🚫 Develop an appropriate working relationship with participants, based on mutual trust and respect.
- 🚫 Make sure all activities are appropriate to the age, ability and experience of those taking part.
- 🚫 Promote the positive aspects of badminton including fair play.
- 🚫 Display consistently high standards of behaviour and appearance.
- 🚫 Follow all safeguarding and best practice guidelines laid down by Badminton England and the club.
- 🚫 Never exert undue influence over performers to obtain personal benefit or reward.
- 🚫 Never condone rule violations, rough play or the use of prohibited substances.
- 🚫 Encourage participants to value their performances not just results.
- 🚫 Encourage and guide participants to accept responsibility for their own performance and behaviour.
- 🚫 Never use social media or any other electronic platforms/tools to publicly criticise any other players or the club in any way.
- 🚫 Never bring the sport or the club into disrepute through inappropriate communications.

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All Club Members and Guests Must:

- ✋ Adhere to all of the club's rules as outlined in the constitution.
- ✋ Behave appropriately during sessions including not using offensive language or aggressive behaviour.
- ✋ Show respect towards each other at all times.
- ✋ Follow instruction from those who hold roles within the club.
- ✋ Play fairly on and off court.
- ✋ Support each other, especially those of different abilities, offering helpful tips as appropriate whilst never giving negative criticism or making it evident that they are frustrated with anyone due to ability.
- ✋ Report any accidents or incidents which the club officials may not be aware of.
- ✋ Report any safeguarding issues to the club's Welfare Officer.
- ✋ Ensure that they register and make their payments within the given time scales.
- ✋ Wear clothing and footwear which is appropriate for playing badminton in order to keep them safe and protect the sports hall flooring.

14. FIRST AID

- ✋ The venue usually have emergency first equipment and qualified staff on the premises. The venue's first aid team will take full responsibility for the first aid provided once they are present.
- ✋ SB players should generally wait for the venue's first aid team to attend rather than offering practical first aid help, but they are able to offer urgent / life-saving intervention before the staff arrive if necessary.
- ✋ If it is felt that an ambulance should be called then this should be done as the priority at the same time as the venue's first aid staff are phoned to assist.
- ✋ The "Stringbreakers First Aid Statement" can be found Appendix 2.

15. RISK ASSESSMENTS

- ✋ The 'General Stringbreakers Club Risk Assessment' can be found in Appendix 3 and is relevant for all club sessions and home matches.
- ✋ There may be exceptional situations where additional risk assessments are required (e.g. Covid Risk Assessment or Badminton England Safeguarding Risk Assessments).

16. ACCIDENT & INCIDENT REPORTING

- ✋ The 'Accident & Incident Report Form' can be found in Appendix 4
- ✋ An 'Accident & Incident Form' must be completed whenever there are any accidents or incidents during a Stringbreakers Badminton Club Session, including league matches at home. If the Session Co-ordinator feels the accident or incident was too minor to require a form then they must seek advice from other committee members and ensure the Club Chairperson is made fully aware.
- ✋ If the venue's first aid team were involved then the Stringbreakers Accident & Incident form does not need to detail any work they carried out but should mention when the responsibility was handed over to them.
- ✋ For safeguarding incidents and disclosures, the Welfare Officer should write the incident report in collaboration with all of those who were involved in the incident/conversation.

17. GENERAL DATA PROTECTION REGULATION (GPDR)

- ✋ Stringbreakers are adhering to the Badminton England GDPR Documents (Privacy Notice, GDPR Policy, Data Breach Notice) and these can be found in Appendix 5
- ✋ Members are asked to register using a secure on-line booking form which only the management committee are able to access. No paper copies of registration documents are stored. On-line registration details will be deleted at the end of every club year.
- ✋ The club secretary stores email contacts for all members.
- ✋ Any confidential information is stored on the club secretary's home PC which requires a password to access.

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- ✎ As part of the registration process members are asked to tick a box saying “I have read the 'Stringbreakers Privacy Notice' and I agree for the Stringbreakers Committee to safely hold my details for the sole purposes of sending me information specifically relevant to the Stringbreakers Badminton Club, for use in emergency situations and to be passed on to 'Badminton England' for reasons outlined in the Privacy Notice”.

18. DISCIPLINARY & APPEALS

- ✎ All complaints regarding the behaviour of members should be presented and submitted in writing to the Club Secretary (or Chairperson if the complaint involves the Secretary).
- ✎ The club will follow the best practice guidelines in dealing with disciplinary issues as laid down in the Badminton England Disciplinary Regulations.

19. DISSOLUTION

- ✎ A resolution to dissolve the club can only be passed at an AGM or EGM through a majority vote of the membership.
- ✎ In the event of dissolution, any assets of the club that remain will become the property of Badminton England or some other badminton club with similar objectives to those of the club.

20. AMENDMENTS TO THE CONSTITUTION

- ✎ The constitution will only be changed through agreement by the committee (a majority vote is required) and then any additions or amendments will be shared with the club at the AGM.



21. DECLARATION

Stringbreakers Badminton Club hereby adopts and accepts this constitution as a current operating guide regulating the actions of members

SIGNED: *Pam Klus*

NAME: Pam Klus *

DATE: 27.08.23

POSITION: Club Chairperson

SIGNED: *Ben Warren*

NAME: Ben Warren *

DATE: 27.08.23

POSITION: Club Secretary

*Signed electronically



APPENDIX 1

ROLE DESCRIPTIONS

Chairperson

- ✋ Act as principal officer throughout the year overseeing the smooth, safe and effective running of the club in adherence with the club's constitution, policies and procedures, risk assessments and general ethos.
- ✋ Ensure the smooth functioning of the Management Committee. Chair the committee meetings and AGM.
- ✋ Make decisions whenever the need arises in consultation with other committee members. Make the final decision when an obvious conclusion has not been reached/agreed on.
- ✋ Work closely with the secretary. When unable to involve the full committee in decision making always aim to involve the secretary.
- ✋ Ensure committee members are comfortable in their roles, are aware of what is expected and are fulfilling their responsibilities. Offer support as necessary.
- ✋ Be fully aware of the systems the treasurer is using so there is a full awareness of how the club finances are managed if the need ever arose unexpectedly.
- ✋ Oversee the finances at least twice a year. Meet with the treasurer at the end of every club year to sign off the financial report in the absence of requiring an external auditor.
- ✋ Liaise with the Welfare Officer as appropriate regarding safeguarding issues and ensure they are fully supported and equipped to manage complex and emotionally demanding situations.
- ✋ Ensure that accident and incident forms, including safeguarding disclosures and incidents, are always documented thoroughly and stored safely.
- ✋ Take on the role as Session Co-ordinator (person in charge) whenever present and ensure that sessions are being run safely, effectively and fairly in your absence.
- ✋ Be responsible for ensuring that the kit bag is taken to and from every session.
- ✋ Take a lead when conflict resolution is required.

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Secretary

- ✎ Support the Chair in ensuring the smooth functioning of the Management Committee and of the club.
- ✎ Ensure deadlines are met (e.g. enough notice given re AGM, ensure teams are submitted to the league etc).
- ✎ Ensure meetings are effectively organised and minuted.
- ✎ Maintain effective records and administration.
- ✎ Communicate information via email to club members (& facebook).
- ✎ Ensure that the website is kept up to date by liaising with the web manager.
- ✎ Compile official documents, with the committee agreeing to the final draft before they are published, and ensure they are always kept up to date.
- ✎ Organise the AGM.
- ✎ Liaise with the league as necessary.
- ✎ Ensure league team captains are fully supported and are running their teams effectively and fairly.
- ✎ Liaise with sport hall staff as necessary.

Treasurer

- ✎ To manage the finances of the club.
- ✎ To check the account regularly to make sure membership and session fees are being paid by members.
- ✎ To make sure that any cash received from sessions is deposited into the club bank account as soon as possible.
- ✎ To arrange payments for club resources, including but not limited to: court time, equipment, club kit, and registration with BE and the county badminton association - for individual members and for the club as a whole.
- ✎ To allocate the budget for club resources and activities for each club year. This must be discussed and agreed on by the committee.
- ✎ To set the membership fee amounts based on the expected membership uptake and session attendance throughout the club year, and taking into account the club budget and any surplus funds remaining from the previous club year. This must be discussed and agreed on by the committee.

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Welfare Officer

- ✋ To ensure that Badminton England's Safeguarding Policy and Procedures work in practice.
- ✋ To assist Badminton England to fulfil its responsibilities to safeguard children and young people at club level.
- ✋ To act as the first point of contact for coaches, volunteers, parents and children/young people in badminton where concerns about children's welfare, poor practice or child abuse are identified, and to pass these concerns on to the appropriate person or organisation.
- ✋ To be the first point of contact with the Badminton England Lead Child Protection Officer.
- ✋ To implement Badminton England's reporting and recording procedures.
- ✋ To maintain contact details for local Social Services and the Police and know how to obtain Local Authority Designated Officer details.
- ✋ To promote Badminton England's Safeguarding Best Practice Guidelines and Codes of Ethics and Conduct within the club.
- ✋ To sit on the Club Committee and attend club meetings.
- ✋ To facilitate the Disclosure and Barring Service process within the club, including being a DBS document verifier.
- ✋ To promote and ensure adherence to Badminton England's safeguarding training plan which includes receiving appropriate training for the club role as directed by Badminton England and addressing the safeguarding training needs of other adults in the club.
- ✋ To register with Badminton England as a Welfare Officer in order to receive updates and relevant information direct from the governing body.
- ✋ To promote and ensure confidentiality is maintained.
- ✋ To have a commitment to, and promote equality and diversity.

Session Coordinator

The aim is to always have a member of the committee at each of the sessions, who will act as the Session Coordinator, including home matches except in exceptional circumstances. There may be times where a member of the committee isn't able to attend, in this instance we will ask one of our regular players to stand in. Whenever possible it's good practice on a match night for this role to be taken on by someone who isn't paying in the league match.

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There is a full document listing what is expected of a Stringbreakers Session Coordinator for those taking on the role. The full Role Description contains all of the information below but also some additional information including committee member's contact details.

The Session Coordinator (SC):

- ✋ Is the main person responsible for the club during the session ensuring that it runs smoothly and safely.
- ✋ Ensures that the session runs in line with this Session Coordinator Role Description Document, the Stringbreakers Constitution, Risk Assessments & the club's general ethos.
- ✋ Ensures that everyone receives a warm welcome, especially new players as they arrive for the first time, and makes sure that all players treat each other fairly and respectfully.
- ✋ Should ideally be a member of the committee, although reserves can be used when the committee are unavailable. Reserves must be chosen by the committee and fully briefed.
- ✋ Must communicate effectively with the committee after a session if any issues have arisen.

A Designated Session Coordinator must :

1. Read and ensure they fully understand the Stringbreakers :
 - i. Session Coordinator's Role Description.
 - ii. Constitution including the Risk Assessment in the appendix.
 - iii. Full Membership and guest attendance process.
2. Contact the rest of the committee straight away if they are a committee member who can no longer make a session they have been allocated as SC.
3. Inform a member of the committee immediately (ideally Club Secretary/Chairperson) if they are a reserve SC and can no longer make a session they have been allocated as SC.
4. Ensure they have access to all of the phone numbers listed in the SC Role document with them during a session.
5. Ensure they have shuttles and access to the register.



6. Arrive on time (ideally early so they are the first in the hall).
7. Observe that the environment is practical and safe e.g. no trip hazards, no obstacles blocking free flow of shuttles, appropriate lighting and heating etc. If there are any concerns the SC must contact the venue staff.
8. Ensure that the benches/chairs are available in the correct places.
9. Ensure all the required nets are put up before play commences. Ensure all the required nets are up before play commences. Offer advice and practical help to anyone who is not experienced with putting up nets.
10. Ensure that players are signing in before they start playing.
11. Give a warm welcome to anyone who is arriving for the first time, explain how things work and ask them for their email address so we can send them information about the club.
12. Ensure that equipment is being used properly and safely.
13. Ensure that the court selection system is being used fairly and effectively (e.g. Peg Board).
14. Explain to those displaying behaviour or language which does not fit the club's ethos that it is not acceptable and if it continues they will be asked to leave.
15. Be aware of how members are treating each other and intervene if necessary. Ensure less experienced players are fully supported. Share all concerns with the committee.
16. Ask anyone under 18 who enters the hall on a club night to leave immediately (even if this means the SC has to walk off court during the middle of a game). Politely explain that we have a strict 18+ only rule for safeguarding reasons. If they have specific enquiries then refer them to the website where they will find our email address.
17. Contact the venue's staff for all first aid assistance. Players can help themselves to items from our First Aid box. Individuals can offer first aid assistance if they choose to but as a club we are unable to offer practical help in an official capacity except for during life threatening situations.

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18. Use other players to help and support if useful/required. E.g. if someone has a louder voice or more experience of managing groups/conflict then the SC might want to utilise those skills by asking them to help. All Session Coordinators present should work together, each helping out with every aspect of this role and supporting each other.
19. Loudly provide a 5 minute warning 10 minutes before the end of the session.
20. Clearly and firmly state that the session has ended, and play must stop, 5 minutes before the end of the session.
21. Remind everyone to make sure they take all their belongs with them.
22. Ensure all SB players are out of the hall by the finish time.
23. Ensure they are the last to leave the hall at the end of a session checking that all nets are down (as appropriate) and that checking that all nets are down and that items have been returned to the kit bag. The bag must not be left at the venue.
24. Check to ensure the attendance sheet is an accurate account of who attended the session.
25. Report to the Club Chairperson or Secretary any concerns you have regarding general safety, the running of the session or any incidents and give the club secretary any new players' contact details.
26. Report to the Welfare Officer if they have any safeguarding concerns.
27. Write up a report if there were any accidents or incidents. Please contact The Club Secretary for advice about writing accident or incident reports. For safeguarding incidents The Welfare Officer will help with report writing. Please ALWAYS write rough notes IMMEDIATELY after any incident, logging exactly what happened, when, how and who was involved. This ensures the final report will provide the most accurate account.



APPENDIX 2

FIRST AID STATEMENT

- 👉 Stringbreakers play at two venues (University of Glos Oxstalls Campus & Quedgeley Health & Fitness) and they both have emergency first aid equipment and members of staff qualified in first aid.
- 👉 Stringbreakers do not have any designated club first aiders and are not responsible for any help or assistance provided by players in a non club capacity.
- 👉 If there is an accident/incident where first aid is required which can't be self administered, Stringbreakers will call the first aid staff. Stringbreakers players should refrain from offering practical first aid assistance whilst waiting for the staff to arrive unless it is crucial / life threatening.
- 👉 If an ambulance is required then that phone call should be the priority. Venue staff should be called at the same time or immediately afterwards.
- 👉 There may be occasions when unforeseen circumstances mean that there are no first aid trained staff on site. In this situation Stringbreakers club WILL NOT provide first aid help other than offering the first aid kit. They WILL ensure that either an ambulance is called or that the injured individual is able to get home or to hospital safely. Stringbreakers club won't stop anyone present from taking the initiative to provide basic assistance and advice or life saving help to the injured player.



APPENDIX 3

GENERAL RISK ASSESSMENT

Session:	Stringbreakers Badminton Club Sessions & Matches	Date Completed:	02.10.21
Venue:	University of Gloucestershire Oxstalls Campus AND Quedgeley Health and Fitness Club	Completed by:	Name (Secretary)
Abbreviations:	SB = Stringbreakers; SC = Session Co-ordinator; BE = Badminton England; RA = Risk Assessment	Signed & dated	Signature date
Session Co-ordinator:	A club member who has been allocated the role of being in charge (<i>see SC role description</i>)	Agreed by:	Name (Chairperson)
Risk Assessments :	Specialist Risk Assessment (e.g. Covid or Safeguarding) may be used in collaboration with this one	Signed & dated	Signature date

Hazard	Who is at risk?	What are the Potential Outcomes?
<p>Risk of incident or accident leading to:</p> <ul style="list-style-type: none"> - injury - aggravation of an existing injury - feeling unwell - a flare of an existing health condition - a medical emergency 	<p>Players</p> <p>Whenever “players” is mentioned in this RA it means everyone attending a SB session.</p> <p>That includes:</p> <ul style="list-style-type: none"> - committee volunteers - guests new to the club - visiting members from other clubs on match nights 	<p>A player could.....</p> <ul style="list-style-type: none"> • incur an accidental injury caused by themselves. For example they could get blisters, muscle cramps, have a fall, sprain an ankle, tear ligaments, pull muscles, break bones, get friction burns, hit self with racket, be bruised, have concussion due to collision with walls and objects, become dehydrated etc. • incur an accidental injury (such as those listed above) caused by someone else. For example as a result of a collision with another’s racket, collision with another player, bruising or damaged eye from a shuttlecock etc. • aggravate an existing injury or have a flare of a known health condition such as asthma, heart issues, epilepsy, mental health conditions etc. • experience an unexpected health issue or medical emergency during a session. For example dizziness, exhaustion, neuro issues such as extreme confusion or numbness, mental health issues, stroke, cardiac arrest, convulsions etc. • be vulnerable and need safeguarding. • be psychologically or physically harmed due to bullying, verbal/physical abuse or sexual misconduct.



		<p>This Risk Assessment</p> <ul style="list-style-type: none"> ○ provides <u>measures</u> which must be put in place in order to do all that is possible to avoid accidents and incidents. ○ lists the <u>actions</u> which must be taken when responding to an accident or incident.
Hazard / Issue	Who is at risk?	Action
Condition of Sports Hall	Players	<ul style="list-style-type: none"> ● The venue are responsible for ensuring that the external access from the car park to the sports hall building, and the internal access into the actual hall, are safe and hazard free. ● The venue are responsible for ensuring that the hall is fully functional and safe ready for our arrival. ● The venue are responsible for ensuring SB are contacted as soon as possible if there are any areas of the sports hall building which are unusually out of bounds. If so then SB Committee will assess whether it is practical and safe for the session to go ahead. ● The Session Coordinator should be the first to arrive in the sports hall and must assess the environment looking at trip hazards, slip hazards, temperature, obstructions such as equipment overhanging or too close to a court etc. ● The SC must assess whether they can easily correct a hazard (e.g. wiping up a spill or moving a bench) or whether they need to call the venue's staff to assist. SB players should never attempt to move a hazard which could put themselves at risk, e.g. something too heavy to lift. ● If any mess is made during the session (e.g. spillage) then the person responsible should clear it up and the SC should ensure the environment is safe before play recommences. ● SC to ensure that the environment remains safe throughout the session. E.g. if rain is blowing in through a door then ensure the door is closed and the wet surface is dried.
Use of equipment during session	Players	<ul style="list-style-type: none"> ● SC to ensure that SB Club equipment is used safely and respectfully during the session and put away carefully at the end of the session to avoid damage. ● SC to ensure that players treat the sports hall and the venue's equipment with respect and use it in a safe manner. ● SC to intervene if anyone is potentially causing damage or posing any risk regarding the use of equipment (and/or discuss with committee)



Clothing	Players	<ul style="list-style-type: none"> • Players are expected to wear clothing which is suitable for cardiovascular exercise. They should not wear clothes which could cause overheating or trip them up. Overly revealing/particularly offensive clothing should also be avoided. • Appropriate footwear must be worn which is safe to play badminton in and which will not damage the sports hall floor (i.e. trainers must be worn. Ideally proper trainers rather than unsupportive canvas pumps. Dress shoes, open toe shoes, slip-ons and so on are not allowed). • SC to communicate with a player if they are not wearing the appropriate clothing or footwear and SC to decide whether they feel it's safe for them to continue to play on this occasion only or to ask them to leave the session.
Alcohol and drugs	Players	<ul style="list-style-type: none"> • Players must not attend a session if they are under the influence of alcohol or drugs. If there is evidence of this then they will be asked to leave the session.
Dehydration	Players	<ul style="list-style-type: none"> • Players are encouraged to bring drinks with them and use the venue's water stations if available.
Underlying medical conditions and existing injuries	Players with underlying health conditions, those taking medication and those with existing injuries	<ul style="list-style-type: none"> • Players are responsible for their own management of their health conditions, medication management and existing injuries. • Players are encouraged to provide information about any relevant health conditions or medications they are taking when they register, although it is made clear that this is not mandatory. This information can be really useful to the SB Committee. For example if a player has epilepsy then they may have explained (verbally and in writing) what to expect when they have a fit and have clearly informed you of when and when not to call an ambulance. • Any information they have provided has be done with the full knowledge that it will be passed onto first aid staff and or ambulance/hospital staff in an emergency.
First Aid	Players	<ul style="list-style-type: none"> • SC to direct participants to head home if they are clearly not well enough to be playing. • SC to contact the venue's First Aid Team if there are any bodily fluids to clean up. • SC to call the venue's First Aid Team for assistance if there are any issues which can't be self-treated. • If it is felt that an ambulance should be called then this should be done as the priority and the venue's First Aid Team should be phoned at the same time. • SB players should generally wait for the venue's first aid staff rather than offering practical first aid help, but they are able to offer life saving intervention before the venue's staff arrive if necessary. • The venue's First Aid Team will take full responsibility for the first aid provided once they are present. SC and players are to follow their instructions. The venue are fully responsible for their first aiders to be appropriately trained.

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		<ul style="list-style-type: none"> • SC must complete an accident report with the assistance of other committee members if useful, ensuring they have all the information necessary from anyone involved. They should write rough notes immediately after the event about what happened, where, when, why and who was involved. • The venue's First Aid Team are likely to need to write their own accident report, in which case the SB Committee and the venue's First Aid Team should liaise.
Vulnerable Players	<p>Players who are vulnerable for reasons such as :</p> <ul style="list-style-type: none"> - mental health conditions including autism or anxiety; - a learning disability; - safeguarding issues. 	<ul style="list-style-type: none"> • A vulnerability may have been disclosed to the committee verbally or via the registration form or it may have been observed by other players. • The Welfare Officer will sensitively approach the individual to ask them how they feel the club can support them (ensuring that the committee are fully aware that this has happened or is going to happen). In some situations it may be appropriate to communicate with the player's parent/carer instead or as well. • SB is an adult only club. Under 18s are occasionally able to play on a non-club night but ONLY with an agreed adult escort and this must always be pre-arranged by the committee. • <i>Please see the Safeguarding Section of the Club Constitution.</i>
Anger	<p>Players with anger management issues</p>	<ul style="list-style-type: none"> • If any player displays anger management issues in respect to their own ability/performance, then the committee will address this with them and look at ways to help them manage it. • If this anger is upsetting other players and impacts on the session then the individual might be asked to leave, although everything will be done to support them in order to avoid that happening. • If a player is clearly displaying frustration due to another player's ability then the committee need to ascertain whether they should address this immediately or contact that individual after the session. They will sensitively explain that the club does not tolerate that kind of behaviour. They may also chose to have a quiet word of support to the other player. • Anger leading to disrespecting other players, violence, damage to property or harm to other players <u>will not be tolerated.</u> <p>The committee should deal with this at the time by using appropriate action including asking the player to leave immediately if anyone is at risk. They should then contact the individual soon after the incident to explain that this</p>

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		<p>behaviour is not acceptable. The committee will to decide whether this player needs to be banned or given another chance according to the severity of the behaviour. The committee may seek BE advice on this.</p> <p>If the individual won't leave the session and there is the risk of harm to themselves, others or damage to property, then the SC must phone the police and ask all other players to leave the hall immediately and head to a safe place.</p>
Travelling to and from sessions and matches	Players	<ul style="list-style-type: none"> The SB session starts when players enter the hall and finishes when they leave. SB are not in any way responsible for the welfare of players as they travel to and from sessions or matches.
Away matches and tournaments	League team and competition players and observers	<ul style="list-style-type: none"> The match hosts are responsible for first aid provision and the general safety and well-being of all players including visiting players during match nights at their club.
Social events	Players	<ul style="list-style-type: none"> SB are in no way responsible for the behaviour or safety of individuals on a club social event. SB committee may choose to contact the parent/carer of a vulnerable player in advance to seek advice about the appropriateness of them attending the social. They must make it clear that they are not responsible for that individual during the social event.
Fire	Players	<ul style="list-style-type: none"> SC to instruct all players to leave the sports hall in the event of a fire and/or the fire alarm ringing. They must leave the hall via the fire escape closest to them and head to the safety point as quickly and calmly as possible without running. SC to be the last to leave the hall ensuring that all players have left the hall. SC to use the register once in a safe place to ensure all SB players are out of the building and inform the venue's staff if anyone is missing.
Reporting of accidents and incidents	SB Session Co-ordinators SB Welfare Officer	<ul style="list-style-type: none"> Accident and incident reports should be written when anything out of the ordinary occurs. If it is difficult to decide whether a report is required or not then the SC should contact the committee so they can make that decision together.

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		<ul style="list-style-type: none">• A report isn't required for minor incidents where there are unlikely to be any consequences of any significance (e.g. if someone breaks a nail, uses a plaster for a very minor cut, has a minor incident where they were hit by a shuttle or tapped lightly on the head by a racket with no sustained consequences and are able to continue playing.• A report is required if there is a collision which results in someone feeling dizzy or in pain, if someone's eye is clearly hurt from a shuttlecock accident, if someone has been aggressive towards others, if there is a serious injury requiring First Aid assistance, if hospital treatment is required, if someone has convulsions/epileptic fit, if an ambulance is called etc.• Reports are to be stored by the club secretary for many years after the accident/incident. Committee can seek BE guidance if they aren't sure whether any further action is required.
Insurance	SB Club	<ul style="list-style-type: none">• SB club are affiliated to Badminton England and are covered by their insurance.



APPENDIX 4

Stringbreakers Accident & Incident Form

INCIDENT/ACCIDENT REPORT FORM GLOUCESTER STRINGBREAKERS BADMINTON CLUB



Name of person in charge of session/competition

Site where incident/accident took place

Date of incident/accident

Name of injured person

Address of injured person

Nature of incident/injury and extent of injury

INCIDENT/ACCIDENT REPORT FORM GLOUCESTER STRINGBREAKERS BADMINTON CLUB



Give details of how and precisely where the incident took place.
Describe what activity was taking place, for example training/game/getting changed.

Give full details of action taken including / during any first aid treatment and the name(s) of first aider(s).

Were any of the following contacted?

- Parents/carers Yes No
- Police Yes No
- Ambulance Yes No

What happened to the injured person following the incident/accident?
e.g. carried on with session, went home, went to hospital etc.

All of the above facts are a true record of the accident/incident

Signed:

Date:

Name:



APPENDIX 5

Stringbreakers Badminton Club and its volunteers are adopting these following three Data Protection Documents from BE in their entirety, and agree to abide by all guidelines and legal requirements as outlined →

PRIVACY NOTICE

1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe.

There is a lot of information here but we want you to be fully informed about your rights, and how Stringbreakers Badminton Club, Gloucester uses your data. For example, we will explain how we combine data across Stringbreakers Badminton Club, Gloucester to build a single view of you.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It is likely that we will need to update this Privacy Notice from time to time. You are welcome to check our website whenever you wish.

For ease throughout this Notice, 'we' and 'us' means Stringbreakers Badminton Club, Gloucester.

2. What is Stringbreakers Badminton Club, Gloucester?

We are a Badminton Club based in Gloucester. We are a registered club with Badminton England and are run in wholly by volunteers.

3. Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company/organisation may collect and process your personal data, including:

Performance of a contract

If you are a member with us, have joined our club, entered into one of our competitions, we have to collect and process your data in order to perform our contract with you.

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters and notices.

Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting Stringbreakers Badminton Club, Gloucester to law enforcement.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in running and promoting badminton in England and which does not materially impact your rights, freedom or interests.

For example, we will use your data to send you information relating to your membership of Stringbreakers Badminton Club, Gloucester.



4. **When do we collect your personal data?**

- When you become one of our members
- When you enter a tournament or competition
- When you contact us by any means with queries, complaints etc.
- When you ask one of our Volunteers to email you information about a service.

5. **What sort of personal data do we collect?**

- Your name, gender, date of birth, address, email and telephone number. Also medical information can be collected (by consent) along with next of kin contact details.
- Details of your interactions with volunteers at Stringbreakers Badminton Club, Gloucester

For example, we collect notes from our formal conversations with you, details of any complaints or comments you make and how and when you contact us.

- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

6. **How and why do we use your personal data?**

We need to use your personal data if you are one of our members in order to fulfil our obligations to you.

We then use this to enter you on the Badminton England Database and may contact you regarding Badminton related news, benefits, offers, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in our members.

Of course, if you wish to change how we use your data, you will find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide a smooth service within the club.

For example, if you have asked us to let you know when YONEX All England Championships tickets go on sale, we cannot do that if you've withdrawn your general consent to hear from us. Or we are unable to advise you when a new benefit to the membership programme is launched.

7. **How we protect your personal data**

We know how much data security matters to all our members. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it. Other than outlined, we do not share your data to other online or offline services.

8. **How long will we keep your personal data?**

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected.

At the end of this period, your data will be deleted completely



9. Who do we share your personal data with?

We sometimes share your personal data with Badminton England and they with its affiliates.

Here is the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- County Badminton Associations
- IT companies who support our club through an online database
- Insurance companies (through BE)

10. What are your rights over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge (unless charges apply to us in fulfilling your request)
- The correction of your personal data when incorrect, out of date or incomplete.
- That you be "forgotten" or have your data erased, in certain situations.
- To have your data ported (that is, transmitted) directly to another organisation

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please email chair@stringbreakersbadminton.co.uk

To ask for your information to be amended please update your online profile. If we choose not to action your request we will explain to you the reasons for our refusal.

11. Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

12. Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.



13. Direct marketing

We will never knowingly pass your data on to an organisation that we know will use your data for direct marketing.

14. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling **0303 123 1113**.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

15. Any Questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

Email us on chair@stringbreakersbadminton.co.uk

DATA PROTECTION POLICY

1. Introduction

1.1 Stringbreakers Badminton Club ("**we**", "**our**" and "**us**") is a badminton club in Gloucester. In order to provide our services, we are required to collect, process, use and retain certain personal data for a variety of business purposes.

1.2 The majority of the personal data we process relates to our staff, volunteers, members and fans. We also process the personal data of visitors to our website and representatives of our suppliers and partners in connection with the provision of our services.

1.3 This data protection policy ("**Policy**") applies to all of our employees and contractors whose work involves processing personal data, and our suppliers and other individuals working or providing services on behalf of Stringbreakers Badminton Club who have access to the data included, but not limited to, in Clause 1.2 ("**you**", "**your**"). You must read, understand and comply with this Policy when processing personal data on our behalf and attend training on its requirements. You must protect the data you handle in accordance with this Policy and any applicable data security procedures at all times.

1.4 This Policy sets out what we expect from you in order for us to comply with applicable Data Protection Laws (as defined below). Your compliance with this Policy and all related policies and guidelines is mandatory. Any breach of this Policy may result in disciplinary action.



2. About the Policy

- 2.1 This Policy describes how personal data must be collected, handled and stored to meet the company's data protection standards and to comply with all applicable laws and regulations relating to processing of personal data and privacy, including without limitation the General Data Protection Regulation ("GDPR") and any other data protection legislation in force from time to time (as applicable) and including where applicable the guidance and codes of practice issued by the Information Commissioner or any other relevant regulator ("**Data Protection Laws**").
- 2.2 This Policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.
- 2.3 This Policy does not form part of any employee's contract of employment and may be amended at any time.
- 2.4 The Data Protection Officer is responsible for ensuring compliance with applicable Data Protection Laws and with this Policy. Any questions about the operation of this Policy or any concerns that the Policy has not been followed should be referred in the first instance to The Data Protection Officer, [Name of Data Protection Officer in your organisation].

3. Definitions of Data Protection Terms

"data controller" means the organisations that determines the purposes and means of the processing of personal data. We are the data controller of all personal data used in our business for our own commercial purposes.

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

"data processor" means an organisation or individual which processes personal data on behalf of Stringbreakers Badminton Club. Employees of data controllers are excluded from this definition but it could include suppliers which handle personal data on Stringbreakers Badminton Club behalf.

"data subjects" for the purpose of this Policy means all living individuals about whom Stringbreakers Badminton Club holds personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

"personal data" means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number (NI number), location data, online identifier (IP address) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

"processing" means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"sensitive personal data" are personal data, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data (e.g. DNA, finger prints etc.).

"the consent of the data subject" means any freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject, either by a statement or by a clear affirmative action, signifies agreement to personal data relating to them being processed.

4. Scope and Objectives of Policy

- 4.1 The Policy applies to personal data in all its forms whether on paper or stored electronically. It applies throughout the lifecycle of the information from creation through storage and utilisation to disposal. Appropriate protection is required for all forms of information to ensure business continuity and to avoid breaches of applicable Data Protection Laws or our contractual obligations.
- 4.2 With regard to electronic systems, the Policy applies to use of Stringbreakers Badminton Club equipment and privately/externally owned systems when connected to our network. This Policy applies to all company owned/licensed data and software.
- 4.3 The Policy will ensure that Stringbreakers Badminton Club:
 - 4.3.1 Complies with applicable Data Protection Laws and follows good practice;
 - 4.3.2 Protects the rights of its members, coaches, fans & partners;
 - 4.3.3 Is transparent about how it stores and processes personal data; and
 - 4.3.4 Protects itself from the risks of a data breach or other unlawful processing of personal data.

5. Data Protection Laws

- 5.1 The Data Protection Laws describe how we must collect, handle and store personal data and these rules apply regardless of whether data is stored electronically or in paper format.
- 5.2 Anyone processing personal data must comply with the enforceable principles of good practice. These include, but are not limited to, that personal data must:
 - 5.2.1 Be processed fairly and lawfully (lawfulness, fairness and transparency);
 - 5.2.2 Be collected only for specific and lawful purposes and not processed in a manner that is incompatible with those purposes (purpose limitation);
 - 5.2.3 Be adequate, relevant and limited to what is necessary for the purposes it is collected (data minimisation);
 - 5.2.4 Be accurate and kept up to date (accuracy);
 - 5.2.5 Not be held for longer than is necessary for the purposes it is collected (storage limitation);
 - 5.2.6 Be processed in accordance with the data subject's rights;
 - 5.2.7 Be processed in a manner that ensures appropriate security (integrity and confidentiality); and



5.2.8 Not be transferred to a country or a territory outside the European Economic Area ("EEA") unless that country or territory ensures an adequate level of protection.

5.3 Where we process personal data we are responsible for demonstrating compliance (accountability) with the principles set out in section 5.2 above.

6. Responsibilities

6.1 Whilst the Data Protection Officer is ultimately responsible for ensuring that Stringbreakers Badminton Club meets its legal obligations under applicable Data Protection Laws, you are responsible for compliance with applicable Data Protection Laws.

6.2 The committee is responsible for ensuring the security and integrity of our systems, services and equipment, and for monitoring staff compliance with IT policies and procedures.

6.3 All Stringbreakers Badminton Club members and committee are responsible for:

6.3.1 Keeping all personal as well as business critical and potentially sensitive data secure by taking sensible precautions and following the guidelines in this Policy;

6.3.2 Compliance with the Data Breach Policy;

6.3.3 Requesting guidance from the BE Data Protection Officer if unsure of any aspect of data protection;

6.3.4 Keeping updated about data protection risks and issues;

6.3.5 Reviewing and updating all data protection procedures and related policies, in line with legal requirements;

6.3.6 Attending regular data protection training;

6.3.7 Referring requests received from data subjects exercising their rights under applicable Data Protection Laws (see section 11 'Processing in line with Data Subject's Rights' below) to the Data Protection Officer immediately;

6.3.8 Checking any contracts or agreements with third parties that may handle the company's sensitive or personal data and if necessary referring them to the Data Protection Officer; and

6.3.9 Complying with Stringbreakers Badminton Club IT Policy.



7. Fair and Lawful Processing

- 7.1 Data Protection Laws are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.
- 7.2 For personal data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out under applicable Data Protection Laws. These include, among other things, the data subject's consent to the processing, or that the processing is necessary for the performance of a contract with the data subject, for the compliance with a legal obligation to which the data controller is subject, or for the legitimate interest of the data controller or the party to whom the data is disclosed. When sensitive personal data is being processed, additional conditions must be met.
- 7.3 We generally process personal data during the course of our business on the basis that the processing is necessary for the performance of a contract with the data subject (whether this be our employee or one of our members). To the extent the processing of personal data is necessary for staff administration and efficiency purposes, provided that such processing is not to the detriment of our employees, we process personal data on the basis that it is in our legitimate interests. Any personal data we process in the course of our business marketing is also on the basis of our legitimate interests, provided it is not to the detriment of the data subject.
- 7.4 Our privacy notices explain the legal basis on which we process personal data; these are available on request. A version of our privacy notice is available on our website. A privacy notice explaining what Stringbreakers Badminton Club does with members personal data will be included on the website.

8. Processing for Limited Purposes

- 8.1 We will only process personal data for specified, explicit and legitimate purposes, or for any other purposes specifically permitted by applicable Data Protection Laws. We will not undertake further processing in any manner incompatible with those purposes, and will not use it for new, different or incompatible purposes from that disclosed when it was first obtained, unless you have informed the data subject of the new purposes, and they have consented (if necessary).
- 8.2 We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter, and such purposes may include (amongst others):
- 8.2.1 Providing our services to our members, fans, customers;
 - 8.2.2 Fulfilling our contractual obligations to our employees, partners and suppliers;
 - 8.2.3 Compliance with our legal, regulatory and corporate governance obligations and good practice;
 - 8.2.4 Marketing our business and promoting our events; and
 - 8.2.5 Improving our services.



9. Providing information

- 9.1 In the course of our business, we may collect and process personal data. This may include data we receive directly from a data subject (for example, when a customer becomes a member, or by an employee providing bank details for remuneration purposes) and data we receive from other sources (for example, sub-contractors providing us with technical website services).
- 9.2 If we collect personal data directly from data subjects, we shall ensure that data subjects are aware that their data is being processed, and that they understand the purposes and lawful basis for which it is processed, the legitimate interests of Stringbreakers Badminton Club or third party (if applicable), any recipients or transfers of their data, the retention periods for their data and the existence of each of their rights in respect of such data.
- 9.3 If we collect personal data from a third party about a data subject, we will provide the data subject with the above information as soon as possible, and provide any additional information as prescribed by applicable Data Protection Laws.
- 9.4 To assist with our compliance of the above requirements, we have privacy statements setting out how we use personal data relating to data subjects (see section 7.4 above).

10. Adequate, Relevant and Non-Excessive Processing

We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject. As such, we will not process personal data obtained for one purpose for any unconnected purpose unless the data subject concerned has agreed to this or would otherwise reasonably expect this.

11. Data Accuracy

- 11.1 If we receive a request to update or correct any personal data we hold, and provided we have authenticated the identity of the data subject in question, we will take all reasonable steps to ensure that personal data we hold is accurate and kept up to date. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.
- 11.2 You must take reasonable steps to ensure that personal data is kept as accurate and up to date as possible and personal data should be updated as inaccuracies are discovered. For example, if an e-mail address is no longer in service, it should be removed from the database.
- 11.3 Data subjects may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the Data Protection Officer promptly.

12. Processing in line with Data Subject's Rights

- 12.1 We will process all personal data in line with data subjects' rights to and in connection with their personal data in accordance with the Data Protection Laws.



12.2 If a data subject makes a request (written or otherwise) to exercise any right (or purported right) in respect of their personal data, you should **immediately** forward it to the Data Protection Officer. Employees should not in any circumstances be bullied into disclosing personal information.

12.3 The Data Protection Officer will handle the response to the request and ensure that the identity of anyone making a request has been adequately verified before handing over any information.

12.4 Any complaints received from a data subject should be escalated to the Data Protection Officer **immediately**.

13. **Data Retention**

We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected, and all personal data will be held in accordance with our data retention policy.

14. **Data Security**

14.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We have put in place procedures and technologies appropriate to our size, scope and business, our available resources and the amount of personal data that we process. These measures will maintain the security of all personal data from the point of collection to the point of destruction. We will regularly evaluate and test the effectiveness of these measures to ensure security of our processing of personal data in accordance with our IT Policy.

14.2 We will only use data processors that agree to comply with these procedures and policies, or if it puts in place adequate measures itself. We will conduct adequate due diligence on all data processors and take all steps required by any applicable Data Protection Laws where we appoint a data processor, including ensuring such data processor:

14.2.1 enters a written agreement with Stringbreakers Badminton Club that includes sufficient guarantees as to the security measures the data processor has in place;

14.2.2 imposes confidentiality obligations on all volunteers who process the relevant data;

14.2.3 ensures the security of the personal data that it processes;

14.2.4 provides Stringbreakers Badminton Club with all information necessary to demonstrate compliance with applicable Data Protection Laws;

14.2.5 either returns or destroys the personal data at the end of the relationship;

14.2.6 implements measures to assist Stringbreakers Badminton Club in complying with the rights of data subjects;



- 14.2.7 continues to comply with its data protection obligations when processing personal data (i.e. by monitoring its compliance); and
- 14.2.8 implement additional specific data security arrangements where necessary to ensure such arrangements are of an equivalent standard to Stringbreakers Badminton Club 's.
- 14.3 We will regularly review the activities and processes of each data processor we use to check that it is processing personal data in line with our requirements and the requirements of the Data Protection Laws, and that such data processor is regularly testing its security measures to ensure they meet the applicable standards.
- 14.4 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:
 - 14.4.1 **Confidentiality** means that only people who are authorised to use the data can access it.
 - 14.4.2 **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.
 - 14.4.3 **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on Stringbreakers Badminton Club 's central computer system instead of individual PCs.
- 14.5 Security procedures include (but are not limited to):
 - 14.5.1 **Entry controls.** Any stranger seen in entry-controlled areas should be reported.
 - 14.5.2 **Secure lockable desks and cupboards.** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information may be considered confidential and sensitive). Where personal data is stored in desks and cupboards, these should only be accessible by individuals whom are authorised to access such personal data (e.g. personal data should not be stored in communal cupboards / drawers that are accessible by all staff).
 - 14.5.3 **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.
 - 14.5.4 **IT Security.** You must comply with our IT Policy at all times when handling personal data.
 - 14.5.5 **Privacy by design and default.** Privacy by design is an approach to Stringbreakers Badminton Club projects that promotes privacy and data protection compliance from the start. This may involve the person responsible for the project conducting a data protection impact assessment (also known as data privacy impact assessments or "**DPIAs**") prior to the start of any project that involves the processing of personal data. DPIAs are a tool which can help us identify the most effective way to comply with our data protection obligations and meet data subjects' expectations of privacy. An effective DPIA will allow us to identify and fix problems at an early stage, reducing the associated costs and damage to reputation which might otherwise occur. DPIAs are required when we are using new technologies, and when the processing of personal data is likely to result in a high risk to the rights and freedoms of individuals (such as the processing of sensitive personal data or systematic monitoring of public areas (e.g. CCTV)).



14.6 It is your responsibility to ensure that you keep personal data secure against loss or misuse in accordance with this Policy.

15. Sharing personal data

15.1 If we share personal data with third parties, we will do so in line with applicable Data Protection Laws. We may have to share personal data with government bodies such as “Track and Trace” or similar.

15.2 You may only share the personal data we hold with another member or contractor if the recipient has a job-related need to know the information and the transfer complies with any applicable cross-border transfer restrictions (see section 17 below).

15.3 You may only share the personal data we hold with third parties if:

15.3.1 sharing the personal data complies with the privacy notice provided to the data subject, and, if required, the data subject's consent has been obtained;

15.3.2 the transfer complies with any applicable cross-border transfer restrictions.

16. Data Storage

16.1 Personal data should be stored only electronically whenever possible and the recording of personal data in paper format should be kept to a minimum. In exceptional circumstances where personal data is recorded in paper format, it should be kept in a secure place to prevent unauthorised access to such personal data by unauthorised personnel.

16.2 When you store personal data, whether electronically or in paper form, you must protect it in accordance with our IT Policy.

17. Transferring Personal Data to a Country Outside the EEA

17.1 We may transfer personal data we hold to a country outside the EEA, provided that one of the following conditions applies:

17.1.1 The country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms.

17.1.2 The data subject has given his/her explicit consent (having been properly informed (i.e. of the risks etc.)).

17.1.3 The transfer is necessary for one of the reasons set out in any applicable Data Protection Laws, including: the performance of a contract between us and the data subject (or a third party (provided it is in the interests of the data subject)); or to protect the vital interests of the data subject.

17.1.4 The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.



17.1.5 The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.

17.2 You should not transfer personal data outside the EEA without first discussing it with BE Data Protection Officer.

18. Marketing

18.1 The committee feels marketing policy is not required in the context of running a local badminton club. Your details will not be shared by any club members without the data owners explicit consent.

18.2 You must comply with Stringbreakers Badminton Club 's guidelines on direct marketing to customers.

19. Data Breaches

You must comply with Stringbreakers Badminton Club 's Data Breach Policy.

20. Disclosing data for other reasons

In certain circumstances, the applicable Data Protection Laws allow personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances Stringbreakers Badminton Club will disclose requested data. However the SBC and BE Data Protection Officers will check that the request is legitimate seeking assistance from the BE's legal advisers where necessary.

21. Policy Awareness

21.1 The Policy will be made available to all staff. Staff and authorised third parties given access to Stringbreakers Badminton Club personal data will be advised of the existence of Stringbreakers Badminton Club's relevant policies, codes of conduct and guidelines that relate to the processing of personal data.

21.2 Training and guidance will be provided to staff on a periodic basis as necessary to refresh their knowledge or where there has been a substantial change in the Data Protection Laws or this Policy, to ensure all staff are aware of their obligations under this Policy and applicable Data Protection Laws. It is compulsory that staff complete this training/read the guidance.

21.3 You are obliged to comply with this Policy when processing personal data on behalf of us. Any breach of this Policy may result in disciplinary action.

22. Changes to this Policy

We reserve the right to change this Policy at any time. Where appropriate, we will notify you of those changes by mail or email.

23. Questions

Please refer questions to the Data Protection Officer – Adrian Parkinson (Chair)

DATA BREACH NOTICE

This note focuses on the key legal elements of responding to a breach of personal data security, principally the obligation to notify data protection authorities or data subjects.

The General Data Protection Regulation (GDPR) introduces an obligation on all organisations acting as data controllers to report data breaches and losses involving personal data to their relevant supervisory authority e.g. the Information Commissioner's Office (ICO) if the breach or loss is likely to result in a risk to individuals' rights and freedoms.

For more detailed guidance please see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>.

1. What is a breach?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches can therefore include:

- access of a database by an unauthorised third party;
- sending personal data to the wrong recipient;
- devices such as USB sticks, laptops or mobiles containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability (even if it is just temporary) of personal data, for example, where there has been a back-up failure.

2. When do you have to report a breach?

All personal data breaches must be recorded if you are a data controller of the relevant personal data, including the facts relating to the personal data breach, the effects of the breach and any remedial action taken in response (*Article 33(5), GDPR*) as data protection authorities may demand the right to inspect these records. However, only certain personal data breaches must be proactively notified to the relevant supervisory body and individuals concerned.



2.1 Supervisory Authority

Notification to the ICO is only triggered where a breach is likely to result in a risk to individuals' rights and freedoms. *(NB: in the case of a breach affecting individuals in different EU countries, the ICO may not be the lead supervisory authority. This means that as part of your 'breach response plan', you should establish which European data protection agency would be your lead supervisory authority for the processing activities that have been subject to the breach i.e. you need to know which EEA country any data processors operate in).*

When assessing the risk to individuals, organisations will need to consider the specific circumstances of the breach, including the likelihood, severity and potential impact of the risk. The Article 29 Working Party (**WP29**) (which was set up to provide the European Commission with independent advice on data protection matters and helps in the development of harmonised policies for data protection in the EU Member States) recommends considering the following factors when assessing risk:

- Type of breach.
- Nature, sensitivity and volume of personal data.
- How easy it is to identify individuals.
- How severe the consequences are for individuals.
- Special characteristics of the individual (for example, children or other vulnerable individuals may be at greater risk).
- Number of individuals affected.
- Specific characteristics of the data controller (for example a sports organisation processing large amounts of special categories of personal data will pose a greater threat than the mailing list of a club).

Example

The ICO recommends that where there has been theft of a database e.g. for your membership contracts where you hold any payment or bank details for those members, the data of which may be used to commit identity fraud, your members would need to be notified, given the impact this is likely to have on those individuals who could suffer financial loss or other consequences. On the other hand, it suggests that you would not normally need to notify the ICO, for example, about the loss or alteration of a staff telephone list.

2.2 Individuals

The requirement to communicate a breach to individuals is triggered where a breach is likely to result in a high risk to their rights and freedoms. The same factors listed above at paragraph 2.1 should be applied in assessing whether notification to individuals is required. WP29 suggests a presumption of high risk to individuals where the personal data involved is special categories of data. In practice, where notification to individuals is required, notification to the relevant supervisory authority will always be required.

Whether individuals should be notified will depend on the circumstances of the breach. For example, a loss of data which can be confirmed as encrypted and where the key has not been compromised, may represent a very low risk, and would not require notification to individuals (or indeed the supervisory authorities). However, even where data is encrypted, if there are no comprehensive backups of the data, then this could have negative consequences for individuals which could require notification (**WP29 Guidelines**).

NB: the ICO has the power to compel you to inform affected individuals if it considers there is a high risk.

Example

If your organisation suffers a breach that results in an accidental disclosure of some of its players'/participants' medical records, there is likely to be a significant impact on the affected individuals because of the sensitivity of the data and their confidential medical details becoming known to others. This is likely to result in a high risk to their rights and freedoms, so they would need to be informed about the breach.

3. What information needs to be contained in the notification?

3.1 Supervisory authority

The following information needs to be provided:

- 3.1.1 A description of the nature of the personal data breach including, where possible, the categories and approximate number of individuals concerned and the categories and approximate number of personal data records concerned.
- 3.1.2 The name and contact details of the data protection officer (if applicable) or other contact point where more information can be obtained.
- 3.1.3 A description of the likely consequences of the personal data breach.
- 3.1.4 A description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, actions taken to mitigate any possible adverse effects.

3.2 Individuals

The following information needs to be provided:

- 3.2.1 The name and contact details of the data protection officer (if applicable) or other contact point where more information can be obtained.
- 3.2.2 A description of the likely consequences of the personal data breach.
- 3.2.3 A description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, actions taken to mitigate any possible adverse effects.

In practice, the ICO or other supervisory authority may assist a controller in identifying what information should be communicated to individuals. Dedicated messages to individuals about data breaches should not form part of any press release or other media statement unless there are no other means of contacting the individuals.

4. When does the data breach need to be notified?

4.1 Supervisory Authority

A data controller must notify a data breach to a supervisory authority promptly, and where feasible, not later than 72 hours after having become aware of the breach. According to WP29, a controller is deemed to become aware of a data breach when the controller has "*a reasonable degree of certainty*" that the incident affects personal data.

For example, the 72 hour countdown will start as soon as you realise an unencrypted CD or other removal storage device with personal data has been stolen. Even though you may not understand how the breach has taken place, you will still have a '*reasonable degree of certainty*' that it has taken place. On the other hand, where you need to gather some evidence to establish '*with a reasonable degree of certainty*' that the suspected data breach has occurred, WP29 recognises that you may need a "short period of time" to perform an investigation before the clock starts. Although there is not a set deadline for this preliminary investigation and assessment, actions to investigate should be carried out as soon as you find out about a suspected breach. If you fail to carry out any preliminary investigation (e.g. by ignoring an alert or suspicion that a breach may have occurred) or you don't carry out an investigation promptly, you may be held accountable for a breach of your obligations under Article 32 GDPR (**WP29 Guidelines**).

It is not clear from the WP29 guidance whether you should still notify if you have reasonable certainty that a breach has taken place, but little information on the risk associated with the breach. However, it is clear that where you are in doubt, you should still make an interim notification in such circumstances until more is known. There will be no penalty for making a notification which ultimately turns out *not* to be a breach, but please be aware that notifying the ICO or such other regulator about a security incident does run the risk of investigation into the adequacy of security measures, even if it turns out that no harm has been done on that particular occasion.

4.2 Individuals

There is no set deadline for notifications to individuals, but this must be done without undue delay and will ultimately depend on the circumstances. For example, where financial information has been lost, the need to mitigate an immediate risk of damage would call for immediate communication to those individuals affected to give them the opportunity to change their passwords, security details etc.

WP29 suggests that normally data subjects will be notified after the supervisory authority, and following advice from such authority, but recognises that this will not always be the case, and importantly, that notifying the authority will not serve as a justification for failure to communicate to data subjects. In other words, don't wait for advice from ICO if the individuals affected are plainly at risk in the meantime.

5. What if you don't have all of the information available yet?

If you don't have all the necessary information within 72 hours of when you become aware of the data breach, it is still possible to provide this information in phases, provided further information is provided to the ICO promptly. The presence of this option to notify in stages will make it difficult for any organisation to argue that it is not feasible to make any notification within 72 hours.

6. **What role do your data processors have to play?**

The data controller is solely responsible for making data breach notifications. However, when a data breach has occurred in relation to data processed by a data processor, the processor has an obligation to report the breach to the controller without undue delay after becoming aware of it (*Article 33(2), GDPR*). **(Please see *template data processing agreements, which address how the processor should notify a data breach to the controller*).**

WP29 advises that you, as a data controller, will be deemed to become aware of a processor's breach when it communicates the breach to you. In practice, therefore, there is likely to be a permissible time lag between the processor's first awareness, and the time when you must notify the ICO, given that the processor may need to carry out some investigations to establish with reasonable certainty that the breach has occurred and which data controller(s) it affects and you as a data controller may need to perform your own investigation.

7. **What if you fail to report a breach?**

Failing to notify a breach when required to do so could result in administrative fines of up to EUR10 million or 2% of annual global turnover. However, if you fail to take appropriate security measures against data breaches in accordance with your obligations under the Accountability principle (Article 5, GDPR) (**See *Advice note on Accountability***) you may be subject to fines up to the higher threshold of fines i.e. EUR20 million or 4% of the annual global turnover. It is currently unclear which fine threshold applies for a violation of the information security obligations under the GDPR, but it is possible in some circumstances that failing to implement an appropriate data breach response plan could trigger this higher threshold of fine.

8. **What should you be doing now?**

A personal data breach is a situation when regulatory scrutiny will be applied to your security measures and compliance with Articles 5 and 32 GDPR. Could you have put technical and organisational measures in place which would have prevented the personal data breach? Therefore, good preparation for data breach handling will allow you as a data controller to manage your risk better. The following will give you a good idea of the things to consider now to help you get ready to react to any breach:

- 8.1 ***Know your data*** – map your data so you know what personal data you are processing, what is used for, what systems are used and where the data is stored. Failure to quickly identify data potentially affected by a breach through ignorance of what is on your systems, is likely to be seen as a big negative in any assessment by the ICO
- 8.2 ***Data breach management plan*** - put together a comprehensive data breach management plan i.e. who is responsible for the overall management of a breach response, detection, escalation, communications, investigation, and recovery/remediation
- 8.3 ***External advisors*** – consider whether there is scope for engaging a technical response/ forensic investigation provider to speed up the reaction to a data breach and access to the information needed for notification

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- 8.4 **Training**- training is essential to support your relevant policies and procedures to ensure that all employees can identify any security breaches and escalate them to appropriate individuals and teams responsible for data breach management
- 8.5 **Testing**- test your systems and procedures to identify and remedy any vulnerabilities
- 8.6 **Insurance**- consider your insurance coverage for potential personal data breaches, particularly in light of the potential fines under GDPR although in the UK it is generally not possible to insure against a fine, only the costs of dealing with an incident and the costs of any proceedings or appeal
- 8.7 **Monitoring** – establish a routine of regular system testing, updated and refresher training for current and new staff/volunteers and a regular review of any identified breaches to see whether they highlight the need for procedural changes