



# **Compliance Handbook**

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## Who Are We and What Are We Doing Here?

The ASC helps everyone, no matter their age or ability, in the pursuit of improving their public speaking. Our Association makes people better speakers, not just through the assignment process, but because each club is a warm community that drives progress in a fun and entertaining setting.

To ensure that our work is a success, not just for our current membership but for that endless pool of potential members out there, it's important to remind ourselves of who we are and what we're doing here.

We are a voluntary organisation whose backbone is a legion of volunteers, giving their time up to help you make progress. Their every effort is centred around you, the member, as an individual and the growth and energising of our clubs. Everyone needs to value each other, supporting their fellow member through the turbulent journey that is improving one's ability to speak better.

Our feedback, whether it's in an evaluation or a consultation for a new proposal, needs to be kind and respectful. We're all in the same boat; the beauty of our Association is that every member, young or old, always has potential to take something new away from a club evening. Being an inclusive Association where all members feel equally valued and trusted is critical.

We're in the business of building people up, not tearing their small chunks of progress away. Most speakers won't have a plain sailing journey through the assignments; it's everyone's job to make sure they know what they could improve upon and come back with fresh energy and can-do spirit the next time they stand up to speak.

All these policies are geared towards one purpose only: making sure you are safe, secure, and valued in the Association. They are for the benefit of every member, whether you attend one meeting a month amidst a hectic work schedule, or you're an Area President with growth-boosting responsibilities.

Let's keep to that central goal: bringing the gift of confidence in speaking to as many as possible, with all the support and friendliness we collectively provide to one another each time we meet.

## Code of Conduct

The ASC wishes all members to enjoy a positive learning experience whilst being part of the Association. It therefore requires all members to behave in accordance with this Code of Conduct and Behaviour which articulates the ASC values, standards and expectations.

1. All members must abide by the ASC Constitution and Rules including those at Club, Area and Region level.
2. All members must adhere to prevailing ASC policies including, but not limited to, data protection, safeguarding of children and vulnerable adults.
3. All members must respect the rights of other members, regardless of age, gender, sexuality, disability, race, religion or any other protected characteristic.
4. All members are equal regardless of membership class and have one vote if so designated in the ASC Constitution and Rules.
5. All members are entitled to be treated with courtesy and respect at all times.
6. The ASC needs open, friendly and welcoming members. Members must be tolerant of the views and behaviour of other members. Members must be aware of the impact their behaviour may have on another member and be prepared to moderate their behaviour if asked to do so.
7. All members are entitled to be free of harassment, bullying and abusive behaviour. Harassment is any course of conduct from someone who either knows or should reasonably expect that that it will cause harm or distress to the recipient. Bullying or abusive behaviour is any behaviour which is intended or is likely to cause a person to feel uncomfortable. Please see the ASC Bullying and Harassment Policy.
8. In any organisation issues and disputes between members do occasionally arise. If a member wishes to make a complaint the ASC has a Complaints, Disputes and Infringements Procedure to be followed. Once the matter has been dealt with under this procedure all members must accept the conclusion and move on.
9. All members should act in a positive and constructive manner towards the ASC. Fair and reasonable comment is welcomed and should be directed towards the appropriate ASC office holder(s).
10. All members must take reasonable care over the health and safety of themselves and other members, including any events that may be organised.
11. Members must not bring the ASC into disrepute by their actions.

### Conduct of Office Holders

Office holders have the same rights as other members to enjoy their membership. Office holders take on a role and hence tasks on behalf of the ASC, which means they voluntarily give time and effort to ensure that their Clubs, Area, Regions run successfully. It is important that this is respected by all members, and other members support this work in a constructive way. The success of the ASC depends on all members contributing by organising and supporting the work of the ASC.

12. Office holders must act genuinely in the best interests of the ASC and its members present and future and must not act for any collateral purpose or sectional interest.
13. As a result of being a member of any Committee, members should not gain any additional benefit or advantage that is not generally available to all members, unless provided for under the Constitution and Rules.

14. If Committee members find themselves in a position where a conflict of interest arises, they should disclose it to the Committee and not take part in any discussions or votes on the issue.
15. Committee members must exercise reasonable skill and care in carrying out their duties.
16. Committee members are only entitled to act genuinely in pursuit of the stated aims of the Committee.
17. Committee members should be aware that their behaviour and conduct will be more prominent than that of ordinary members. Any behaviour which may undermine confidence in the Club, Area, Region or the ASC generally should be avoided.
18. Committee members may come across confidential or sensitive information about members. They must respect and keep confidential any such information, not just while a member of the Committee or a member of the club but for all time.

#### ASC Complaints, Disputes and Infringements Procedure

Members who appear not to be keeping to this Code of Conduct and Behaviour may be subject to the ASC Procedure for Complaints, Disputes and Infringements (CDI).

# Bullying and Harassment

## Introduction

The ASC is committed to providing an environment free from bullying and harassment. We aim to ensure that all members and officers are treated, and treat others, with dignity and respect. This policy covers bullying or harassment which occurs both in and out of meetings, including at competitions, events and social functions, whether in person or in some digital manner. This policy applies to all members at all levels including club, area and region and to national officers.

It is unlawful under the Equality Act 2010 to harass a person because of their age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. It also includes conduct of a sexual nature (sexual harassment). Harassment is unacceptable even if it does not fall within any of these categories.

The ASC has a clear written Code of Conduct and Behaviour which it expects members to comply with. Any breach of this policy is also likely to breach the standards expected by that code and may lead to action under the Procedure for Complaints, Disputes and Infringements (CDI).

## What is harassment?

Harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. A person may be harassed even if they were not the intended "target".

Examples of harassment include, but are not limited to:

- unwanted physical conduct including touching, pinching, pushing and grabbing
- unwelcome sexual advances or suggestive behaviour
- offensive e-mails, text messages or social media content or the display of offensive materials
- jokes, banter, mocking, mimicking or belittling a person that cause any member of the Association offense is unacceptable.
- using terminology, language and descriptions which could cause offence to members of the audience such as, but not limited to, sexist language, religious comment, political views, unacceptable labels and terminology

## What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Bullying can include the use of personal strength or power to coerce through fear or intimidation, not necessarily from someone in a position of authority.

Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media. Examples of bullying include:

- physical or psychological threats
- overbearing and intimidating levels of supervision
- inappropriate derogatory remarks about a person or their performance
- shouting at members
- persistently picking on people in front of others or in private;
- blocking opportunities for advancement within the organisation

- regularly and deliberately ignoring or excluding members, unelected and elected, from meetings or related social events
- setting a member up to fail by overloading them with work or setting impossible deadlines
- regularly making the same person the butt of jokes.

#### Breaches of this Policy

Bullying and harassment are not tolerated within the ASC and all members are required to treat each other with dignity and respect. Breaches of this policy will be dealt with in accordance with the CDI, the outcome of which could include suspension or expulsion from the ASC. Members who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under the CDI. Making a false allegation deliberately and in bad faith will be treated as misconduct and be likewise dealt with under the CDI.

#### If you believe you are being harassed or bullied

If you believe you are being harassed or bullied, you may wish to raise the problem informally with the person responsible. Explain the situation and how it has made you feel. It can be helpful to describe the event so the other person is clear about your concerns. Use the opportunity to ask the person to change or stop their behaviour. A member need not approach the person concerns if they feel uncomfortable or unwilling to do so and this is not a prerequisite to the matter being dealt with by the ASC.

Alternatively, you should speak to your club, area or district president who can provide confidential advice and assistance in resolving the issue formally or informally.

If you do not feel that informal steps are appropriate, or they have been unsuccessful, you should raise the matter formally to your district president and/or the National Secretary. All complaints will be investigated in accordance with the CDI.

Whether or not your complaint is upheld, we will consider how best to manage any ongoing relationship between you and the person concerned.

## Whistleblowing

The ASC is committed to the highest standards of openness, probity, and accountability. If a member discovers evidence of malpractice or wrongdoing within their Club, Area or Region, they can disclose this information to a nominated National Officer without fear of reprisal. As an Association, we are committed to encouraging and maintaining a culture where people feel able to raise a genuine safeguarding concern and are confident that it will be taken seriously.

### What is whistleblowing

This policy considers a 'whistleblower' to be someone who reports an activity that he/she considers to be illegal, dishonest, and or of a safeguarding nature. Examples of grounds for whistleblowing include, but are not limited to:

- fraud
- corruption
- illegal activities or conduct (including theft, violence, threatened violence, or criminal damage against assets/property belonging to the Association at a club, area, regional or national level
- discrimination, vilification, sexual harassment, harassment, bullying and victimisation
- any other improper conduct which may cause financial or non-financial loss to the ASC or be otherwise detrimental to the interests or reputation of the ASC, or any of its members
- deliberate concealment of information relating to any of the matters listed above

### Reasons for whistleblowing

Those involved in the ASC must acknowledge their individual responsibilities and bring matters of concern to the attention of the relevant people and/or agencies. Although this can be difficult, it is particularly important where the welfare of children may be at risk.

Each individual has a responsibility for raising concerns about unacceptable practice or behaviour to:

- protect or reduce risk to others.
- prevent a problem from becoming worse or more widespread.
- prevent becoming implicated yourself.

### Who do I tell?

The first person to whom you should report your suspicion or allegation is your Club President. If for any reason you cannot, or do not wish to, report to your Club President, you should refer to your Regional Coordinator. If you cannot, or do not wish to, report the information to either of these, then please contact the National Secretary by email at [national.secretary@speakersclubs.uk](mailto:national.secretary@speakersclubs.uk)

Specifically, do not:

- inform the person about whom the concern was raised.
- inform any other members or participants.
- commence your own investigation.
- annotate or remove evidence.
- delay in reporting the suspicion.



Also do not assume

- “all is well, otherwise it would have been spotted earlier”.
- “it doesn’t matter” or “no harm will arise”.
- “ignore it as it is not my responsibility”.

#### Information to include when raising a concern

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

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

The ASC will ensure that all involved will be treated fairly and that all concerns will be properly considered. In cases where suspicions prove to be unfounded, no action will be taken against those who report their concerns, provided they acted in good faith and without malicious intent. Although the ASC will investigate all allegations, anonymous or otherwise, it must be clear that any concerns or allegations that *are* anonymous are much less powerful and are therefore much harder to prove.

If the whistleblower was involved in the action(s) which was the subject of the disclosure, the fact that the whistleblower has made the disclosure may be taken into account in determining the severity of measures, if any, that may eventually be taken against them through the Complaints, Disputes and Infringements (CDI) Procedure.

#### What stops people from whistleblowing?

- Starting a chain of events which spirals
- Disrupting club meetings
- Fear of getting it wrong
- Fear of repercussions or damaging reputations
- Fear of not being believed

#### What happens next?

You should be given information on the nature and progress of any enquiries- this may vary depending on the nature and result of the investigations. All concerns will be treated in confidence. During the process of investigating the matter, every effort will be made to keep the identity of those raising the concern unknown, except to the minimum number of individuals practicable. Your Strategic Leadership Team, of which the ACO is a part, has a responsibility to protect you from harassment or victimisation. No action will be taken against you if the concern proves to be unfounded and was raised in good faith. Malicious allegations may be considered a breach of the Code of Conduct, initiating the CDI procedure.

The Public Interest Disclosure Act 1998 protects whistleblowers from victimisation, discipline, or dismissal where they raise genuine concerns of misconduct or malpractice.

If the whistleblower does not believe that the concern relating to safeguarding and/or child protection has been dealt with appropriately and wishes to speak to someone outside the ASC, then the NSPCC Whistleblowing advice line should be contacted on 0800 028 0285 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

# Safeguarding

## The purpose and scope of this policy statement

The purpose of this policy statement is:

- to protect children and young people who attend meetings and/or are members of the ASC from harm. This includes the children of adults who attend meetings and/or are members of the Association.
- to protect vulnerable adults who attend meetings and/or are members of the ASC.
- to provide all members, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

For the purpose of this policy, a child is a person under 16 and a young person is a person aged between 16 and 18. Additionally, the term "vulnerable individuals" is used to cover both children and vulnerable adults. A vulnerable individual may fall into any one of the following groups: young person under the age of 18; older frail people; people with a mental health need, a learning difficulty, a physical impairment, a sensory impairment; people who are substance or alcohol dependent, or family carers are providing assistance to another vulnerable adult.

This policy applies to anyone within the ASC, including members, club, regional, and national officers. It lays out the commitments made by the ASC and informs all members of their responsibilities in relation to safeguarding.

## Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England, Scotland, and Wales. A summary of the key legislation is available from [nspcc.org.uk/learning](https://nspcc.org.uk/learning).

## We believe that:

- children and young people should never experience abuse of any kind.
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

## We recognise that:

- the welfare of children is paramount in all the work we do and in all the decisions we take all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- working in partnership with children, young people, their parents, carers, and other agencies is essential in promoting young people's welfare.

## We will seek to keep children and young people safe by:

- valuing, listening to and respecting them.
- appointing a nominated child protection lead [the National Secretary] for children and young people, who will work in conjunction with the Strategic Leadership Team to promote safeguarding.

- adopting child protection and safeguarding best practice through our policies, procedures, and our Code of Conduct.
- ensuring our Strategic Leadership Team, Club Officers and Members are aware of our policies, procedures, and behaviour codes.
- recording, storing, and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from our Data Protection Policy].
- making sure that children and young people and their families know where to go for help if they have a concern.
- using our procedures to manage any allegations against members and officers appropriately.
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- ensuring that we provide a safe physical environment for our children, young people, and adult members, by applying health and safety measures in accordance with the law and regulatory guidance.
- building a safeguarding culture where adult members, children and young people treat each other with respect and are comfortable about sharing concerns.
- ensuring that children and young people under the age of 18 must not attend a speakers club meeting unless accompanied by a parent or guardian.

### Safeguarding Procedure

1. If you think abuse has or may have just occurred, act immediately. Make sure the person is safe. Inform the Club President immediately. They will contact the police if it is thought a crime has just been committed and record details of the allegation.
2. Bringing a concern to the attention of the Club President, who in turn will contact the Police or local authority referral agency. The Club President will contact the local authority referral agency or the police straight away.
3. The Local Authority referral agency or Police will coordinate an investigation. If necessary, they will hold a strategy discussion or meeting to decide what action to take next. You might need to give a statement to the local authority referral agency or the police. Social services or the police will decide what to do next.

### The Procedure in Detail

It is the responsibility of the person first becoming aware of a situation where there may be a vulnerable adult subject to, or at risk of, abuse to:

- **Make Safe:** deal with the immediate needs of the person. This may mean taking reasonable steps to ensure the adult is in no immediate danger and seeking medical treatment if required as a matter of urgency.
- Do NOT discuss the allegation of abuse with the alleged perpetrator.
- Do NOT disturb or destroy articles that could be used in evidence. Where an assault of some kind is suspected do not wash or bathe the person unless this is associated with first aid treatment necessary to prevent further harm.
- If the allegation is about a club member, ensure that the allegation is properly managed. The member or volunteer is also entitled to support at this stage but this will be the responsibility of the local authority referral agency or the police to source.
- **Inform-** tell another Club Member or the Area President if the Club President is unavailable or is implicated in the allegation. Contact the police if it is thought a crime has just been committed.

- Record- details of the allegation as soon as possible somewhere that can be kept secure. Include: the allegation or concerns, including the date and time of the incident, what the vulnerable adult said about the abuse and how it occurred or what has been reported to you; the appearance and behaviour of the victim and any injuries observed.

Contact details

Safeguarding Coordinator and Nominated Child Protection Lead

Name: Michael Cox

Email: [michael.cox120@gmail.com](mailto:michael.cox120@gmail.com)

Phone: 07467024024

# Data Protection

## Privacy Notice

As a 'data controller', the ASC must give to its members certain information, commonly called a 'privacy notice', about the sort of data it holds, the purpose for which it is used and individual's rights in relation to their data. The ASC's Privacy Notice reads as follows:

### The type of personal information we collect

We will collect and use your personal data (this means any information which identifies you, or which can be identified as relating to you personally, such as your name, address, phone number, email address or member number). We will only collect the personal data we need and we'll make it clear at the point of collection why we are collecting it.

This personal data you give us may include your name, title, address, email address, telephone numbers, payment information such as bank details and photographs.

### How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- identifying you and making sure your details are up to date.
- communicating with you about ASC matters.
- providing you with the ASC Speaker Magazine.

Such reasons form the basis for what we use the personal information that you have given us for.

We may share this information with the printers of the ASC Speaker Magazine, organisers of ASC events that you are attending and third-party mailing apps like Mail Chimp. We may also share your information with third parties, whose purpose is to assist the activities of the ASC. All third parties co-opted by the ASC must agree to the Third-Party Protocol, available in Appendix D of this Handbook.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting the National Secretary.

### How we store your personal information

Your information is securely stored on both secure cloud services and on the hard drive of the data controller. We keep your personal information for a period of four years after your membership with the ASC has ceased. We will then dispose your information by destroying any files related to you.

### Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.

- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact the National Secretary at

Michael Cox  
[michael.cox120@gmail.com](mailto:michael.cox120@gmail.com)

if you wish to make a request, you need to use our template subject access form which includes guidance on how to make your request, available in Appendix C.

#### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us via the National Secretary.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

## **Email Protocol**

### **Emails to National Officers from Regional, Area or Club Officers and Members.**

When writing to any National Officer, please ensure that you use your full email address and those for all recipients in the distribution list on the email. Blind copying-in of recipients is not recommended.

### **Emails sent from National Officers to Regional, Area or Club Officers**

Full email addresses will be shown in the distribution list.

### **Emails from National, Regional, Area or Club Officers sent direct to Members of Clubs**

For any emails sent direct to a member(s) of a Club, who is/are not an officer at Club, Area, Regional or National level, then the sender must enter members' email addresses in the BCC distribution list.

### **Emails to Third Parties from National, Regional, Area or Club Officers**

Please ensure that all officers' and members' personal email addresses are entered in the BCC section of the distribution list, when sending emails to 3rd parties, unless you have a generic email account. For example, [national.secretary@speakersclubs.uk](mailto:national.secretary@speakersclubs.uk)

## Archiving

On a regular basis, Club, Area, Regional and National Officers should either archive or destroy their data, being aware that there may be a small cost involved for supplying acid free packets and boxes, as well as storing hard drives.

For further details, please contact

Sharron McColl  
[sharronmccoll@hotmail.co.uk](mailto:sharronmccoll@hotmail.co.uk)  
01383 727491

Our Archivist makes the follow recommendations:

- Strategic Leadership Team: the minutes would be kept on an external PC Hard Drive, emailed to the Archivist and stored in the appropriate manner.
- General Council/AGM: this includes all the reports, AGM Minutes and Financial Statements. Recommendation to store and file in hard copy.
- National Directory: hard Copy and stored
- ASC Magazine: hard Copy and Stored
- Other Officers: it would be the responsibility for each officer to send the Archivist any new documentation they considered important e.g. New Certificates of Achievement etc.
- Regions: when any Region wishes to deposit their archive, the procedure should be as follows:
  - minutes which cover the Region;
  - most up to date Financial Statement at the time of the deposit. This would be kept in acid free boxes and maintained to a national standard of professional archiving.
- Areas: when any Area wishes to deposit its Archive, the procedure should be as follows:
  - minutes which cover the Area;
  - most up to date Financial Statement at the time of the deposit. This would be keep in acid free boxes and maintained to a national standard of professional archiving.
- ASC Clubs ongoing: if at any time during the normal running of a Club, it wishes to deposit its Archive with ASC, this would be done under the following conditions:
  - minutes which cover the Club Most recent financial statements
- ASC Clubs Closing: if a Club decides to close the Club should return/deposit:
  - all the Club minutes
  - last Financial Report – the Club has dispersed its funds as agreed by the Club members
  - The Club Charter and Regalia
  - The Club Trophies have been given to the last member of the club who won the club competitions.

Clubs may wish to deposit their history in to a Local History Collection in the town's Library, so it has become a part of the town's history, perhaps a more fitting way to use an archive. This has been successfully done with Matlock SC and St Margaret's Ladies SC. However, Club Officers must ensure that members' telephone, addresses and email addresses are not included in the archive and that written permission is received from the member(s) concerned to indicate that they are happy for their details to appear in the town archive.



## **Social Media**

The ASC, at national, regional or club level, may engage with social media. A non-exhaustive list of such sites include:

- Facebook
- Twitter
- LinkedIn

When a photo with a number of individuals is being taken, expressed consent can be taken without requiring it to be formally written. We will only publish photos of individuals when their consent has been recorded; this can be done by the relevant individual at a club, regional or national level. Photos with children, whether they are in a group or individually, must only be published with the written consent of their parent/guardian.

Individual members within the ASC have a number of rights relating to the ASC's use of photographs. These include, but are not limited to:

- *The right to be informed (articles 13 and 14)*  
The ASC will always be clear about the context of how photos are being used. For example, we will not use photos for social media if permission has only been given for the Speaker Magazine.
- *The right to access (article 15)*  
Individuals have the right to access their personal data (photos) on request and receive confirmation regarding how these are being used.
- *The right to erasure (article 17)*  
Individuals have the right to request photos be removed from websites, social media, or future versions of printed materials.

## Social Media

The internet and social media provide unique opportunities for interactive discussions and information sharing. However, use of social media can also pose risks to our reputation, and can jeopardise our duty of care to our membership. To minimise these risks and to ensure that our online platforms are only used appropriately, we expect ASC members to adhere to this policy. This policy may be amended at any time.

### Objectives

The ASC has a number of social media platforms. There are public facing Facebook, YouTube, LinkedIn, Twitter and Instagram accounts. There is also a private Facebook group, which is exclusive to ASC members.

The purpose of the public facing ASC social media accounts is to promote the ASC brand and provide useful, interesting or entertaining information relating to public speaking and leadership.

The purpose of the ASC private Facebook group is to create a supportive and friendly community of members interested in public speaking, leadership and the ASC.

All communications via social media should be in line with the ASC values, namely: supportive, inclusive, inspiring, educational and friendly.

### Roles

The overall management of the of the ASC social media platforms is the responsibility of the National Development Officer.

Day to day management and monitoring of each ASC social media platform is by those with admin, editor or moderator status for the specific page in question.

Posts by anyone other than those with admin, editor or moderator status will be subject to approval before they are published.

### Rules

Members are encouraged to engage with all the ASC social media platforms. ASC members are invited to share content, post their own content, comment and “like” content.

However, all posts and comments should comply with the following requirements:

- Comply with the provisions outlined in the ASC Code of Conduct and not breach those within the Bullying and Harassment Policy.
- Be kind and courteous. Try and create a welcoming environment and treat everyone with respect. Healthy debates are natural, but kindness is required.
- No hate speech or bullying. Make sure that everyone feels safe. Bullying of any kind isn't allowed, and degrading comments about things such as race, religion, culture, sexual orientation, gender or identity will not be tolerated.
- Respect each other's privacy. Being part of the ASC requires mutual trust. Authentic, expressive discussions are great but may also be sensitive and private. What's shared in the private group should stay in the group.
- No promotions or spam. Self-promotion, spam and irrelevant links aren't allowed.
- Never post offensive or libellous content and commentary and observe laws on copyright, trademarks, plagiarism and fair use.

### Complaints and issues

In the event that an ASC member or a member of the public should have concerns that something posted on an ASC social media platform breaches this policy, they should contact the National Secretary.

In the event that a concern is raised about content on ASC social media, the National Secretary shall carry out such investigation as is appropriate and discuss the matter with all parties concerned as well as the National Development Officer and the National President.

In the event that the content concerned is found to be in breach of this policy, the SLT has the right to use a number of sanctions depending on the severity of the breach, including:

- Instant removal of the content concerned
- Issue informal or formal warnings
- Removal of an individual from the ASC group
- Blocking of the individual from ASC social media platforms
- Reporting of the individual to the relevant social media platform
- Referring the matter to a panel as outlined in the Complaints, Disputes and Infringements (CDI) Procedure. The outcome of such an investigation may include expulsion from the Association.

# **Complaints, Disputes and Infringements**

The aim of this Procedure is to provide a fair, open and consistent method of dealing with any alleged failure to comply with the ASC's Constitution and Rules or the ASC's Code of Conduct and Behaviour.

## **1. Entitlement to Raise an Issue**

Any member Club, Area, Region or individual member within the Association having a complaint against, or dispute with, any other member Club, Area, Region or individual within the Association, having first unsuccessfully sought resolution at Club, Area and Region level (as appropriate), may raise the issue through the National Secretary specifying the complaint, dispute or alleged infringement of the ASC's Constitution and Rules or the ASC code of conduct and behaviour.

Equally the Strategic Leadership Team may raise with Club, Area or Region (as appropriate) a member Club, Area, Region or individual member's alleged infringement of the ASC's Constitution and Rules or the ASC code of behaviour and conduct. If the matter is not resolved at Club, Area or Region level, the following process shall be applied.

The Strategic Leadership Team reserves the right to invoke this procedure directly, omitting Club, Area and Region level, dependent upon circumstances.

## **2. The Complaint, Dispute, or Infringement**

Details of the complaint, dispute or infringement shall be sent by the member or ASC office holder in writing to the National Secretary. The details and nature of the complaint, dispute or alleged infringement must be set out clearly and include full supporting evidence.

If the alleged infringement has been raised by the Strategic Leadership Team having been unsuccessfully resolved at Club, Area and District, then details and nature of the alleged infringement will be set out clearly by the National Secretary and include full supporting evidence.

## **3. Appointment of the Panel**

Within 7 days of receipt of the complaint, dispute or infringement the National Secretary shall send copies to the Strategic Leadership Team who will convene a Panel. The Panel will consist of a non voting Chair appointed by the Strategic Leadership Team whose purpose is to advise the Panel of constitutional or any other relevant information. The Panel will include three others ASC members randomly drawn from a pool of all ASC Area officers excluding the member's own area. If any of the Panel has a perceived conflict of interest in respect of the matter raised they shall declare this to the Strategic Leadership Team who shall then appoint an alternative panel member(s).

The non voting Chair shall gather the evidence and share between individual members of the Panel in order to investigate the issues.

The National Secretary shall acknowledge receipt of the complaint, dispute or infringement to the member and/or ASC office holder as appropriate and confirm that the actions detailed above are being taken, setting out the anticipated timescale in accordance with Section 5.

Where the matter has been raised by the Strategic Leadership Team, and it is subsequently unresolved by Club, Area, and Region, then notification will be made to the member and relevant ASC office holder that the matter will now be dealt with under this Procedure.

#### **4. The Hearing**

The ultimate aim of any Hearing will be to bring about a resolution or a decision on the matter.

Once collection of the evidence has been completed and investigated, (normally no later than 28 days from receipt of the complaint, dispute or infringement by the National Secretary or an explanation provided as to any delay) a Hearing date will be fixed.

The hearing will be chaired by the non voting Chair.

All parties involved with the complaint, dispute or infringement (and any other person whose presence is deemed by the Panel to be necessary) shall be requested to attend the Hearing.

If a party decides not to attend the Hearing then that person will be invited to submit any further written information that he/she may wish the Panel to consider. This will be taken into account together with the evidence already provided when the Panel makes its decision.

The Panel shall not be held responsible for any disadvantage caused to any party involved in any complaint, dispute or infringement as a result of that party's perceived deliberate non-co-operation with the investigation and/or Hearing. Such perceived deliberate non-cooperation may be reported to the Strategic Leadership Team as constituting good cause for suspension or expulsion of the party concerned from membership of the Association.

The Hearing will be conducted in an inquisitorial as opposed to adversarial style.

Copies of the written decision of the Panel, other than suspension or expulsion, shall be sent by recorded delivery within 14 days of the conclusion of the Hearing to those parties involved in the complaint, dispute or infringement and to the National President and National Secretary. The written decision will include notification of the National Officer to whom any Appeal should be addressed.

If the Panel's decision is to recommend suspension and/or expulsion of the member from the ASC this must be submitted to the Strategic Leadership Team for endorsement before notifying the member and other relevant parties.

#### **5. Appeals**

An Appeal may be made to the National Secretary or named National Officer against the written decision regarding the complaint, dispute or infringement.

Any such Appeal must be lodged within 7 days of the receipt of the decision.

Any Appeal shall be in writing and shall include clear and detailed grounds on which the Appeal is based. Within 28 days of receipt (by the National Secretary or the named National Officer) the Appeal shall be considered by an Appeals panel consisting of a non voting Chair and 3 other ASC members as set out in paragraph 3. These members must not have any conflict of interest and must not have taken part in the process so far.

The Appeal Panel will be provided with: -

- i) All written paperwork which shall include the initial complaint, dispute or infringement; the evidence collected and the findings of the Hearing Panel.
- ii) All Appeal documents, which must include the reasons for Appeal.

The written Appeal Decision shall be sent in writing to the member and other relevant parties and shall include the reason for the decision.

## **6. Panel Decision**

The Panel has full powers to make any decision it feels appropriate upon conclusion of the Procedure including a recommendation to the Strategic Leadership Team for suspension or expulsion from membership of the Association.

Non-compliance with the decision of the Panel, endorsed if required by the Strategic Leadership Team, shall constitute good cause for suspension and/or expulsion in accordance with the Constitution and Rules of the Association.

**Appendix A: Review Log**

<b>Name of policy</b>	<b>Date of last review</b>	<b>Next review by</b>
Safeguarding	16-01-22	16-01-23
Data Protection	16-01-22	16-01-23
Complaints, Disputes, and Infringements	16-01-22	16-01-23
Code of Conduct	16-01-22	16-01-23
Bullying and Harassment	16-01-22	16-01-23
Whistleblowing	16-01-22	16-01-23





**Appendix C: Subject Access Request**

You have the right to ask us whether or not we are using or storing your personal information, who we are sharing it with, where we got it from and how we are using it. You can also ask us for copies of your personal information, verbally or in writing. If you wish to do this, please fill in the form below and send it to the National Secretary. We will respond to any request within one month.

Title	
Surname	
Former Surnames (to be included in the search)	
First name	
Address	
Telephone Number	
Email	

Part 2 Are you requesting information about you (i.e. are you the data subject)?

Please tick which applies

No – Go to part 3

Yes – Go to part 4

Part 3 Please complete if you are the person acting on behalf of the data subject (who has been identified in Part 1 above)

Title	
Surname	
Former Surnames (to be included in the search)	
First name	
Address	
Telephone Number	
Email	

As you need to have legal authority to request the data subject's information please provide a copy of one of the following:

Letter of authority

Lasting power of attorney

Other (please specify)

Part 4 Details of information being requested. To help us with your request, please provide details of the information that you require:

Please use separate sheet if required

Responding to you

We will respond to your request within one month. Where a request is complex or numerous, we may extend the deadline by a further two months. If this is the case, we will let you know within one month of the receipt of the request and explain why the extension is necessary.

## Appendix D: Third Party Protocol

Any individual or organisation working with, on behalf or as authorised by the ASC to act on the Association's behalf must comply with the following provisions to ensure GDPR compliance. Any such person or organisation will be described hereafter as the "third party" or "third parties". All third parties must indicate at the bottom of this notice that they have read and understood the contents and are willing to comply with them. Failure to do so automatically prohibits the third party from working with or on behalf of the ASC.

The ASC takes data protection very seriously and we thank you for your co-operation in advance.

### General background

The ASC does need to collect and use personal information about members but that information may only be used in strict compliance with our Privacy Notice. We recommend you familiarise yourself with this document which can be requested from [national.secretary@speakersclubs.uk](mailto:national.secretary@speakersclubs.uk). Our Privacy Notice sets out how we and any third parties must collect, use, and protect personal information and rights in relation to that information.

Personal information is information, or a combination of pieces of information, that could reasonably allow someone to be identified. The ASC has put in place measures and processes to protect the security of personal information and keep it confidential.

### Third party use and storage of ASC personal information

1. The data you hold on behalf of the ASC is not to be used for any purposes other than those specifically authorised by a member of the Strategic Leadership Team of the ASC.
2. Any personal information held by a third party on behalf of the ASC can only be used to:
  - a. identify someone and making sure their details are up to date
  - b. communicate about ASC matters the third party is authorised to deal with
3. The data held by the third party is not to be used for the third party's own purposes, such as marketing, promotion, etc, or in any circumstances to be sold or otherwise transferred to another party or organisation outside of the ASC.
4. Any third-party holding data collected in the course of their work on behalf of the ASC must:
  - a. have in place measures and processes to protect the security of personal information
  - b. keep the personal information confidential
5. The ASC are entitled to ask for full details of what measures have been put in place to comply with the above requirement. Failure to provide details will result in the termination of the permission granted to the third party to act on the ASC's behalf.
6. Personal information must not be transferred to, stored, and processed, in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law.
7. All data older than four years must either be destroyed or archived in accordance with our policy on archiving.

## Email

All third parties must comply with the following protocol:

1. When writing to any National Officer, please ensure you use your full email address and those for all recipients in the distribution list on the email. Blind copying-in of recipients is not recommended.
2. No third party is to correspond directly with any ASC members by way of email (including by way of Mailchimp and other similar platforms) without the express written consent of a member of the Strategic Leadership Team.

## Social Media

Third parties are invited to post to the ASC social media platforms, but all such posts should be in accordance with the ASC's compliance policies including social media, bullying and harassment and the Code of Conduct.

Being part of the ASC community requires mutual trust. Authentic, expressive discussions make groups great, but may also be sensitive and private. What is shared in the group should stay in the group. Social media is not the appropriate place to air grievances or complaints, which should instead be dealt with by the appropriate National Officer.

Any content that breaches the above, will be taken down immediately and the author may be banned from all ASC social media platforms.

Where social media is used no personal data, including the use of photographs and images, must be published unless specific consent has been obtained from an individual. The individual must be made aware of where a photograph or image will be published and give their positive agreement.

## Online Conferencing

All users of the ASC Zoom facilities must comply with the following requirements:

1. All requests for a meeting must be made via the National Secretary namely via email: [national.secretary@speakersclubs.uk](mailto:national.secretary@speakersclubs.uk)
2. Meeting links/invitations are to be sent using the ASC's private Facebook Group or via Messenger.
3. Email invitations to individual members are only to be sent with the express written agreement of someone on the SLT.
4. Email addresses should not be collected or stored by third parties as part of the processing of Zoom meetings unless absolutely necessary. If the third party deems it necessary, they should notify the National Secretary in advance.
5. Regional Coordinators and Area and Club Presidents should be reminded to avoid posting links to a Zoom meeting on a public facing social media platform and should be asked to communicate with their members via their usual channels.

## When third parties cease working with the ASC

1. When leaving your ASC post or ceasing work as a third party, you must arrange for all electronic and manual member data to be forwarded to the new incumbent, within 1 month of leaving the post.
2. If no replacement is appointed, all information must be passed to the relevant National, Regional, Area or Club Officer for them to retain, until a vacancy is filled (or if there is no incumbent, the National Secretary).

3. Within six months of standing down, third parties must confirm in writing to the National Secretary, that all member data, stored electronically, including backups, and manual files have been destroyed.

I confirm I have read and understood the above requirements. I also confirm I agree to comply with all of the above.

Signature

Date

**Appendix E: Flowchart explaining the Complaints, Disputes and Infringements Procedure**

