

GBS Telephony Policy

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Definitions

"Confidential Information" means any information or data not already

in the public domain;

"Email" means any email address and all functions

accessible by that address, including messages distributed by electronic means from one computer user to one or more

recipients via a network;

"GBS" means GB Snowsport Ltd.;

"GBS Athlete" means athletes who are part of a GBS

Team/GBS Squad;

"GBS CEO" means the Chief Executive of GBS;

"GBS Issued Phone" means a phone provided by GBS to GBS

Staff for business purposes;

"GBS Staff" means staff who are employed by, or acting

as a contractor or consultant to, GBS;

"GBS Volunteer" means volunteers who work for GBS

without pay;

"Internet" means the system of connected devices

that allows communication or the transferal of information, whether it be on a private or

public network;

"Line Manager" means the person with managerial

responsibility over any individual subject to

the Policy;

"Productivity Applications" means applications used within a GBS

capacity to aid in productivity. These may be applications such as messenger services for mobile phones to contact other GBS Staff, GBS Athletes, and GBS Volunteers;

"Social Media" Means all forms of social media that exist

now or may exist in the future. This includes (but is not limited to) Facebook, Twitter (X), YouTube, Instagram, Tumblr, LinkedIn, WhatsApp, Snapchat, Tinder, Flickr, Pinterest, Google+ and all other social networking websites, all other Internet

posting sites, blogs, and forums;

"Telephony"

means facilities such as a fixed line phone (analogue or digital/VOIP), a mobile phone (standard or smartphone), a conference phone, answering equipment, SMS services, voicemail services, pagers, or fax machines.

1. Introduction

- 1.1. This document contains the GB Snowsport (GBS) Telephony Policy (the "Policy") and is part of the GBS Officials' Code of Conduct and the GBS Athletes' Code of Conduct. The Policy sets out the standards of use regarding any telephony system by GBS Staff, GBS Athletes, and GBS Volunteers.
- 1.2. The purpose of the Policy is to ensure that you understand to what extent you may use the Telephony systems GBS provide, as well as any personal Telephony systems that are used in a GBS capacity or while conducting business on behalf of GBS.
- 1.3. Given the increasingly digital (and recordable) nature of today's telephony systems, it is possible for GBS Staff, GBS Athletes, and GBS Volunteers to misuse these systems intentionally or inadvertently for non-business purposes or in a careless or harmful way.

Aims

- 1.4. To explain how to use Telephony systems in a way that is not detrimental, unlawful, or offensive.
- 1.5. To avoid scenarios in which GBS can be accused of facilitating any detrimental, unlawful, or offensive action at any time.
- 1.6. To ensure that GBS' Telephony communications resources are managed efficiently and productively.

Scope

- 1.7. The Policy applies to all GBS Staff, GBS Athletes, and GBS Volunteers and failure to comply with the Policy will lead to disciplinary action in accordance with the GBS Disciplinary Policy. In addition, if your conduct is unlawful or illegal you may be personally or criminally liable with respect to civil and/or criminal proceedings, claims, or actions. GBS accepts no liability for legal breaches by GBS people regarding Telephony.
- 1.8. The Policy is designed to be read in conjunction with the GBS Officials' Code of Conduct, GBS Athletes' Code of Conduct, GBS Disciplinary Policy, GBS Internet and Email Policy, and the GBS Social Media Policy that are published by GBS. These documents may receive revisions and updates occasionally, with the most up to date versions being available on the GBS Website.

2. Monitoring

2.1. GBS reserves the right to monitor Telephony used on a GBS Staff, GBS Athlete, and GBS Volunteer basis. This will only be performed where there is a suspicion of behaviour which breaches the Policy. Any GBS Staff, GBS Athlete, or GBS Volunteer under surveillance will be informed, by the GBS CEO, that they are being monitored.

2.2. Monitoring must be:

- 2.2.1. Lawful, fair, and transparent.
- 2.2.2. the purpose of the monitoring must be specified, explicit, and legitimate.
- 2.2.3. the data collected must be adequate, relevant, and not excessive.
- 2.2.4. the personal data must be accurate and kept up to date.
- 2.2.5. If personal data is collected, it will not be kept for any longer than is necessary.
- 2.2.6. Information gathered through monitoring will be kept secure.
- 2.3. Anyone being monitored will be informed of:
 - 2.3.1. The nature and extent of the monitoring process.
 - 2.3.2. The reason for the monitoring.
 - 2.3.3. The impact of the monitoring on the business.
 - 2.3.4. How confidential or sensitive information is handled. (If any is taken)
- 2.4. Covert monitoring will only be performed in exceptional circumstances in line with data protection legislation and only when sanctioned by the GBS CEO.
- 2.5. All of GBS' resources, including Telephony systems are provided solely for business purposes.

3. Telephone and Mobile phone use

- 3.1. The use of telephones, mobile phones and voicemail within working hours should be cost effective and in keeping with the best interests of GBS.
- 3.2. Any incoming/outgoing telephone call or voicemail may be a member of the public's first point of contact with GBS. The first impression GBS gives when making/answering a call or voicemail should be an indication of GBS' professionalism. It is therefore important that all GBS Staff, GBS Athletes, and GBS Volunteers are aware of the Policy.
- 3.3. GBS Staff, GBS Athletes, and GBS Volunteers must:
 - 3.3.1. aim to be pleasant, informative, helpful, and brief when making or answering any calls, messages, or voicemail;
 - 3.3.2. not contain, or have attachments that contain defamatory, offensive or harassing language, fraudulent material, sexually explicit images or language, material that

infringes copyright or other intellectual property rights of third parties, or offensive cartoons or jokes or otherwise involve lawful or wrongful conduct in any call, message, or voicemail;

- 3.3.3. not transmit obscene, profane, or offensive calls, messages, or voicemail;
- 3.3.4. not broadcast unsolicited social or political calls, messages, or voicemails, or other non-business-related matters;
- 3.3.5. not solicit to buy/sell goods or services unrelated to GBS;
- 3.3.6. not leave voicemails containing personal information until after due consideration has been given to any security and confidentiality risks involved.
- 4.1. While working in a GBS capacity or conducting business on behalf of GBS, GBS Staff, GBS Athletes, and GBS Volunteers are encouraged to use either their own mobile phone or GBS issued mobile phones to make business calls, use Productivity Applications, and check emails and messages.
- 4.2. "Productivity Applications" may include messenger services such as WhatsApp to contact other GBS Staff, GBS Athletes, or GBS Volunteers. When using these applications, the GBS Social Media Policy also applies.
- 4.3. The versatility of mobile phones means that they can access the Internet, Email, and Social Media, as well as making phone calls and voicemails. For this reason, the principles of the GBS Internet and Email Policy and GBS Social Media Policy apply to mobile phones and any other Telephony device capable of accessing such things.
- 4.4. GBS Staff, GBS Athletes, and GBS Volunteers must:
 - 4.4.1. abide by the GBS Internet and Email Policy and the GBS Social Media Policy when using mobile phones;
 - 4.4.2. not download or upload inappropriate, illegal, or obscene material on a mobile phone issued by GBS;
 - 4.4.3. ensure mobile phones are turned off and not in view during competitions, meetings, or training events (or any other scenario in which exemplary mobile phone use should be demonstrated to other GBS Staff, GBS Athletes, and GBS Volunteers) in times in which mobile phones should not be in use. For example, when Athletes should be concentrating on their performance and not updating their Social Media feed while competing;
 - 4.4.4. not use mobile phones for any reason while driving unless using an approved hands free device:
 - 4.4.5. not use their mobile phone's camera or microphone to record GBS' Confidential Information.

5. Personal Use

5.1. Telephony systems must be used primarily for work-related communications while working in a GBS capacity or conducting business on behalf of GBS. GBS understands that GBS Staff, GBS Athletes, and GBS Volunteers may need to use personal Telephony systems, however, the personal use of Telephony systems should be "insignificant" and must be limited so as not to interfere with the GBS Staff, GBS Athlete, or GBS Volunteer's own responsibilities and GBS' productivity unless otherwise agreed with the relevant Line Manager.

6. Disclosure

- 6.1. With respect to the scope of the Policy, GBS Staff, GBS Athletes, and GBS Volunteers have a duty to report the following to the GBS CEO:
 - 6.1.1. persistent use of mobile phones for personal reasons;
 - 6.1.2. persistent downloading of illegal, obscene, or offensive material onto a GBS issued device;
 - 6.1.3. use of mobile phones while driving;
 - 6.1.4. any other breach of the Policy.

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