



**ENGLISH VOLLEYBALL
ASSOCIATION LIMITED**

GOOD PRACTICE GUIDANCE





1. INTRODUCTION

- 1.1 Volleyball England is the brand name of the English Volleyball Association Limited (referred to in this good practice guidance as the "**Organisation**"). The Organisation is responsible for the development, promotion and delivery of the sport of volleyball, in all its disciplines, across England.
- 1.2 This Guidance document includes the Organisation's following policies:
 - 1.2.1 Part 1 - Equality and Diversity;
 - 1.2.2 Part 2 - Ethics;
 - 1.2.3 Part 3 - Anti-bullying and Block it Out charter;
 - 1.2.4 Part 4 - Whistleblowing;
 - 1.2.5 Part 5 - Anti-Fraud; and
 - 1.2.6 Part 6 – Cybersecurity.
- 1.3 Defined terms used throughout this good practice guidance shall have the same meaning set out in the Articles of Association and in the Framework Document accessible on the Organisation's [website](#).

PART 1

EQUALITY AND DIVERSITY POLICY

1. BACKGROUND

1.1 The aim of this policy is to:

1.1.1 Ensure that all present and potential Members, volunteers and staff of Volleyball England ("the **Organisation**") are treated fairly; and

1.1.2 Ensure that there is open access for all those who wish to participate in the sport and that they are treated fairly.

2. OBLIGATIONS

2.1 The Organisation will:

2.1.1 promote equality of opportunity to its Members, volunteers and staff;

2.1.2 ensure that the Policy is effectively communicated and that training and guidance is given (as appropriate) to ensure that all Members, volunteers and staff fully understand their responsibilities as set out both in the Policy and the legislation. This will take account of the:

(a) Sex Discrimination Act 1975, 1986 & 1999

(b) Equal Pay Act 1970

(c) Rehabilitation of Offenders Act 1974

(d) Human Rights Act 2000

(e) Equality Act 2010

2.2 The Organisation is committed to sports equality which is about:

2.2.1 fairness in sport, equality of access, recognising differences and taking steps to meet them;

2.2.2 changing the culture and structure of sport to ensure it becomes equally accessible to all members of society;

2.2.3 making sure all individuals can realise their talent and fulfil their potential; and

2.2.4 an individual's responsibility to challenge discriminatory practice and promote inclusion.

2.3 This Policy applies to all of the Organisation's employees, volunteers, members, consultants, contractors etc. in any way connected with the Organisation, who for the purposes of this Policy are referred to as 'individuals'. This also includes those who play in Volleyball England Affiliated Clubs, Regional and County Associations and events under the jurisdiction of Volleyball England.

2.4 The Organisation reserves the right to discipline any of its Members, volunteers and/or staff who practice any form of discrimination on the grounds of a person's age, colour, race, nationality, religion,



ethnic or national origin, gender, marital status, sexuality, HIV status, unrelated criminal convictions, disability and/or such other characteristics as provided for by the Equality Act 2010.

3. **DIVERSITY STATEMENT**

3.1 The Organisation has a desire, a duty of care and is committed to ensuring that we provide services fairly and without discrimination to all who want to participate in the sport of volleyball.

3.2 We pride ourselves in that we are an open and accessible sport and that there are no barriers to participation across the Organisation, from players and volunteers to staff and Board members. In our strategy, we will continue to focus on making volleyball available to all individuals and groups who are currently not fully involved in our sport.

3.3 A key aim of the Board is to extend the diversity from our Board into all areas of the Organisation.

3.4 The Organisation will take all appropriate actions to ensure a minimum of 30% of each gender is represented on its Board at all times.

3.5 As the national governing body, for a mixed gender sport, we recognise diversity and we value everyone's individual differences. We strive to maintain and continuously improve our working practices to benefit all those who participate or would like to participate in our sport. Anyone who has the desire to be involved in the sport of volleyball should be encouraged to take up the opportunity and be nurtured to reach their full potential.

3.6 The Organisation will:

3.6.1 act as an exemplar for equality and diversity within its sphere of influence, and in doing so it commits to promoting positive and inclusive practice within the Organisation and with its partners;

3.6.2 ensure that responsibility and accountability for equality is placed at the most senior levels within the Organisation, with the CEO having overall responsibility and accountability for the effective implementation of this Policy;

3.6.3 build equality and diversity into all aspects of its work. All reasonable steps will be taken to ensure that employees, volunteers, Members, consultants, contractors etc. are committed to this Policy;

3.6.4 ensure that no job applicant or employee receives less favourable treatment on the grounds of any protected characteristic;

3.6.5 work to ensure that there will be open access to all those who wish to participate in the sport and that they are treated fairly; and

3.6.6 ensure that all individuals are able to conduct their volleyball related activities free from bullying and harassment (please see the Anti-Bullying and Harassment Policy in this Guidance).

4. **FORMS OF DISCRIMINATION**

Discrimination can present itself in different guises including verbal, physical or online. The Equality Act 2010 lists different types of discrimination as covered below.

4.1 Direct Discrimination

Direct discrimination occurs when someone is treated less favourably than another person because:

4.1.1 of a protected characteristic they have; or

4.1.2 of a protected characteristic they are thought to have; or

4.1.3 they associate with someone who has a protected characteristic.

4.2 Indirect Discrimination

4.2.1 Indirect discrimination can occur when there is a condition, rule or practice which applies to everyone but particularly disadvantages people who share a protected characteristic.

4.2.2 Indirect discrimination can be justified if the action(s) undertaken are reasonable in order to achieve a legitimate aim.

4.3 Discrimination by association

Discrimination by association is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

4.4 Discrimination by perception

Perception discrimination is direct discrimination against an individual because others think they possess a particular protected characteristic, even if they don't actually possess it or if the perception was mistaken.

4.5 Harassment

4.5.1 Harassment is defined as '*unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual*'.

4.5.2 Harassment also covers harassment because of 'perception' and 'association'.

4.5.3 It also includes the right for individuals to raise an issue that they find offensive even if it is not directed at them.

4.5.4 Harassment is further dealt with in the Anti-Bullying Policy included in this good practice guidance.

4.6 Third Party Harassment

4.6.1 Third party harassment relates to actions carried out by non Volleyball England individuals such as customers, clients, contractors etc.

4.6.2 The Organisation will investigate any report or complaint of third party harassment and will take all reasonable steps to prevent it from happening again.

4.7 Victimisation

4.7.1 Victimisation is illegal and is when an employee is treated badly because they have made or supported a complaint/grievance about discrimination or harassment under the Equality Act, or are suspected of either making or supporting such a complaint/grievance.

4.7.2 An individual is not protected from victimisation if he/she acted maliciously, or made or supported an untrue complaint.

5. **TRANSGENDER ATHLETES**

The Organisation considers that volleyball is a gender affected sport under the Equality Act 2010.

6. **IMPLEMENTATION – THE ORGANISATION'S RESPONSIBILITIES**

The Organisation will:

- 6.1 make available on its website a copy of this policy which outlines that all individuals have responsibilities to respect, act in accordance with and thereby support and promote the spirit and intentions of this Policy;
- 6.2 ensure that this policy is an integral part of the recruitment, induction and on-going training for all employees;
- 6.3 the CEO shall monitor staff recruitment and employment practices to ensure that they are non-discriminatory; one such method will be to monitor equality and diversity data collected at the recruitment stage and also on the workforce, in order to be in a position to make recommendations for any corrective or positive action;
- 6.4 consider making 'reasonable adjustments' in the provision of employment, goods and services, to overcome barriers caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alternation of physical features, and/or any practice/process which may impede people with disabilities. Full consideration will be given to the request for reasonable adjustments which will be accommodated wherever possible;
- 6.5 ensure that consultants, contractors, partners, agents, advisors etc. are appointed fairly and equally; and
- 6.6 encourage all Affiliated Clubs and Associations to adopt this Policy and reference it in their constitutions, also to abide by the principles and spirit of the policy in everything that they do.

7. **IMPLEMENTATION – MANAGERS' RESPONSIBILITIES**

All managers are required to set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this Policy and promote the Organisation's values and objectives with regards to equality and diversity.

8. **IMPLEMENTATION – INDIVIDUALS' RESPONSIBILITIES**

- 8.1 Individuals must not discriminate against or harass any other individual in the course of their duties and are required to assist the Organisation to meet its commitment to this Policy including the implementation requirements above.
- 8.2 Individuals can be held personally liable, as well as the Organisation, or instead of, for any act of unlawful discrimination. Individuals who commit serious acts of harassment may be guilty of a criminal offence as well as gross misconduct.

9. **POSITIVE ACTION**

The Organisation may take positive action in the form of proportionate measures to encourage or train people from under-represented groups to play, apply for paid and voluntary roles within volleyball and overcome a perceived disadvantage or meet specific needs based on a protected characteristic.

10. **BREACHES OF THIS POLICY**

Acts of discrimination, harassment, bullying or victimisation are disciplinary offences and will be investigated under the appropriate Code of Conduct and the Grievance and Disciplinary Policy, if proven such acts may be considered as gross misconduct which could lead to summary dismissal or suspension from volleyball activities. The Organisation takes a strict approach to serious breaches of this Policy by anyone within the volleyball network.

PART 2

ETHICS POLICY

1. **BACKGROUND**

- 1.1 The purpose of this Ethics Policy is to develop and maintain a culture of openness, trust and integrity in all Volleyball England's ("the **Organisation**") activities. Effective ethics is a 'team effort' involving the participation and support of every one of the Organisation's employees, Board members, volunteers and other organisations we work alongside to deliver the Organisation's projects and programmes.
- 1.2 The Organisation is committed to protecting its employees, participants, members, volunteers, partners and suppliers from illegal or damaging actions by individuals or groups working for or with the Organisation, either knowingly or unknowingly.
- 1.3 The Organisation will not tolerate any wrongdoing or impropriety at any time. It will take the appropriate measures and act quickly where the 'ethical code' is broken.

2. **BOARD COMMITMENTS**

The Board commits to:

- 2.1 ensure that integrity underpins the Organisation's activities;
- 2.2 comply with the Conflict of Interest policy and the Code of Conduct;
- 2.3 demonstrate the highest standards of personal integrity, truthfulness and honesty in all activities, in order to inspire confidence and trust;
- 2.4 have an open-door policy and welcome suggestions and concerns from all employees, participants, members, volunteers and partners;
- 2.5 keep the Organisation's Members informed about issues affecting them; and
- 2.6 respect and protect privileged information to which they have access in the course of their official duties.

3. **EMPLOYEES COMMITMENTS**

The Organisation's employees will:

- 3.1 recognise that the overarching function of the Organisation, at all times, is to serve the best interests of its Members and they will do this with respect, integrity, concern, courtesy and responsiveness;
- 3.2 disclose any conflicts of interest regarding their positions and comply with the Code of Conduct;
- 3.3 engage in carrying out the Organisation's mission in a professional manner and in line with the Organisation's core values;
- 3.4 treat everyone fairly and with mutual respect;
- 3.5 promote a team environment and avoid the intent and appearance of unethical or compromising practises;

- 3.6 respect the structure and responsibilities of the different management teams and provide them with facts and advice as a basis for decision and policy making, and uphold and implement decisions and policies adopted by the management teams;
- 3.7 demonstrate the highest standards of personal integrity, truthfulness and honesty in all activities in order to inspire confidence and trust in all activities, both internally and externally;
- 3.8 respect and protect privileged information to which they have access, in the course of their official duties;
- 3.9 strive for personal and professional excellence, managing their own professional development and encouraging that of others;
- 3.10 conduct themselves, at all times with professional competence, fairness and impartiality;
- 3.11 hold paramount the safety, health and welfare of the Organisation's Members, participants and the public in the performance of their official duties;
- 3.12 collaborate with and support others in carrying out the Organisation's mission; and
- 3.13 keep the Members informed about issues affecting them.

4. **GOVERNANCE AND REVIEW**

- 4.1 Should an employee, participant, Member, volunteer or partner organisation be in any doubt about a relevant course of action, require clarification on a particular issue, or want to report a potential breach of the Organisation's ethical code, they should report directly to their line manager/ member of the Senior Management Team or to one of the Board. The topic/issue will then be dealt with as quickly and efficiently as possible and guided by the Organisation's policies and procedures, mission and values.

PART 3

ANTI-BULLYING POLICY AND 'BLOCK IT OUT' CHARTER

1. INTRODUCTION

- 1.1 Volleyball England ("the **Organisation**") is committed to the prevention and effective management of bullying behaviour in volleyball.
- 1.2 This Policy aims to:
- 1.2.1 provide staff, coaches, volunteers and officials with information if they are concerned about bullying;
 - 1.2.2 provide registered Members and parents with information about what steps are being taken to safeguard against bullying;
 - 1.2.3 set clear and consistent standards of behaviour;
 - 1.2.4 establish an operational framework and introduce procedures of actions to take if there are concerns about unacceptable behaviour;
 - 1.2.5 assure all people that they will be participating in a safe and friendly environment and that their wellbeing is our priority; and
 - 1.2.6 ensure that the rights to protection from abuse and neglect are upheld.
- 1.3 The Organisation's aim when dealing with any complaints of harassment, is to swiftly resolve the problem in such a way as to maintain, as far as possible, a reasonable working environment for all parties concerned, confidentially and sensitively and with due respect for the rights of the victim.
- 1.4 Everyone connected with the sport of volleyball have a duty to challenge conduct or language which has the potential to offend or humiliate another person, whether a colleague or volunteer.

2. WHAT IS BULLYING?

- 2.1 Bullying is any persistent behaviour by an individual or group which intimidates, threatens or has a harmful and distressing impact on another individual or group. Such behaviour can occur between young people but also from adults towards young people or between adults themselves and is often motivated by prejudice against different groups. For example on grounds of race, religion, sex, social background or sexual orientation.
- 2.2 Bullying behaviour may include any of the following:
- 2.2.1 Verbal - name-calling or making personal comments.
 - 2.2.2 Social - ostracised or left out of peer group activities.
 - 2.2.3 Material - when possessions are stolen or damaged or extortion takes place.
 - 2.2.4 Emotional - including pressure to conform.
 - 2.2.5 Physical - including any use of violence.

- 2.2.6 Sexual - unwanted physical contact or sexually abusive comments.
- 2.2.7 Racist - racial comments, language, graffiti or gestures.
- 2.2.8 Homophobic - because of, or focusing on, the issue of sexual orientation.
- 2.2.9 Virtual - action through digital or cyber technology including social media, emails or text messaging.

2.3 Bullying is different from fighting, which is usually a one-off incident with the purpose of dealing with immediate conflict. Verbal and social forms of bullying take place more often than material or physical bullying, with name-calling by far the most common.

3. **ANTI-BULLYING CHARTER: 'BLOCK IT OUT'**

3.1 Bullying of any kind is not acceptable within volleyball and should not be tolerated. The Organisation is committed to the following anti-bullying charter to prevent and manage bullying behaviour by aiming to 'Block It Out'.

Teams, Clubs and organisations within the volleyball community

3.2 It is expected that all teams, clubs and organisations within the volleyball community will pledge that they will:

- 3.2.1 respond appropriately and effectively to incidents of bullying;
- 3.2.2 listen and respond to people's concerns and take appropriate action;
- 3.2.3 take parents'/carers' concerns seriously and respond effectively; and
- 3.2.4 ensure all staff and volunteers are suitably trained to deal with any incidents.

3.3 It is expected that all teams, clubs and organisations within the volleyball community will aim to:

- 3.3.1 create a positive, participative environment for all registered members and participants in the sport;
- 3.3.2 encourage safe, accessible and challenging opportunities for everyone; and
- 3.3.3 ensure that all people are able to participate freely in a safe, caring environment.

3.4 To achieve the aims as out in this policy all teams, clubs and organisations within the volleyball community will:

- 3.4.1 emphasise the positive social values of participation, sharing, helping and encouraging;
- 3.4.2 promote justice and equality in all activities;
- 3.4.3 establish clear ground rules/boundaries for activities;
- 3.4.4 ensure that all staff, coaches, volunteers and officials are offered appropriate training on behaviour management and bullying awareness;
- 3.4.5 work towards continuously improving the quality of activities; and
- 3.4.6 commit to taking positive steps to eliminate bullying incidents within activities.

Participants

- 3.5 To achieve the aims set out in this policy all teams, clubs and organisations within the volleyball community will encourage all participants to behave according to agreed codes of conduct, which will provide a framework of acceptable behaviour.
- 3.6 All participants agree to abide by the following:
- 3.6.1 We will not tolerate bullying or harassment of any kind.
 - 3.6.2 We will be accepting of others regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation or social status
 - 3.6.3 We will not ignore an incident of bullying and will take all signs of bullying seriously.
 - 3.6.4 We will use a 'time out' if we feel angry or under pressure, or just need time to calm down.
 - 3.6.5 We will be kind to others, even if they are not our friends and we will make new participants in our activities feel welcome.
 - 3.6.6 We will not join in fights or disturbances.
 - 3.6.7 We will report any bullying incident to a member of staff/ official immediately.
 - 3.6.8 We will not judge others on the way they speak, their social behaviour, appearance or their ability.
 - 3.6.9 We will try to remember that everyone matters, including ourselves.
 - 3.6.10 We will encourage all young people to speak and share their concerns.
 - 3.6.11 We will encourage our staff, coaches, volunteers and officials to be vigilant and observant at all times.
 - 3.6.12 If incidents of bullying are witnessed, our staff, coaches, volunteers and officials will respond by following the procedures set out in this policy and the Organisation's Safeguarding & Protecting Young People Policy.

4. IMPLEMENTING ANTI-BULLYING PROCEDURES

- 4.1 It is expected that the Organisation's Anti-Bullying Policy and Anti-Bullying Charter 'Block It Out' will be adopted by all teams, clubs and organisations within the volleyball community and that copies of both will be made widely available.
- 4.2 All individuals involved in volleyball should be aware of the Anti-Bullying Policy and Charter and should ensure that others are too, including adults and young people. This should be achieved by distributing copies of the documents to all those involved in the activity and displaying them prominently on noticeboards and throughout the venue. See the template: Block it Out! Anti-Bullying Charter Poster included in the Safeguarding & Protecting Young People Policy. More importantly people should know their rights and realise that they can talk to someone if they are worried.
- 4.3 The Organisation will ensure that:
- 4.3.1 The Codes of Conduct clearly state that behaviour which constitutes bullying will not be accepted.
 - 4.3.2 All coaches, officials, volunteers, staff and people have signed up to the Codes of Conduct.

- 4.4 Any incidents of bullying should be reported to the Club or Regional Safeguarding Officer who will record the details using the Organisation's Safeguarding Incident Reporting Form (SIRF) included in Safeguarding & Protecting Young People Policy and follow the Organisation's reporting procedure.
- 4.5 If the incident is an adult bullying a young person, the Club or Regional Safeguarding Officer will report the incident to the Lead Safeguarding Officer who will make a decision on the method and process for managing the incident and manage the situation with the support of the relevant Club or Regional Safeguarding Officer as appropriate.
- 4.6 All reported incidents of bullying behaviour, or threats of bullying, will be investigated and efforts made to stop the bullying quickly.
- 4.7 Once an event is reported the following actions may be taken:
- 4.7.1 If the event involves a young person, parents/carers will be informed and may be asked to come to a meeting to discuss the problem;
 - 4.7.2 If necessary and appropriate, the Police or Children's Social Care may be consulted;
 - 4.7.3 An attempt will be made to change the bullying behaviour; and
 - 4.7.4 If the situation is not or cannot be resolved through mediation, training or mentoring, the Lead Safeguarding Officer may manage the incident following the Organisation's Grievance and Disciplinary Policy.
5. **REPORTING AN INCIDENT**
- 5.1 If you witness someone being bullied or you have been bullied you should:
- 5.1.1 report the incident to the Club Safeguarding Officer (CSO). If your club does not have a CSO, the report must be made to the Regional Safeguarding Officer (RSO).
 - 5.1.2 Fill in the Organisation's SIRF, giving full details of what occurred.
- 5.2 What the CSO should do:
- 5.2.1 Immediately contact the Regional or National Safeguarding Officer and report the incident and actions.
 - 5.2.2 Where the Regional or Lead Safeguarding Officer is unavailable or where contacting them may cause undue delay contact the Police and/or Children's Social Services.
- 5.3 If a young person is involved, this policy should be read in conjunction with the Safeguarding & Protecting Young People Policy available on the [website](#).

PART 4

WHISTLEBLOWING POLICY

1. INTRODUCTION

- 1.1 It is important that any concerns regarding the behaviour of any member of staff, volunteer or contractor, working on behalf of Volleyball England (the "**Organisation**") are shared with a member of the Organisation's staff. All concerns will be taken seriously and managed according to the Organisation's Grievance and Disciplinary Policy.
- 1.2 All information received and discussed will be treated in confidence and only shared with those individuals who will be able to manage and resolve the situation.
- 1.3 Individuals can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage. This Policy is intended to encourage and enable individuals to raise serious concerns within the Organisation and blow the whistle, rather than overlook the concern.
- 1.4 It is in the interests of all concerned that any disclosure is dealt with properly, quickly and discreetly. This includes the interests of the Organisation, its employees, all registered Members and any persons who are the subject of any complaint, as well as the person making the complaint.

2. REPORTING PROCEDURE

- 2.1 The Organisation recognises that the decision to report a concern can be a difficult one to make for many reasons, including fear of reprisal from those implicated in the concern. If an individual believes what they are saying to be true, they should have nothing to fear, because in reporting their concern they will be doing their duty to the person concerned.
- 2.2 The Organisation will not tolerate any harassment, bullying or victimisation (including informal pressure) towards whistleblowers and will take appropriate action to protect individuals when they raise a concern in good faith, any such inappropriate behaviour will be dealt with under the Organisation's Grievance and Disciplinary Policy.
- 2.3 Any investigation into allegations of poor practice will not influence, or be influenced by, any disciplinary procedures that already affect individuals unless there may be a pattern of poor practice and/or abuse which requires the cases to be linked and/or dealt with together.

3. DISCLOSURES UNDER THIS POLICY

- 3.1 You can make a disclosure under this Policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:
 - 3.1.1 Failure to comply with any codes of conduct or values of the Organisation;
 - 3.1.2 Criminal activity;
 - 3.1.3 Practices endangering health and safety;
 - 3.1.4 Practices damaging the environment;
 - 3.1.5 Bribery;

3.1.6 Financial malpractice, impropriety or fraud; and

3.1.7 Attempts to conceal any of the above.

3.2 You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.

4. **CONFIDENTIALITY**

The Organisation will do its utmost to protect the identity of the whistleblower when they raise a concern and do not want their name to be disclosed. However, it must be appreciated that the investigation process may reveal the source of the information and a statement by the whistleblower may be required as part of the evidence. They will be given prior notice of this and a chance to discuss the consequences.

5. **ANONYMOUS ALLEGATIONS**

The Organisation encourages the whistleblower to put their name to the allegation. Concerns expressed anonymously are much less powerful and may not provide all the relevant information. However, all reports will be considered at the discretion of the Organisation based on the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources or factual records.

6. **UNFOUNDED ALLEGATIONS**

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If however, it is established that they have made malicious or frivolous allegations, or for personal gain, disciplinary action may be taken against them. In such cases, the Organisation's Grievance and Disciplinary Policy will apply.

7. **USE OF THE WHISTLE BLOWING POLICY**

7.1 As a staff member

7.1.1 In the first instance, as a staff member, you should bring the matter to the attention of your immediate manager, who will inform the CEO. If the disclosure contains allegations about your immediate manager or the malpractice occurs at this level, you may make the disclosure directly to the CEO.

7.1.2 If your disclosure contains allegations which you do not wish to make to the CEO you can make the disclosure to the Chair of the Board.

7.1.3 If your disclosure concerns a very serious allegation the Board will be notified.

7.2 Volunteer concerns

7.2.1 Individuals should raise the concern in the first instance with the CEO by post to the national office, marked 'private and confidential' or via email to: issues@volleyballengland.org.

7.2.2 The individual should set out the background and history of the concern, giving names, dates and places where possible and the reason why they are particularly concerned about the situation. The earlier the concern is raised, the easier it is to take action.

7.2.3 Although the whistleblower is not expected to prove the truth of an allegation, they will need to demonstrate to the Organisation that there are sufficient grounds for their concern.

- 7.2.4 If you do not want, or feel unable to report the concern to the Organisation, a number of external agencies are available for reporting purposes. These include:
- (a) The Child Protection in Sport Unit (CPSU) (Tel: 0116 234 7278/7280)
 - (b) Local Safeguarding Children's Board (LSCB)
 - (c) Local Children's Social Care
 - (d) Local Police
- 7.2.5 The action taken by the Organisation will depend on the nature of the concern.
- 7.2.6 In order to protect individuals, it is likely that the Organisation will establish a case management team in order to conduct an investigation. The amount of contact between the people considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from the whistleblower as part of the investigation process.
- 7.2.7 When any meeting is arranged the whistleblower has the right, if they so wish, to be accompanied by a friend or a person of their choice who is not involved in the matter to which the concern relates.
- 7.2.8 The Organisation will take steps to minimise any difficulties which individuals may experience as a result of raising a concern. For instance, if the whistleblower is required to give evidence in criminal or disciplinary proceedings, the Organisation will advise them about the procedure.
- 7.2.9 The Organisation accepts that the whistleblower needs to be assured that the matter has been properly addressed. Subject to legal constraints, they will receive information about the outcome of any investigation, and the action that is to be taken against those whose actions caused the concern. Also, if appropriate, what policy changes are to be made to minimise the possibility of a similar concern being raised in the future.

PART 5

ANTI-FRAUD POLICY

1. INTRODUCTION

- 1.1 This document sets out Volleyball England's ("the **Organisation**") policy and procedures in respect of fraud and other forms of dishonesty, together with the steps that must be taken where any of these practices is suspected or discovered.
- 1.2 It applies to the Board, staff, volunteers and suppliers, contractors, consultants and other service users that the Organisation works with ("the **Partners**").
- 1.3 Anybody associated with the Organisation who commits fraud, theft or any other dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.
- 1.4 The Organisation is committed to protecting the public funds with which it has been entrusted. To ensure resources are used for their intended purpose in line with the strategy (the Game Plan), it is essential that losses due to fraud and corruption are minimised.
- 1.5 The public are entitled to expect that the Organisation will conduct its affairs with integrity, honesty and openness, and demand the highest standards of conduct from the Board, staff, volunteers, and the Organisation's Partners. This Policy outlines the Organisation's commitment to creating an anti-fraud culture and maintaining high ethical standards in its administration of public funds.

2. STATEMENT OF INTENT

- 2.1 The Organisation will conduct its business in a legal and ethical manner in line with its vision and values. We are committed to the prevention of fraud and to the promotion of an anti-fraud culture.
- 2.2 We operate a zero-tolerance attitude to fraud and require the Board, staff, volunteers and our other Partners to act honestly and with integrity at all times, and to report all reasonable suspicions of fraud.
- 2.3 The Organisation will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.
- 2.4 All members of the Organisation have a responsibility for putting these principles into practice and for reporting any breaches they discover.
- 2.5 The Organisation will investigate all instances of actual, attempted and suspected fraud committed by any member of the Board, staff, volunteers or other Partners and will seek to recover funds and assets lost through fraud.
- 2.6 You may commit a criminal offence if you fail to comply with this Policy.

3. DEFINITION OF FRAUD

- 3.1 Fraud is broadly defined in case law (Derry v Peek, 1889) as:

'someone intentionally or recklessly obtaining resources to which they are not entitled'.

- 3.2 The offences of theft, fraud, bribery and forgery are rooted in the Theft Acts of 1968 and 1978, The Fraud Act 2006, Bribery Act 2010 and the Forgery and Counterfeiting Act 1981.
- 3.3 Section 1 of the Theft Act 1968 defines theft as:
- 'dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it'.*
- 3.4 Fraud can arise in a number of different scenarios.
- 3.5 For the purposes of this policy fraud shall be as defined in the Fraud Act 2006. This is summarised below:-
- 3.5.1 A person is guilty of fraud if he dishonestly makes a false representation, or intends, by making the representation to make a gain for himself or another, or to cause loss to another or to expose another to a risk of loss.
- 3.5.2 To make a representation that is false untrue or misleading.
- 3.5.3 Fraud by failing to disclose information: If an individual dishonestly fails to disclose to another person information which he is under a legal duty to disclose.
- 3.5.4 Fraud by abuse of position: If an individual occupies a position in which he is expected to safeguard, or not to act against, the financial interests of another person or organisation.
- 3.5.5 "Gain" and "loss": The references to gain and loss extend only to gain or loss in money or other property.
4. **CULTURE**
- 4.1 The Organisation's culture is intended to foster honesty and integrity and is underpinned by seven principles of behaviour. These are selflessness, integrity, objectivity, accountability, openness, honesty and leadership. Board, staff and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and other partners are expected to act with integrity and without intent to commit fraud against the Organisation in any dealings they may have with them.
- 4.2 The Organisation is committed to preventing fraud and corruption from occurring and to developing an anti-fraud culture. To achieve this the Organisation will comply with the requirements by:
- 4.2.1 developing and maintaining effective controls to prevent fraud;
- 4.2.2 ensuring that if fraud occurs a vigorous and prompt investigation takes place;
- 4.2.3 taking appropriate disciplinary and legal action in all cases, where justified;
- 4.2.4 reviewing systems and procedures to prevent similar frauds;
- 4.2.5 investigating whether there has been a failure in supervision and taking appropriate disciplinary action where supervisory failures occurred; and
- 4.2.6 recording and reporting all discovered cases of fraud.
- 4.3 The following policies and principles apply:
- 4.3.1 The Organisation's staff must have, and be seen to have, the highest standards of honesty, propriety and integrity in the exercise of their duties.

- 4.3.2 The Organisation will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety, or dishonest conduct by the Board, staff, volunteers or other Partners.
- 4.3.3 Staff must not defraud the Organisation, other staff and/or Partners in any way.
- 4.3.4 The Organisation will take action – including dismissal and/or criminal prosecution where appropriate - against any member of the Board, staff or volunteers defrauding (or attempting to defraud) the Organisation, other staff, volunteers and/or other Partners.
- 4.3.5 The Organisation will take action - including criminal prosecution where appropriate - against external organisations defrauding or attempting to defraud the organisation, staff and volunteers or Partners in the course of their work.
- 4.3.6 The Organisation will co-operate fully with any external investigating body.
- 4.3.7 The Organisation will always seek to recover funds lost through fraud.

- 4.4 All frauds will be reported to the Chair of the Board and the Finance, Strategy and Risk Sub-Group.
- 4.5 As part of the culture, the Organisation will provide clear routes by which concerns can be raised and by those inside and outside of the Organisation. A copy of the Organisation's whistleblowing policy (included in the Good Practice Guidance) is available on the website to the Board, staff, volunteers and other Partners.
- 4.6 Senior management are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice.

5. **RESPONSIBILITIES**

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

- 5.1 Board of Directors
 - 5.1.1 The Board are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Organisation's policies, aims and objectives.
 - 5.1.2 The system of internal control is designed to respond to and manage the whole range of risks that the Organisation faces.
 - 5.1.3 The system of internal control is based on an ongoing process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks.
- 5.2 The Financial Controller:
 - 5.2.1 Is responsible for establishing the internal control system designed to counter the risks faced. They are accountable for the adequacy and effectiveness of these arrangements. Managing fraud risk should be seen in the context of the management of this wider range of risks.
 - 5.2.2 Is responsible for making arrangements for investigating allegations of fraud. These arrangements include the appointment of a suitably qualified senior member of staff to lead the investigation.

- 5.2.3 Will be responsible for receiving the report of the investigating officer and considering an appropriate response.
- 5.3 The Financial Controller is responsible for assisting the Board member for finance to develop and maintain effective controls against fraud.
- 5.4 The Financial Controller and Deputy CEO will be responsible for enforcing the Organisation's anti-fraud policies, including, advising (or procuring advice) on whether it is appropriate for the Organisation to:
 - 5.4.1 instigate disciplinary and legal action (both civil and criminal) against the perpetrators of fraud;
 - 5.4.2 take disciplinary action against supervisors where supervisory failures have contributed to the commission of fraud.
- 5.5 The Appointed Investigator
 - 5.5.1 The appointed investigator shall be a senior member of staff, who will need to be familiar with the Organisation's disciplinary procedures, to ensure that evidential requirements are met during any fraud investigation.
 - 5.5.2 To carry out his/her duties the appointed member of staff will have unrestricted access to the Chair, the Board, the Financial Controller and the Finance, Strategy and Risk Sub-Group and the Audit Committee.
 - 5.5.3 They will be responsible for investigating allegations of fraud including:
 - (a) carrying out a thorough investigation if fraud is suspected, with the support of internal audit, where necessary;
 - (b) gathering evidence, taking statements and writing reports on suspected frauds;
 - (c) liaising with the finance manager and the Board member for finance where investigations conclude that a fraud has taken place;
 - (d) identifying any weaknesses which contributed to the fraud; and
 - (e) if necessary, making recommendations for remedial action.
- 5.6 Overall responsibility for managing the risk of fraud has been delegated to the CEO. Their responsibilities include:
 - 5.6.1 Undertaking a regular review of the fraud risks associated with each of the key organisational objectives;
 - 5.6.2 Establishing an effective anti-fraud response plan (current copy set out in Appendix 1), in proportion to the level of fraud risk identified;
 - 5.6.3 The design of an effective control environment in consultation with the Finance Director to prevent fraud;
 - 5.6.4 Establishing appropriate mechanisms for:
 - (a) reporting fraud risk issues;
 - (b) reporting significant incidents of fraud or attempted fraud to the Board.

- 5.6.5 Liaising with the Organisation appointed auditors;
- 5.6.6 Making sure that all staff are aware of this Policy and know what their responsibilities are in relation to combating fraud;
- 5.6.7 Ensuring that appropriate anti-fraud training is made available to the Board, staff members and volunteers as required; and
- 5.6.8 Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

5.7 The Senior Management Team ("**SMT**") is responsible for:

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

5.8 Line managers and Strategic Managers

- 5.8.1 Line managers are the first line of defence against fraud. They should be alert to the possibility that unusual events may be symptoms of fraud or attempted fraud and that fraud may be highlighted as a result of management checks or be brought to attention by a third party.
- 5.8.2 They are responsible for:
 - (a) being aware of the potential for fraud;
 - (b) ensuring that an adequate system of internal control exists within their area of responsibility, appropriate to the risk involved and those controls are properly operated and complied with; and
 - (c) reviewing and testing control systems to satisfy themselves the systems continue to operate effectively.
- 5.8.3 Managers should inform the SMT if there are indications that an external organisation (such as a contractor or client) may be trying to defraud (or has defrauded) or its staff carrying out their duties.
- 5.8.4 They should also inform SMT if they suspect their staff may be involved in fraudulent activity, impropriety or dishonest conduct.

5.9 Every member of staff or volunteer is responsible for:

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

- 5.9.2 Conducting themselves in accordance with the seven principles set out at paragraph 4.3 above;
- 5.9.3 Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- 5.9.4 Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
- 5.9.5 Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- 5.9.6 Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

6. **PREVENTION**

- 6.1 Fraud and corruption are costly, both in terms of reputational risk and financial losses, as well as time-consuming to identify and investigate, disruptive and unpleasant. The prevention of fraud is therefore a key objective. Measures should be put in place to deny opportunity, provide effective leadership, auditing, employee screening and student recruitment.
- 6.2 Fraud can be minimised through carefully designed and consistently operated procedures, which deny opportunities for fraud. Staff are made aware of policies through the induction programme and notification of policy updates.
- 6.3 Staff recruitment procedures require applicants to declare any connections with existing Board and staff. Members of staff recruitment panels are similarly required to declare such connections.
- 6.4 Volunteers at all levels are made aware of their responsibilities at their induction. Relevant policies and procedure are available to all staff and volunteer on the Organisation's website.
- 6.5 The Organisation's financial regulations help to ensure that at all times the financial management of the Organisation is conducted in accordance with the highest standards. Continuous management review of systems and reports by internal audit in line with the agreed annual audit programme should assist in preventing and detecting fraud; and should also result in continuous improvements. The risk of fraud should be a factor for consideration in audit plans.
- 6.6 The credibility and success of this Policy is dependent largely on how effectively it is communicated throughout the Organisation. To this end, details of this Policy will be provided to the Board, all staff and volunteers and be included in all induction programmes. The Policy will also be published on the Organisation's website.

7. **DETECTION AND INVESTIGATION**

- 7.1 Whilst having regard to the requirements of the GDPR, the Organisation actively participates in an exchange of information with external agencies on fraud and corruption. It is often the alertness of the Board, staff or volunteers to the possibility of fraud and corruption that leads to detection of financial irregularity.
- 7.2 The Chair of the Board and the Finance, Strategy and Risk Sub-Group must be notified immediately of all financial or accounting irregularities or suspected irregularities or of any circumstances which may suggest the possibility of irregularities including those affecting cash, property, remuneration or allowances.
- 7.3 Reporting of suspected irregularities is essential as it facilitates a proper investigation by experienced staff, and ensures the consistent treatment of information regarding fraud and corruption.

- 7.4 When so notified, the Chair will appoint an investigator as set out above. The appointed investigator shall:
- 7.4.1 deal promptly with the matter;
 - 7.4.2 record evidence received;
 - 7.4.3 ensure the security and confidentiality of evidence;
 - 7.4.4 work closely with senior managers and other agencies, such as the police and courts to ensure that all issues are properly investigated and reported upon;
 - 7.4.5 ensure maximum recoveries are made on behalf of the Organisation, and assist the senior managers to implement the Organisation's disciplinary procedures where considered appropriate (referral to the police will not prohibit or restrict action under the disciplinary procedure).
- 7.5 In cases of suspected payroll irregularities where a fraud investigation may be possible, discussion will occur between the Chair and the CEO if it is thought a disciplinary investigation is more appropriate.
- 7.6 Malicious accusations may be the subject of disciplinary action.
8. **DISCIPLINARY ACTION**
- 8.1 In the case of proven fraud, or suspected fraud of a serious nature, the Organisation will always refer the matter to the police and seek prosecution at the earliest possible juncture and recover any losses resulting from fraud, if necessary through civil action.
- 8.2 Following appropriate investigations, the CEO will determine whether to invoke action in accordance with the Grievance and Disciplinary Policy or staff policies (as appropriate).
9. **PERSONAL CONDUCT**
- 9.1 As stewards of public funds all staff must have, and be seen to have, high standards of honesty, propriety and personal integrity.
- 9.2 Staff are required to report any potential conflict of interest to the CEO (see separate Conflict of Interest Policy included in this good practice guidance).
- 9.3 Staff should not accept gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement and integrity.

APPENDIX 1

FRAUD RESPONSE PLAN

1. INTRODUCTION

- 1.1 The Organisation has established arrangements for the Board, staff, volunteers or other partners to report any concerns they may have without fear of prejudice or harassment. This applies to concerns relating to fraud and to any other concerns within the context of the Public Interest Disclosure Act 1998.
- 1.2 Concerns which should be reported include, but are not limited to, any member of the Board, staff, volunteers or other Partners committing or attempting to commit:
 - 1.2.1 fraud;
 - 1.2.2 any dishonest or fraudulent act;
 - 1.2.3 forgery or alteration of documents or accounts;
 - 1.2.4 misappropriation of funds, supplies or other assets;
 - 1.2.5 impropriety in the handling or reporting of money or financial transactions;
 - 1.2.6 profiting from an official position;
 - 1.2.7 disclosure of official activities or information for advantage;
 - 1.2.8 accepting or seeking value from third parties by virtue of official position or duties;
 - 1.2.9 theft or misuse of property, facilities or services.
 - 1.2.10 Other organisations' actions which should be reported include, but are not limited to:
 - 1.2.11 being offered a bribe or inducement by a supplier;
 - 1.2.12 receiving fraudulent (rather than erroneous) invoices from a supplier;
 - 1.2.13 reported allegations of corruption or deception by a supplier.
- 1.3 The Organisation has established and maintains this plan, which sets out guidance to senior staff in the event of fraud being discovered or suspected. Under the plan:
 - 1.3.1 incidents will be logged in a fraud register, which contains details of allegations, investigations and conclusions;
 - 1.3.2 frauds and allegations of fraud will be investigated by an appointed suitably qualified senior member of staff independent of the area under suspicion; and
 - 1.3.3 progress on investigations will be reported to the Chair of the Board as a standing item on the agenda.

2. **PURPOSE**

The purpose of the plan is to define authority levels, responsibilities for action, and reporting lines in the event of a suspected fraud or irregularity.

3. **INITIATING ACTION**

3.1 It is important that all staff are able to report their concerns without fear of reprisal or victimisation and are aware of the means to do so. The Public Interest Disclosure Act 1998 (the "Whistle-blowers Act") provides appropriate protection for those who voice genuine and legitimate concerns through the proper channels. See the separate Whistleblowing Policy included in the Good Practice Guidance for further details.

3.2 In the first instance, any suspicion of fraud, theft or other irregularity should be reported, as a matter of urgency, to your line manager. If such action would be inappropriate, your concerns should be reported upwards to one of the following persons:

3.2.1 The Chair of the Board;

3.2.2 Any Director; or

3.2.3 The CEO.

3.3 Suspicion of fraud or irregularity may be captured through a number of means, including:

3.3.1 requirement on all personnel under Financial Regulations as well as the Anti-Fraud Policy to report fraud or irregularity;

3.3.2 public interest disclosure procedure (the Whistleblowing Policy);

3.3.3 planned audit work;

3.3.4 operation of proper management and control procedures.

3.4 All actual or suspected incidents should be reported without delay to the SMT and the Chair of the Board, who should, as soon as practicable and preferably within two working days, convene a meeting (which may be by telephone). The following project group (save to the extent any are alleged to be connected to the fraud or irregularity in any way) or their nominees will decide what the initial response should be:

3.4.1 The Chairman of the Board;

3.4.2 The CEO;

3.4.3 The Financial Controller;

3.4.4 Others as determined by the Chair of the Board ("The Project Group")

3.5 Where the suspicion relates to the Chair, reporting should be done to the Vice-Chair of the Board.

3.6 The Project Group will decide on the action to be taken. This will normally be an investigation, led by the appointed investigator under the direction of the Project Group.

3.7 The decision by the Project Group to initiate a special investigation shall be under the delegated responsibility of the Board. The Project Group will also consider its membership and the need to include representatives from other specialist areas when appropriate.



- 3.8 Where an investigation is to take place, and the matter implicates any of the individuals in the Project Group, another person with senior management responsibility shall be appointed to the Project Group by the Chair of the Board.
- 3.9 Every effort will be made to protect an informant's anonymity where practical and permitted by law.

PART 6

CYBER SECURITY POLICY

1. INTRODUCTION

- 1.1 This Policy applies to all staff and any others, both voluntary and paid, working on the premises and/or under auspices. This Policy has been developed to protect Volleyball England's ("the **Organisation**") interests whilst ensuring the internet and e-mail services are being used effectively and productively in a secure environment as well as providing guidelines to assist employees in the proper use of the Organisation's facilities.
- 1.2 The Organisation provides access to the information resources of the Internet to help employees and volunteers undertake their roles and to be well informed. Internet and e-mail services provided by the Organisation are regarded as essential business tools and are provided in order to enhance employees' performance and not as a benefit of employment.
- 1.3 Using such services improperly can result in both the Organisation and the individual being open to legal sanction and it is therefore essential that all users ensure that they are aware of this Policy and their own responsibilities under it. Inappropriate use of the Organisation's communication systems, whether under this policy or otherwise, may lead to disciplinary action being taken against employees or volunteers. Such misconduct may result in disciplinary sanctions being applied including in serious cases, dismissal.
- 1.4 The Policy applies in relation to all personal computer equipment (PC's, laptops, palmtops, PDA's, mobile phones, removable drives, etc.) connected to the Organisation's network, internet and e-mail services, whether in the national office or working remotely.

2. GENERAL PRINCIPLES

- 2.1 Individuals are required to take reasonable steps to ensure the security and safe keeping of all equipment when working on the Organisation's premises and working remotely.
- 2.2 All material, which you intend to load onto any of the Organisation's systems via any attached peripheral (memory sticks, CD-ROM, Zip drives etc), should first be virus-checked. Virus protection software installed on the Organisation's computers should not be disabled under any circumstances unless expressly agreed with a line manager. If a virus is detected, all work on the PC must cease and a line manager notified immediately. Files that are open should not be saved nor should the employee try to close down an 'at risk' computer - this may cause more damage if a virus is present.
- 2.3 It is the responsibility of the individual to keep confidential their personal password(s).
- 2.4 In as far as it is possible individuals should ensure that the PC issued to them remains clean from unauthorised URLs, cookies or downloaded images.

3. RULES FOR USE OF THE INTERNET

Individuals are expressly prohibited from the doing any of the following, although this is not an exhaustive list.

- 3.1 Accessing the following categories or websites including:
 - 3.1.1 Adult and sexually explicit (pornographic) sites;

- 3.1.2 Sites containing material which may offend others for example because of its racist or sexist content;
 - 3.1.3 Sites promoting criminal acts and skills;
 - 3.1.4 Sites promoting hate speech or violence;
 - 3.1.5 Sites promoting illegal weapons;
 - 3.1.6 On line games;
 - 3.1.7 Pirate software sites; and
 - 3.1.8 Any site that places unnecessary burden on the Organisation's infrastructure or which is contrary to international or UK law.
- 3.2 Introducing packet-sniffing software (i.e. software which is used to intercept data on a network) or password detecting software unless it specifically relates to an employees' role within the Organisation and has been authorised by a line manager.
- 3.3 Seeking to gain access to restricted areas of the Organisation's or its customers'/members' networks.
- 3.4 Knowingly seeking to access data which an employee reasonably knows to be confidential unless authorised to do so.
- 3.5 Introducing any form of computer virus, worm, Trojan Horse or trap door programme code.
- 3.6 Using newsgroups without prior authorisation from a line manager.
- 3.7 Carrying out other illegal activities - for information, the following activities are criminal offences under the Computer Misuse Act 1990 – i) unauthorised access to computer material i.e. hacking; ii) unauthorised modification of computer material; iii) unauthorised access with intent to commit/facilitate the commission of further offences.
- 3.8 Should it become necessary to download any software, except from partner or supplier sites, employees must seek permission from their line manager or appropriate client authority who will determine that the source is safe and arrange for the files to be downloaded.
4. **RULES FOR USE OF E-MAIL**
- 4.1 The Organisation's email system should only be used for business related communications unless otherwise authorised by a line manager or the SMT.
- 4.2 Individuals must not:
- 4.2.1 Impersonate any other person when using e-mail or amend any messages received;
 - 4.2.2 Send any illegal e-mails. It is illegal to transmit material (including attachments) and statements which are:
 - (a) Fraudulent or part of an unlawful activity;
 - (b) Slanderous, libellous, defamatory, offensive, obscene, pornographic;
 - (c) Abusive or threatening violence, incitement to break the law; or

- (d) Harassment on any basis (including race, ethnic origin, nationality, religion, skin colour, sex or sexual orientation, disability or sensory impairment, HIV status).

5. SECURITY

Individuals are required to observe the following:

- 5.1 PCs / Terminals should be logged off the network when left unattended for any period of time. They should be switched off on leaving in the evening. PC's holding sensitive data must have a password installed.
- 5.2 If individuals are provided with computers which are portable in nature they must ensure that such computers, when not in use in the office or at home or when travelling are safeguarded against accident and theft when in transport. If left in a vehicle for any time they must be secured in a locked boot.
- 5.3 It is the Organisation's policy to lock laptops in a secure place at night and ensure the keys are hidden appropriately.
- 5.4 Where individuals are provided with User-ID's and passwords to access the Organisation's computer systems, they must not disclose them to anyone, unless expressly directed to do so by a manager. Passwords must be kept secret, changed often, of a no-nonsense type and NOT such words as: family names, pet names, car registration no's. It is suggested that passwords are between eight and fifteen digits long and contain upper and lower case, numbers and symbols such as - % &.
- 5.5 In the event that individuals encounter a computer virus, or suspect that they have, they should leave the computer as it is and immediately contact the office manager. Under no circumstances should the suspected infected computer be utilised.
- 5.6 Individuals are responsible for keeping their PC / laptop in a good state of cleanliness and ensure that they are not adorned with unnecessary decoration. They should take all reasonable steps to ensure that computers and data media are not exposed to damage from spillages.