



Employee Handbook



Welcome to Galway Racecourse

On behalf of Galway Race Committee Trust, operating as Galway Racecourse (“the Company”/ “the Employer”) I wish to warmly welcome you as a new Employee to our company. We hope you will be happy working with us and look forward to working with you and to the contribution you can make to the delivery of excellence in horseracing/ events.

We place a high value on excellent and consistent customer service and client/ patron relations. As part of our approach, we encourage all employees to recognise the importance and individuality of each person they encounter and to treat each person they encounter with dignity and respect. In turn you will be treated with the same dignity and respect. As you learn more about our company and philosophy, we are confident that you will derive satisfaction from being a member of our team. We are a business that believes in ongoing development and our continuous improvement is in your hands and so, as a valued employee, your contribution, commitment, engagement and involvement is vital to the success of our business.

The terms and conditions that constitute your contract of employment have already been presented to you. The set of employee policies in this Handbook provides further details on the conditions of your employment, and forms part of the terms and conditions of your employment. All employees are required to take personal and individual responsibility to comply with the policies in this handbook, and any others of which you are informed. You are expected to behave in a safe manner and non-discriminatory way, not to participate in any acts of inappropriate behaviour and to perform to the appropriate standard.

From time to time it may be necessary to revise and alter the contents of this Handbook in line with legal requirements or company practices. These changes will be notified to you. In the event of any ambiguity or doubt as to the meaning of any statement on this handbook, a ruling given by the Chief Executive will be conclusive.

Whilst every effort has been made to ensure the accuracy of the information/ material contained in the Handbook, the Company assumes no responsibility for and gives no guarantees or undertakings concerning the accuracy, completeness or up to date nature of the information in the Handbook and does not accept any liability whatsoever arising from any errors or omissions. Any such errors or omission are entirely non-intentional however, should any employee notice any error or omission, please report same to us as soon as possible, whereby we will seek to clarify the matter for you and/ or update the Handbook when and where appropriate to do so.

Finally, we wish you every success in your career with Galway Racecourse and look forward to working with you.

Yours sincerely,

Michael Moloney
Chief Executive



About Galway Racecourse

Since its initiation in 1864 and to date, the Galway Races has had a long and exciting history and has become what is now one of the most famous tracks in the world. The Galway Races holds a very special place in the heart of many race-goers from across the globe, and indeed in the hearts of Galwegians themselves.

Beginnings

Records of organised race meetings in County Galway go back to the mid thirteenth century, when what were known as horse matches were run under King's Plate Articles. In 1864 there was a five-day race meeting at Knockbarron near Loughrea; and exactly 100 years later a Western Plate was confined to "gentlemen riders qualified for National Hunt Races at Punchestown or members of the County Galway Hunt".

The opening day at Ballybrit was on Tuesday, 17th August, 1869, when contemporary records show that 40,000 people turned up to watch the racing. The park at Eyre Square had to be used as a camping site for the huge crowds that arrived in the town well in advance of the two-day race meeting. The Chairman of the Stewards at the Meeting was Lord St. Lawrence, then M.P. for Galway and the man given most of the credit for creating Punchestown. His fellow stewards were all involved in the tradition of hunting and steeplechasing – men like the Marquis of Clanricard, Lord Clarmorris, Captain Blake Forster, Henry S. Persse, Pierce Joyce, George Morris and Valentine Black. Captain Wilson Lynch of Renmore gave the land at Ballybrit free of charge, and the racecourse, measuring one and a half miles was laid out by a civil engineer, a Mr. T. Waters. The Galway Vindication described it as "covered with herbage or moss and excelling any course in Ireland for good going.

There were eight events, four on each day, but the main attraction was the Galway Plate " .. of 100 sovs., an open handicap steeplechase of 2½ miles..." Eight jumps had to be negotiated, two of them stone walls. Tenant Farmers could race in the Glenard Plate (£50); and there was a Visitors Plate for gentlemen riders. There was wide advance publicity. The Midland and Great Western Railway agreed to carry all horses to and from the course free of charge provided they had run in a race – a great concession and a sure encouragement to entrants. Special trains came to Galway from all over the country and the Lough Corrib Steam Navigation Company ran a special service from Cong for the two days racing. A mounted official watched the racing on both days and jockeys were warned that "if found guilty of sly practices in riding that they would be disqualified".

Local prints describe the first day as "a magnificent success, with all honour to Lord St. Lawrence... " r. R. Bell's Absentee won the Galway Plate in a field of thirteen runners and Mr. John Ussher's Ishmael won the Ballybrit Plate and the Renmore Stakes. In terms of social success the meeting was a winner. The Vindicator commented: "The Galway Races promise to advance in the future equal, if not superior, to any other provincial races in the country".



In over one hundred years of racing at Ballybrit, the tributes paid to Lord St. Lawrence, the man who started it all, and the optimism expressed in local newspapers appear to have been deserved and well-founded. Galway Races have gone from strength to strength.

Many improvements were made for the 1870 meeting. A new Hunter's course with a "rattling double bank similar to the Punchestown bank" was constructed and additional fly fences erected. With the years the pattern and quality of the meeting improved. By 1879, Mr. Garret Moore's Liberator, ridden by the owner at Ballybrit, went on with the same rider to win the Grand National; and in 1898 another Galway Veteran, Drogheda, won the National from a field of 23. But the greatest Galway Plate runner was undoubtedly Tipperary Boy won the Plate three times – in 1899, 1901 and 1902. The only horse to come near this record was Clonsheever, who won in 1923 and 1924 but finished third in 1925 carrying 13 stone 1 lb.

The classic performances of East Galway in the late twenties and early thirties are still recalled by many enthusiastic Galway patrons. Having been successful with 12 stone 7lb, in 1928, this horse was given 12 stone 10lb the following year when he was narrowly beaten into second place and again in 1931 with 12 stone 7lb, he came fourth. When competing in the Blazer's Plate in 1933, he was still rated as one of the finest chasers in Ireland. One family kept up it's connection with Ballybrit right from the start, a connection which was broken only when Harry Ussher died in 1957. The Ussher Stables turned out seven Galway Plate winners, and in 1920 Harry Ussher trained the winners of all the races on the opening day – except the plate itself. Galway Races have always attracted fine steeplechasing bloodstock. Winners of the the Irish Grand National like Fair Richard and Red Park have been well tested over the course, and Ballybrit has seen winners of the Ulster Grand National, too.

Broadcasting of races commenced in 1929, and in that year, the Curragh Derby and Galway Plate were broadcast, and television arrived in 1963. Sponsorship came in 1959 and racing was extended to a three-day meeting.

The Papal Visit

The visit of His Holiness Pope John Paul II to Galway on the 30th September 1979 is one of the most memorable moments in the history of Galway and indeed the Galway Racecourse in Ballybrit.

It is estimated that 280,000 people flocked to Ballybrit to enjoy the papal visit. There were 77 concelebrants, 200,000 communicants with 800 priests distributing communion and 4,000 stewards.

There was a great air of expectation, excitement and calm amongst the 280,000 crowd awaiting the arrival on the papal helicopter. Flocks of people thronged to the racecourse with layers of clothes on, backpacks, plastic bags of food and flasks.

There were lots of people on the side of the road selling stools, large umbrellas and flags of all sizes.

The organisation and stewarding was superb as the stewards directed the people to their allocated “Corral”. Father Michael Cleary and Bishop Eamonn were a terrific double act, entertaining the huge crowd and getting them going. Never was “By the Rivers of Babylon” sung with such gusto, or by so many.

As the papal helicopter hovered overhead, the crowds waved excitedly. Children up on adults’ shoulders, flags waving, banners from every parish in the country, cheering. The intense excitement was eventually replaced by a spiritual calm as the mass got underway.

In his homily Pope John II said:

- “This morning the Pope belongs to the Youth of Ireland”.
- “I believe in youth. I believe in youth with all my heart and strength of my conviction, and today I say: I believe in the Youth of Ireland”
- “You carry in your hearts the treasures which Irish history and culture have given you, but you also share in the problems that Ireland faces”
- “On returning home, tell your parents and everyone who wants to listen, that the Pope believes in you and that he counts on you”.
- “Young people of Ireland, I love you”.

2005 saw the 25th anniversary of the papal visit to Galway and a special anniversary mass was held at the Galway Racecourse where 5,000 people attended. The archbishop of Tuam, Dr. Michael Neary was chief concelebrant and the Papal Nuncio, Giuseppe Lazzarotto along with Bishops and priests of the Western province took part in the Celebration. The Papal Nuncio Giuseppe Lazzarotto blessed the statue of Pope John Paul II which was commissioned by Galway Race Committee and erected in the racecourse enclosure to celebrate the Pope’s visit to Galway

Present Day

In over one hundred years of racing at Ballybrit, the Galway Races has gone from strength to strength with now in excess of 150,000 people attending the week long festival every year. Recognised as the greatest mid-summer festival in Ireland, punters from all over the world visit the famous race track year after year for a great mixture of racing and old Irish craic.

Our expectation is that all of our team members work independently, work as a team member and work collaboratively with our clients/ patrons to achieve the above vision and mission.



We hope you will enjoy being part of the Galway Racecourse team and experience.

For further information, please visit – www.galwayraces.com



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Section 1 - Recruitment and Selection

Galway Racecourse is an equal opportunities employer and we appoint individuals solely on the basis of their suitability and future potential for the job. We recognise that our organisation's performance and growth is dependent on appointing and retaining the most suitably qualified candidate for every position, taking account of education, experience and expertise.

We are committed to equality of opportunity and operate our recruitment and selection procedure in full compliance with all legal requirements. At all times, applicants will be treated in a fair and consistent manner, and discrimination will not be tolerated in respect of age, gender, race/ nationality/ ethnic origin, disability, family status, civil status, religion/ religious belief(s) (or lack thereof), sexual orientation or membership of the Traveller community.

Internal Recruitment

In order to provide opportunities for career development, we will favourably consider employees for internal vacancies and promotional opportunities *where possible*. We believe that everyone should have the chance to increase their knowledge, skills, responsibility and career prospects, and we encourage you to seek out opportunities as they arise.

All employees will be aware of the promotional and career opportunities available to them via the internal email system and/ or as may also be advertised externally. Training and job experience needed for promotional opportunities will be open to all employees. Promotional decisions are based on the employee's experience, qualifications and overall suitability for the position as well as ongoing business requirements.

We will aim to provide feedback to unsuccessful internal candidates, so as to facilitate improvement.

No employee will be overlooked in relation to a promotion or experience opportunity because of their reluctance to apply or accept on a previous occasion. The process surrounding promotion will be free from discrimination and consistent with our equal opportunities statement, as outlined above.

The opportunity and responsibility for career advancement also lies with an employee's initiative to seek out situations where their strong performance record and skills can be put to good use.

All relevant staff, including those on fixed-term and/ or part-time contracts, will have equal access to training opportunities, where training is relevant to their current job and/ or to enhance promotional opportunities.

The Company reserves the right to proceed directly to external recruitment based on business/ industry needs. The Company's decision will be final in this regard.

Promotion

Galway Racecourse is committed to attracting and retaining the best staff and encourages internal promotion. Applications for promotion are open to all employees in relation to all advertised vacancies. It is the organisation's policy where possible to promote staff who meet the experience, education and other requirements of the post. Employees are encouraged to prepare for advancement opportunities through training and development. Length of service does not automatically confer the right to promotion, but due consideration is given to experience and expertise when promotion is in question. In addition (per the above) the Company reserves the right to proceed directly to external recruitment based on business/ industry needs, and their decision will be final in this regard.



Employment of Relatives

As an equal opportunities employer, the company will consider applications from relatives, partners and friends of current employees, as it would any other application. However, the company retains the right to ensure that close relatives shall not be permitted to work in a position or department, where it is deemed inappropriate, especially where one relative would directly or indirectly supervise another. The Company's decision concerning the employment of relatives will be final.

Professional Membership & Qualifications

Where your role requires you to be a member of a professional body you may apply to the Company to fund or part fund the subscription/membership. Any decision which the Company makes to approve and subsidise professional memberships shall be at their discretion and does not constitute a contractual entitlement.



Section 2 - Conditions of Employment

General Terms

Employment with Galway Racecourse will be contingent on a number of conditions, including but not limited to:

- Legal eligibility to work in Ireland, e.g. copy of passport
- Receipt of satisfactory references
- Copy of driving licence (where applicable)
- Copy of qualifications (where appropriate)
- Declaration of medical fitness (which may impair/ impact on your ability to carry out your role safely; see below)
- Declaration of criminal offences (which may impair/ impact on your ability to legally/ lawfully/ legitimately carry out your role; see below)

Should you have a medical condition which may impair/ impact on your ability to safely carry out your duties (at the outset of and/ or during your employment), you are required to disclose same, in confidence, to the Chief Executive. The Company respects your right to privacy however, this request is made in the best interests of your health and safety. The Company will deal with any such matters in a fair and reasonable manner which is consistent with legislation and best practice.

Your employment with the Company is also conditional on not having been convicted of a criminal offence which may impair/ impact on your ability to legally/ lawfully/ legitimately carry out your duties with the company. If any such criminal proceedings are active or pending, you are required to disclose same immediately to the Chief Executive. Failure to do so may be a breach of the implied trust and confidence which underpins the employment relationship, and may result in disciplinary action being initiated against you (see Disciplinary Policy & Procedure, Section 7).

Terms and Conditions of Employment

The terms and conditions that make up your contractual arrangements with the company are detailed in your:

- Letter of Appointment/Contract of Employment
- This Company Handbook
- The Company's Safety Statement
- Other as may reasonably be introduced by the Company from time to time in the future

Given the nature of the ever-changing market environment within which the company operates, and the likelihood of changes to employment legislation and practices, alterations to company policies may occur which could affect terms and conditions of employment. The company, therefore, reserves the right to alter or modify terms and conditions. Such changes will, at all times, be covered by employment law and/ or best practice and/ or dictated by business/ industry needs and, following consultation (if/ when/ where appropriate), will be notified to employees within legal requirements.

Holidays, Annual Leave

Galway Racecourse recognises that employees need time for rest and relaxation, outside of work and are committed to meeting our legal obligations in this area. Our annual leave year extends from 1st January to 31st December each year.

The company grants 20 days holidays to full-time employees. Employees who join during the holiday year will receive a pro-rata holiday entitlement for the first year. Part-time, temporary and fixed term employees will have their annual leave entitlement calculated on a pro-rata basis with reference to the number of hours worked.

Notification



In general, written notice of holidays is required as follows:

<u>No. of days leave</u>	<u>Minimum Written notice required</u>
1 day	1 weeks' notice
2 – 5 days	2 weeks' notice
1 week	1 months' notice
2 weeks	1 months' notice

In general, your Manager/ the Company will approve requests for annual leave on a 'first come, first served' basis however business needs will also be taken into account.

In general, the company cannot grant more than two consecutive weeks (ten working days) of annual leave at any one time. Before making a holiday commitment (e.g. foreign travel), employees must consult with their manager.

Your manager has to give their approval for all leave applications in advance, and whilst every effort, consistent with the efficient working of the company, will be made to grant leave for the period requested, this cannot be guaranteed.

It is company policy that all holiday entitlements must be taken in the leave year in which they fall due and days can only be carried forward into the next leave year by exception/ approval from the Chief Executive; it is entirely at the Company's discretion whether to allow/ approve the carrying forward of unused annual leave.

An employee cannot forego any period of annual leave and be paid salary in lieu, except in the case of termination of employment.

There is no entitlement to take annual leave above your annual leave entitlement. The company will not be in a position to approve additional days of annual leave, even if they are to be taken at the employees' own expense (e.g./ i.e. unpaid leave).

Sickness during Holidays

Any day of sickness covered by a medical certificate, which falls within the normal holiday period (including public holidays), is not counted as part of holiday leave. However, if you are medically certified as sick during a period of annual leave, you must inform your manager immediately (i.e. on the first day of your certified sick leave and in accordance with the normal notification procedures). On return to work you must provide a medical certificate that outlines the dates and nature of the illness.

Arrangements on Termination of Employment

When an employee is leaving the company, any additional holidays due will be included in the final pay. When an employee is leaving, and the paid holidays exceed the paid holiday entitlement as at the date of termination, the company will deduct the excess holiday pay from their final pay.

Intention to Take Holidays

The company maintains the right to determine when an employee takes annual leave, by providing appropriate advance notice of no less than 4 weeks.

Company Days

Company nominated days are those days which the company will elect that employees are required to take as holidays; these are usually in and around the Christmas period. You will be required to reserve up to 5 days of your annual leave entitlement to use around Christmas, subject to the rota and any days on which you might be required to work for business needs.

Public Holidays



All employees are entitled to the benefit of nine public holidays in line with current practice and government regulations. These are:

- New Year's Day (1 January)
- St. Patrick's Day (17 March)
- Easter Monday
- First Monday in May
- First Monday in June
- First Monday in August
- Last Monday in October
- Christmas Day (25 December)
- St. Stephen's Day (26 December)

Part time employees will receive a pro rata benefit for a public holiday provided they have worked for at least 40 hours in the preceding five weeks up to the day before the public holiday.

In the event that an employee is required to work on a public holiday, the following will apply:

- The employee will be given as much notice as reasonably possible of the company requirements to work the public holiday
- The employee will be provided with an extra day of paid leave in lieu of the public holiday or one additional day's pay, which will be at the discretion of the Company

Good Friday

Please note that, whilst not a public holiday, Good Friday is also given as a paid day off for employees.



Working Hours and Time Keeping

The purpose of our working time policy is to communicate the company's commitment to the health, safety and welfare of all employees regarding their working time.

The normal working week is 9 am to 5 pm Monday to Friday (office staff) and 8.30 am to 5 pm (grounds staff), with a 30-minute paid morning break and a daily lunch break of 1 hour, which is unpaid, however individual employees' working hours may vary as agreed with the Company.

If you are unable to take a rest break in your job, you must notify your Manager in writing (within one week) that you were unable to take this break. Your Manager will look at the reasons why you were unable to take your break and at any health and safety issues that might or have arisen relating to you and your job. If you do not notify your Manager within one week you will forfeit that break. If after investigation you are offered the break and refuse, you are at fault and the Company is not obliged to offer you a further rest break. However, we do ensure employee's rest breaks are taken.

Each employee is entitled to a minimum of 11 hours consecutive rest per day. Every employee must take a complete day's rest once a week, preceded by 11 hours daily rest.

As per each employee's contract of employment, from time to time business dictates the need for you to be flexible in your hours of work. Each employee must be prepared to allocate any additional time necessary to fulfil their role, meet deadlines and complete any tasks reasonably requested at the discretion of the company. In the event that employees are required to work extra hours, every effort will be made to ensure that they are given prior notice as soon as possible to enable them to work.

There is a legal requirement to ensure that employees do not work more than an average of 48 hours a week over a defined reference period. To enable us to regulate all employees' working hours you are required to record your working hours from the time you start work each day to completion time. You will be given details of the system we use to record working hours by your manager, which may be amended from time to time. Failure to record hours will be regarded as a non-compliance with company policy and is therefore subject to the disciplinary procedure.

All employees are expected to be reliable and punctual in reporting for work. If you are sick you must contact your line manager no later than 8.30 am on the first day of your sickness. Direct verbal contact must be made, and text messages and/ or messages passed on by a family member or work colleague will not be accepted. You are required to outline your likely return to work date during the initial contact. In the event that your illness continues you are required to contact the company no later than 9.30 am on the date you were due back to work, outlining the revised return to work date.

Note – see separate section below re. Sick Leave & Absence Management.

Double Employment

It is a condition of your employment that you do not work for, nor have any interest in any other company or business, nor undertake any other activity which might interfere with the proper performance of your duties or compete in any way with the company's activities without first obtaining, in writing, the consent of the Chief Executive.

Where permission is granted there is a legal requirement for the company to ensure that an employee working outside the company in his/her own time does not exceed the maximum 48-hour average working week. Therefore, all employees are required to inform their manager, in writing, should they currently, or intend in the future, to carry out a second job, stating the days/hours of work. Regular reports will be required thereafter.

Overtime

Individual contracts of employment will detail terms and conditions in relation to overtime where relevant/ applicable. Flexibility will be required in this regard.

Time Keeping



It is company policy to implement a high standard of time keeping across the company in order to facilitate the effective running of the business.

The company expects all employees to be reliable and punctual in reporting for work. All employees are paid on the basis of the hours specified in their contracts of employment and are required to commence and finish work at the designated times. The management has the right to manage time and attendance. Punctuality in terms of employees going to and returning from meal breaks is also essential. Employees not at their workplace at the appointed starting times, or who leave their work place prior to the designated finish time, are considered to be late arrivals or early leavers. Punctuality and efficient timekeeping is essential, as it reflect on the professional image and reputation of Galway Racecourse.

If an employee has a record of lateness/ early leaving this may, depending on the circumstances, be reflected in a coaching session / performance review. If the problem persists, the disciplinary procedure will be invoked.

Right to Disconnect

Galway Racecourse recognises the importance of work/ life balance, and recognises the following:

1. The right of employees to not routinely work outside normal working hours
2. The right to not be penalised for refusing to do work or attend to matters relating to work outside of normal working hours
3. Respect another's right to disconnect

Whilst the Company may occasionally/ infrequently require employees to work additional hours, given the nature of the business/ industry (e.g. during race week), this will not be a routine requirement and will generally be a) on exceptional grounds and b) be infrequent. Such requirements will in most cases be mutually agreed between the company and the employee.

If emails or other communications are sent outside of normal working time, then the tone and sense of urgency must be considered and be proportionate (by the sender), so that there is no misinterpretation on the part of the recipient.

In the event that you have any concerns or queries about the Company's commitment to honouring your right to disconnect, please inform the Chief Executive immediately.

Probationary Period

All new employees are required to satisfactorily complete a probationary period. Employees should refer to their contract of employment for details of their specific probationary period.

During this period, performance on the job and potential abilities are evaluated to determine suitability for the position and the company and the employee's immediate Line Manager will provide support, guidance and feedback to the employee during this time.

During and at the end of this probationary period, a review of your performance during the probationary period will be conducted, which may involve an informal and/ or formal reviews with you. If your performance is found to have been satisfactory during the probationary period, your position will be confirmed.

The company reserves the right to extend the probationary period of an employee, should this be deemed necessary, for example in order to adequately evaluate the individual's overall suitability to the position and the company going forward. The employee will be informed of any decisions in this regard.

During the probationary period, either party may terminate the contract by giving one weeks' notice in writing. The Company, at all times, reserves the right to pay you your basic salary in lieu of notice, except in the case of summary dismissal outlined under the disciplinary procedure (see below under Disciplinary Policy & Procedure).



Short-time /Lay-off

Purpose of Policy

The purpose of this policy is to outline the procedure that will be followed in the event that short-time or lay-offs are required.

Scope of the Policy

This policy applies to all employees who are working under a contract of employment and are on the organisation's payroll.

Notification

Short-Time

Short-time working is a temporary arrangement which may be necessary should the organisation experience a reduction in available work, for example due to the emergency/ unforeseen cancellation of events. In such circumstances, the organisation may need to implement short-time working. This involves the organisation either reducing an employee's earnings to less than half the normal weeks' earnings or reducing the number of hours an employee has to work to less than half the normal weekly hours on a temporary basis. However, reduced hours/ short-time may also be implemented in a form which does not necessarily amount to a reduction of more than 50% of earnings/ working hours. During this time, the employee will only be paid for hours actually worked.

Lay-off

A lay-off is a temporary arrangement which may be required should the organisation experience a reduction in available work, for example due to a pandemic. Should this occur, the organisation may need to implement lay-offs. This will involve the suspension of employment of an employee, or a number of employees, on a temporary basis. During this time, the employee will not receive payment.

Duration of Short-Time or Lay-Off

Short-time working and lay-offs are temporary arrangements and the organisation will endeavour to minimise the duration of these periods.

Procedure

In the event of the need to introduce either short-time working or lay-offs, the organisation will notify, as soon as is reasonably practical, all relevant employees. The organisation will outline the reason for the lay-offs or short-time working and will also confirm the date from which it becomes effective. The organisation will adhere to all statutory requirements and will provide all relevant employees with the appropriate documentation. The organisation will endeavour to keep employees informed of developments relating to these reduced working arrangements and their possible duration.

Returning to Work following a period of Short-Time or Lay-off

In the event that the situation improves in the organisation and that the organisation requires you to resume full-time/ normal working, the organisation will notify you in writing, as soon as is reasonably practical, of the date and time you will resume full-time/ normal working. Normal remuneration and benefits will return to what they were before the short-time/lay-off situation. Please note that you are expected to resume your full attendance within 7 working days of notification. Failure to do so will be considered a breach of Company policy and failure to carry out the terms of your contract.



Redundancy

In the event that the situation does not improve the organisation may have to consider implementing redundancies, however all efforts will be made to avoid this situation arising.

Please note that the Company's decision to implement lay-off or short-time prior to any other measures such as redundancy will be at their discretion. The Company is not obliged to consider/ implement lay-off and/ or short time prior to taking any other measures.

Dress Code and Personal Hygiene Policy

Employees should ensure that they adhere to suitable standards of personal appearance and grooming at all times, and dress in clothes that are suitable for the work situation, in order to present a professional image to our clients/ patrons.

Office based employees are required to wear smart casual/ appropriate professional work attire during work. Grounds personnel are required to wear appropriate uniforms including health and safety related PPE (Personal Protective Equipment).

We require that everyone in the company take responsibility for their personal hygiene and adequate grooming, so as not to cause discomfort for other employees. It is your responsibility to maintain a high standard of hygiene at a personal level and in all work areas, and to observe all regulations prescribed for health and safety purposes.

Use of Company Phones

Business telephones, mobiles and the use of internet on mobile phones are not for private use. Where there is an emergency or a specific business need, then personal calls and use of the internet can be made/taken/used during business hours. Abuse of this facility may lead to disciplinary action.

Telephones are essential for our business. Incoming/outgoing personal telephone calls are allowed but should be kept to a minimum. We reserve the right to recharge for excessive personal use.

Company Mobile Phones

If you have been issued with a Company mobile phone:

- you are responsible for the safekeeping and condition of the phone at all times and you will be responsible for any cost of repair or replacement other than reasonable wear and tear;
- unless there is prior approval from Management, no staff member is allowed to call any premium numbers (e.g. Directory enquires) or International calls or use the internet facility on mobile phones;
- in the event that the phone is lost or stolen, the Company must be notified immediately in order to cancel the number and arrange for a replacement;
- upon termination of your employment, if you do not return your Company mobile phone or should your phone be returned in an unsatisfactory condition, the cost of replacement or a proportionate amount of this, as decided by the Company, will be deducted from any final monies owing to you, or you will otherwise reimburse the Company;
- ensure a PIN lock is maintained on all mobile phones which have access to corporate/ company data;
- where it is deemed that an unreasonable amount of personal calls/Internet usage has been made using the mobile phone, the Company reserves the right to deduct those costs through payroll. Excessive use, or a breach of this policy, may also result in disciplinary action.

Personal Mobile Phones



Personal mobile phones should be switched off or 'on silent' during working hours and only used during authorised breaks, unless required for business purposes. If not required for business purposes, you may keep your phone on your person for emergency situations only.

Excessive use of mobile phones for personal phone calls during official working hours is in breach of the conduct procedures and may result in disciplinary action.



Section 3 – Quality & Customer Service

The purpose of this section is to set down the general principles and standards, which govern the professional activities and conduct of all staff of Galway Racecourse. This section should be read and used alongside the policies applicable in the Company, particularly Dignity at Work Policy, Health and Safety at Work, Grievance and Disciplinary Procedures, Confidentiality Policy and Acceptable Use of Computing Resources Policy and all other policies adopted by Galway Racecourse.

Customer Care & Code of Conduct

Staff have an obligation to attend at work as required and perform their official duties honestly, faithfully and efficiently, respecting their colleagues, clients and members of the public. Staff should be aware of and fulfil all regulatory and statutory obligations and enforce them in a fair, responsible and consistent manner acting within the authority given to them.

At Galway Racecourse, all our team are expected to take on a managerial attitude. This involves looking for problems, finding solutions, bringing the solution to the table and managing the resolution of the problem. The approach of each staff member to this solution finding culture is to be innovative, thorough, and to always put our clients/ patrons first.

At Galway Racecourse, we acknowledge that a staff member can make an occasional mistake. Although we understand that human error can occur, it is not acceptable for the staff member in question not to take ownership of that mistake and approach our management team to find a solution as a team, at the earliest opportunity/ at the onset of the employee becoming aware of the mistake.

English is the working language of the Company. An employee is expected to be respectful towards others in their use of language and avoid unkind, uncouth, derogatory or labelling content.

All Employees are expected to maintain high standards of behaviour and conduct while carrying out their duties. You must respect the equality rights of others and you are expected to:

- Use your time positively and constructively;
- Be approachable and pleasant;
- Make others welcome and valued;
- Show respect to people from all ethnic, religious, cultural and social backgrounds.

Employees are expected to be respectful towards others, including but not limited to colleagues/ patrons, during the course of their employment and any language that might undermine a colleague's/ patron's right to dignity at work/ during the course of employment will not be tolerated by the Company.

Please see the Section in this handbook entitled 'Dignity & Respect' for further information on Company policies and expectations.

Business Ethics and Confidentiality

The company requires all staff to display a primary duty of care to the company in respect of business ethics and to protect confidential business information to ensure our continued business success and growth. It is the policy of the company to consistently conduct its business with honesty and integrity and in compliance with all legal and ethical standards, together with established company policies. Each employee is also required to conform to a high standard of ethics in relation to business activities with both patrons and suppliers.

The company is committed to policies and practices that provide equality of opportunity for all, protect the dignity of employees and promote respect for others at work. All employees are required to take personal and individual responsibility to comply with these policies and behave in a non-discriminatory



way and not to participate in any acts of inappropriate behaviour, harassment or bullying. All employees must have due regard for the health and safety of themselves, their colleagues and the company's workplace in general.

All employees are required to be aware of the Company's Information Security Policy, the classes of information therein, and how to treat and deal with, and protect, the different classes of information, i.e. Confidential, Restricted, Private & Public. This policy should be reviewed in conjunction with this handbook.

All employees are required to protect company confidential business information and not disclose it to other parties. You may not remove any documents or items belonging to the company or which contain any confidential information from the company's premises at any time without proper advance authorisation from management.

Key Principles of Confidentiality at Galway Racecourse:

- Employees shall observe strict confidentiality and will not disclose any information in respect of our patrons
- Employees shall treat all information received from the Company as highly confidential and agree that no such confidential information will be disclosed, either directly or indirectly, in any form whatsoever to any third party and
- Employees shall not use any confidential information for their own benefit and shall only use it to assist them to carry out their duties as an employee of the Company and
- Employees shall store all work which they complete in a safe and secure manner, in accordance with the instructions of the Company's and in accordance with the Company's IT systems, policies, practices and procedures and shall report any breach, suspected breach or anything which may compromise or have the possible effect of compromising business confidentiality to the Chief Executive of the Company immediately.

Conflict of Interest

Employees are not allowed to engage in or be connected with, any outside business or organisation which conflicts with the interests of the company. Employees must declare in writing any potential conflict of interest that might affect their impartiality in carrying out their duties. Subject to expressed written permission from the Chief Executive, employees may be entitled to pursue other business activities/financial interests outside normal working hours.

Gifts & Gratuities

Employees must not accept gifts or favours from patrons or suppliers which could compromise them and/ or which would be for their personal use, gain or benefit. If in doubt, please speak with and seek clarification from the Chief Executive.

Unjust enrichment: Unjust enrichment must be strictly avoided. This principle prohibits an employee from gaining any advantage, other than official remuneration in respect of his / her duties e.g. acceptance of special facilities or discounts on private purchases from suppliers with whom the employee has official dealings.

All persons employed by the company have a duty to promptly report to his/her manager any evidence of any improper conduct or practice of which they are or become aware. Improper conduct means any illegal, fraudulent, dishonest, negligent or otherwise unethical action arising in connection with the company's business; see Protected Disclosure Policy & Procedure below. Employees should be aware that they will not be penalised or victimised for any such report that they make, however they should also be aware that malicious and/ or vexatious complaints may be dealt with under the Company's disciplinary procedures.

Intellectual Property



Copyright in all writing, materials, processes, etc. created and produced by employees while employed by the company are vested in the company. It is a condition of employment that employees assign all rights of copyright, both current and future, to the company for the full period of the copyright, including extensions and renewals thereof.

Any employee who discloses trade secrets or confidential business information (including intellectual property) whether while employed or after ceasing to be an employee, will be subject to disciplinary action (including possible discharge) and legal action, even if he/she does not actually benefit from the disclosed information.

At all times employees must behave with honesty and integrity and respect the rights and privacy of others in relation to electronic communication and information. It is the responsibility of each employee who utilises electronic communications to safeguard company information assets by understanding and complying with all policies in this area. The company reserves the right to monitor all electronic communication and files, which are the property of the Company, and not of the employee.

Upon termination of employment, employees shall properly deliver up to the company all manuals, employee handbook, letters, notes, notebooks, reports and all other materials of a secret or confidential nature or under the control of the employee. They remain at all times the property of the company.

Use of Company Resources

In performing their duties staff must apply public resources prudently and only for the purpose for which they are intended. They must not use their position to pursue private interests using resources of Galway Racecourse. Staff should ensure that resources provided are used economically for the purpose for which they were provided, treated with care, maintained and properly secured against theft or misuse. Resources include material and financial resources, staff time and skills, intellectual property and official information.

Breaches of the Company's policy on Customer Care & Conduct and/ or Business Ethics and Confidentiality (and other company procedures) will be regarded as a breach of discipline and will be dealt with in accordance with the company's disciplinary procedures.

Protected Disclosure Policy and Procedure

If you have information that suggests that there may be some wrongdoing or corruption in relation to some aspect of our business, you should make this known at a suitably senior level, i.e. to the Chief Executive of the Company. The organisation has developed this policy to encourage workers to come forward with concerns they may have. This policy does not replace our grievance procedure and, depending on your concerns, you may be referred to the Grievance Policy & Procedure or the Dignity at Work Policy. You can always raise a grievance through the company's Grievance Procedure, but you may feel that if you are "whistleblowing" i.e. *telling your employer of dangerous or illegal activity that you are aware of through your work* then you may feel that this makes your position difficult. We have therefore provided a procedure for you to report serious concerns directly to Senior Management so that they can be resolved confidentially and effectively.

Under the Protected Disclosures Act 2014 the organisation takes any reports of wrongdoing extremely seriously and will complete an investigation into the concerns. The company will ensure that you are kept up to date in relation to the progress and the findings of the investigation. At all times the organisation will comply with the protection of the identity of the individual in as far as is possible and in line with the legislation. The Protected Disclosures Act 2014 applies to all employees, contractors, agency staff, trainees, temporary employees and former employees.

Employees who make a disclosure under the Protected Disclosure Act will not be penalised for doing so. Employees who make or have made a disclosure will not be threatened, victimised or retaliated against in any way. Any employee found to be acting in an inappropriate manner as stated previously against an employee that has made a disclosure will be subject to disciplinary proceedings up to and including dismissal.



If it is found that an employee has made a vexatious or malicious disclosure than they may be subject to disciplinary action up to and including dismissal. The Protected Disclosures Act 2014 does not extend to a person who deliberately falsely reported a wrong doing or if that person's motivation for the reporting of the wrong doing is unlikely to meet the reasonable belief standard. They will not be protected under the Protected Disclosures Act 2014.

If you have information which leads you to reasonably believe that there has been a relevant wrong doing you should raise the matter in writing, or verbally if writing is not possible, with someone at a suitably senior level, i.e. to the Chief Executive of Galway Racecourse. This address goes directly to the organisations designated protected disclosures representative of the organisation and remains highly confidential.

The legislation specifically states that a disclosure must refer to one or more relevant wrongdoings and are listed as follows;

- Offences that are or are like to be committed
- Failing to comply with legal obligations
- Miscarriage of justice
- Health and safety risk, including risks to the public as well as other workers
- Damage to the environment
- The unauthorised use of public funds or resources
- Oppressive discriminatory or grossly negligent action or inaction by a public body
- Information showing any matter falling into categories above may be destroyed.

A protected disclosure about a relevant wrongdoing can be something that is happening now, has taken place in the past or is something that is about to happen.

The issues of concern in relation to our organisation are likely to include but are not exclusively:

- A criminal offence has been, is being, or is likely to be committed
- An action jeopardising the integrity of the organisation is occurring or is likely to occur
- A person has failed, or is likely to fail, to comply with a legal obligation
- The health or safety of any individual has been, is being, or is likely to be endangered
- The working environment has been, is being, or is likely to be damaged
- You have information tending to show any of the above has been, is being, or is likely to be deliberately concealed

The format for making a disclosure should, as so far as is reasonably possible include a description of the relevant wrong doing and provide as much information as possible to assist the investigator/s.

At all-times during an investigation the disclosure will be kept secure and in a format that does not endanger confidentiality of the person who made the disclosure. However, it may become necessary for the person to be revealed to assist the investigator/s. At all times the organisation will ensure that the person/s is not subjected to penalisation or victimisation because of the disclosure.

Responding to a Complaint

The person to whom the complaint has been raised to will endeavour where possible to keep the worker(s) informed of the progress of the investigation. They will ensure that the complaint is acknowledged, provide a summary of how the organisation intends to deal with the complaint or, in the instance that the concerns raised are not suitable to be investigated under this policy, provide the information on the relevant policy/ policies for the employee to pursue their concern.

Any disclosure is considered to be 'confidential information', and therefore should not be discussed with, or disclosed to, other employees or individuals who do not work for Galway Racecourse This does not infringe your rights to seek advice or representation throughout this process.



Section 4 - Compensation and Benefits

Payroll

Employees are paid either weekly or monthly in arrears by credit transfer, as detailed in your contract of employment.

Each employee will be issued with a pay slip that itemises:

- How earnings for the period were calculated
- Compulsory deductions such as P.R.S.I., P.A.Y.E., U.S.C. etc
- Voluntary deductions where applicable e.g. pension (PRSA), social club etc
- Cumulative earnings and deductions for the tax year to date

The company is diligent in its efforts to consistently ensure the accuracy of employee pay. Any overpayment or under-payment must be immediately brought to the attention of the Chief Executive. Failure to notify over-payments in a timely manner may result in disciplinary action.

Any overpayment of salary and/or of travel and subsistence may be deducted from future salary payments due to an employee in accordance with the Payment of Wages Act 1991 (or as amended). The Company will advise the employee in writing of the amount and details of any such overpayment and give the employee at least one week's notice of the deduction to take place and will deduct the overpayment at an amount that is fair and reasonable having regard to all the circumstances.

Changing & Updating Personal Details

You will be requested to provide the Company with your personal details (e.g. bank details, contact details, next of kin details etc.) upon the commencement of your employment, in order to facilitate the legal operation of your employment contract with the Company (e.g. for payroll purposes) and for the efficient and effective performance of the employment relationship.

It will be the employee's responsibility to inform anyone whom they nominate as their next of kin with the Company, to that person directly, in accordance with good data protection practices.

In the event that any of your personal, bank, contact details etc. change it will be your responsibility to inform the Company/ your line manager of this at the earliest possible opportunity. Failure to do so may result in, for example, correspondence being issued to an incorrect postal address, for which the Company cannot be held responsible.

Any change or updates to person details should be notified in writing to your line manager without delay.

Expenses

Any travel and out of pocket expenses wholly or necessarily incurred on company business, will be reimbursed to you to the extent that they are allowable under company policy/ Revenue guidelines. Further advice and guidance will be provided, when and where applicable (e.g. completion of expense forms, provision of receipts etc.). Further details are available from your line manager.

Pension Scheme

All employees have the option to join the pension scheme after 6 months service. Enrolment in the scheme is currently voluntary. You will be allowed access to the company nominated pensions advisor, to consult in relation to your pension requirements. Full details of the scheme, including an explanatory booklet and payroll deduction authorisation form is available on request from the Chief Executive.

The company will make the requested deductions from your salary and submit these to the pension advisor for investment. Each payslip will provide you with details of any pension deductions made.



Home/ Remote Working Policy

Prior to reviewing the details and company policy on home/ remote working as outlined below, employees should be aware of the following:

- No employee should ever assume a right to work remotely/ away from their normal base/ place of work
- Any suggestions or requests to work remotely must be applied for/ discussed/ approved in advance with your line manager (whether that be ref. routine, ad hoc days or a more regular 'remote/ working from home' arrangement)

In the context of this policy, home/ remote working refers to time spent working away from the organisation's premises (and client premises as the case may be for field-based staff). At present, it is not intended that home/ remote working will be a full-time arrangement but, where individually agreed, employees may work part of the working week or working day at home, or another location as agreed with their manager.

- The hours to be worked away from the workplace will be formally agreed to allow specific, measurable targets to be set and regular feedback on performance
- Communication arrangements will be agreed before any home/ remote working arrangement can be approved. This will cover how the employee will be contacted during agreed working hours while away from the business/ client premises, as well as the communication processes on the employee's return
- The resources required will be identified, such as computer, phone, internet connection, and the extent of the company's commitment in covering these costs will be agreed however, should you require any additional supports to assist you with home/ remote working, please discuss with the Chief Executive
- All security and confidentiality rules, policies and procedures, will continue to apply, and any breaches will be dealt with under the disciplinary procedure

It is the responsibility of the employee to consult their insurance company where appropriate to ensure that they meet any contractual requirements. Failure to inform domestic insurers may result in insurance cover being rendered invalid.

The normal policy regarding holidays and sick leave will apply, including the procedure relating to the reporting of sickness absence.

If you have any reason to believe that any confidential information is lost, altered or has been accessed by any unauthorised person, you must report this to your line manager without delay.

This part of the policy and the procedures within it apply to your use of our systems, to your use of our laptops, and also to your use of your own computer equipment or other computer equipment (e.g. client's equipment) whenever you are working on Company business away from our premises (working remotely).

When you are working remotely you must:

- 1) When travelling keep the computer with you at all times. This means declaring a laptop as hand luggage at airports.
- 2) If left on the Company premises, the computer should be powered off and stored in secure cabinet or locked offices when not in use.
- 3) Do not leave laptop computers unattended in relatively insecure locations, such as the back of a car.
- 4) Do not display sensitive information in a public place where the screen could be viewed by others, such as on trains or in airports.
- 5) Position yourself so that your work cannot be overlooked by any other person;
- 6) Diskettes/USB keys or other media holding sensitive information should not be held with the computer. Do not hold sensitive information on the hard disk unless it is encrypted to a standard agreed with the Chief Executive of the Company.



- 7) Password protect any work which relates to our business so that no other person can access your work;
- 8) Use a carrying case to reduce the risk of accidental damage.
- 9) Observe any procedures outlined when you were provided with the computer e.g. use of the power-on password.
- 10) If the computer is used for remote access, do not use log-in scripts which contain passwords or other information of use to potential hackers.
- 11) Ensure that backups are taken regularly.
- 12) Ensure that any work which you do remotely is saved on the Company system or is transferred to our system as soon as reasonably practicable.
- 13) Theft of a laptop, PDA, mobile phone or any company device must be reported immediately to the Company and An Garda Siochana. This needs to be done as soon as possible in order to minimise security risks such as unauthorised remote access to the network.
- 14) PDAs or similar hand-held devices are easily stolen and not very secure so you must password-protect access to any such devices used by you on which is stored any personal data of which the Company is a data controller or any information relating our business, our patrons or their business. The device must also be encrypted at all times.

Educational Assistance Policy

The purpose of this policy is to promote the continued development and further education of employees as a means to achieve the company's objectives and to meet individual career needs. Opportunities to update professional knowledge and to acquire technical and professional qualifications will be afforded where these are relevant to the job and the organisation. The educational assistance programme is available to employees who have successfully completed one year's service (unless by exception and as agreed by the Chief Executive).

Employees are encouraged to pursue self-development and to undertake private study, provided the courses are relevant to the individual's work or the activities of the organisation, and it does not interfere with the daily work of the individual.

Employees must apply in writing for support under the Educational Assistance Policy. The company will evaluate the request and will decide to fund, part-fund, as appropriate, depending on the relevance to the individual's job and the company. Financial assistance for tuition may be available, repeat years excluded. This decision is at the discretion of the company. You may be reimbursed for:

- Student registration fees and/or
- Lecture/course fees and/or
- Examination fees

On approval, the company may pay fees for a relevant course in advance of and/ or on successful completion of the course. The company may also decide on an appropriate repayment plan, which will be discussed and agreed with you.

Following completion of the course/ programme, it is anticipated that employees will remain with the company for an agreed period of time. Should an employee leave the company we will seek to recoup the cost against a repayment schedule. An education assistance agreement will be drawn up at the outset of the course outlining all of the relevant/ necessary details.

Employees who avail of benefit under the Educational Assistance policy may also be granted paid time off for study leave and/ or to sit exams, to be discussed and agreed with their line manager.



Section 5 - Leave of Absence

- Sick Leave and Absence Management
- Bereavement and Compassionate Leave
- Force Majeure Leave
- Jury Service
- Maternity Leave
- Adoptive Leave
- Paternity Leave
- Parental Leave
- Parent's Leave
- Carer's Leave
- Medical Appointments
- Extreme Weather Policy

Sick Leave and Absence Management

It is a condition of employment with Galway Racecourse that all employees satisfy their obligation under their contract of employment to attend work. Consistent regular attendance at work is required, and all employees will be held accountable for such.

Reporting of Absences

If employees are unable to report for work due to illness they should telephone their line manager no later than 8.30 am on the first day of their sickness and indicate the reason for and likely duration of their absence. In situations where the manager is not available they should speak to the Chief Executive of the Company.

Direct verbal contact must be made and text/ WhatsApp messages, emails and/ or messages passed on by a family member or work colleague will not be accepted.

If you anticipate that your absence will be for longer than one day, you are expected to inform your manager of your planned/ expected date of return.

In the case of an on-going illness in excess of one week, the employee must telephone his/her manager no later than 8.30 am on the first day of each week in which he/she is absent, advising that the absence is continuing and their likely return date.

Requirement for Medical Certification

Each employee must produce a medical certificate for periods of sick leave of 3 days or more, stating the nature of the illness, and subsequent certificates are required to be sent at weekly intervals thereafter. Medical certs should be submitted for the attention of the employee's line manager.

Payment

Contingent on the adherence to the reporting/ notification and certification requirements outlined above, employees will be paid full basic salary for up to 1 month absence and, after that, such remuneration, if any, as the Board and Chief Executive shall determine from time to time.

However, any sick pay remains at the discretion of the Company and may be withheld for objective reasons such as failure to follow the required reporting/ notification and/ or certification procedures, which are as outlined above but which may change in the future as the business may decide.

You may be entitled to state benefit during your absence as a result of sickness or injury, provided you meet the requisite criteria. It will be your responsibility to contact Social Welfare directly and to complete claim forms as relevant, however should you require the Company to complete any relevant information please contact your line manager. Any social welfare monies received whilst in receipt of company sick pay will need to be refunded to the Company, and the Company reserves the right to deduct same directly from your salary where appropriate/ relevant.

Return to Work

Employees have a responsibility to ensure their return to work at the earliest date possible commensurate with good health and safety. Before returning to work from a sick leave absence, an



employee may be required to provide a certificate of Fitness to Work from their medical practitioner, confirming that he or she can safely return to work.

On return to work after an absence, you must report directly to your manager at the start of that working day. Managers will meet with each employee on their return to further understand the nature of the absence, its implications and update the employee on their job priorities, as part of the return to work process. This may take the form of an informal discussion or a return to work meeting.

Company Appointed Physician

The Company reserves the right to have staff members examined by its own Medical Advisor or any registered medical practitioner at the Company's expense, at any stage of a period of illness.

Illness during Annual Leave

When a period of medically certified illness occurs during an employee's annual leave, this period will not be deemed to be part of his/her annual leave. The manager must be notified immediately and production of a medical certificate is required.

Failure to Follow Sick Leave Procedures

Where an individual fails to comply with the sick leave procedures or has an unsatisfactory absence record, he/she will be invited to a meeting with their manager. Where abuses of the sick leave policy have been committed, the Company reserves the right to initiate disciplinary proceedings, up to and including dismissal.

Absence Management

Each absence will be assessed on its individual merits. However, please note that where the organisation finds that an employee's attendance is affecting their capability to fulfil the duties of their position with the Company, it reserves the right to handle the matter through the Disciplinary Policy and Procedure.

Other Absences

There may also be occasions where you are unable to attend work, *although it may not be due to your own illness*:

- If you cannot attend work due to an unforeseen illness/ injury to an immediate family member – please refer to the Company's policy on Force Majeur leave (see below).
- If you cannot attend work due to adverse weather conditions – please refer to the Company's policy on Extreme Weather (see below).
- If you are unable to attend work for any other reason, you are required to comply with the notification requirements set out above. **Unauthorised absence** – i.e. no show and no contact – is not acceptable and may be subject to disciplinary action given the significant impact it can have on business, patrons etc.

Bereavement and Compassionate Leave

The company understands that the loss of loved ones needs to be managed in a sensitive and caring manner. In the event of time needed to be taken due to bereavement, then the company will grant time off with pay for compassionate / bereavement leave at its discretion. Approval of such leave rests with your manager. While each case will be treated separately, the following guidelines apply:

- in the case of a spouse/partner, parent, child, brother or sister, 8 days' bereavement leave will be given
- in the case of other close relatives, namely grandparent, mother-in-law, father-in-law, uncle, aunt, sister-in-law, brother-in-law, nephew, niece, grandchild, 3 day's bereavement leave will be given

The company reserves the right to treat each case on an individual basis and additional days may be provided on a discretionary basis.



Force Majeure Leave

The company *may* grant short-term paid leave to cover employees in times of an emergency due to unforeseen illness/ accident/ injury to an immediate family member and where the presence of the employee is essential.

This force majeure leave is available in the event of the illness or injury to a partner, husband, wife, a parent or grandparent, brother or sister or a person to whom the employee is parent, adoptive parent or is in loco parentis. This includes a person in a position of domestic dependency, including same-sex partners.

In the event that the employee is absent due to an illness or injury of a defined relative, he/she must contact his/her manager within 1 hour of their normal start time on the first day of absence, or as soon as reasonably practicable.

On returning to work the employee must immediately provide their manager with written details stating the date(s) of (force majeure) leave and an explanation of why force majeure leave is being applied for. In order to be entitled to a period of force majeure leave the situation (illness/ accident/ injury) must be urgent/ immediate/ unforeseen, and the employee's presence must be indispensable. The manager will consider the application, and may consult with the Chief Executive of the Company, and the employee will be notified in writing as to whether the period of force majeure leave is approved. Please note that advance notice of a situation will not constitute an entitlement to force majeure leave, for example, to attend a doctor's appointment.

Employees found abusing their entitlement to force majeure leave will be subject to the disciplinary procedure.

Jury Service

The company facilitates employees to fulfil their civic responsibilities by serving jury duty when required. Paid leave of absence is granted where an employee is called for jury service.

Employees must show the jury duty summons to their manager as soon as it is received, so that arrangements can be made to accommodate for the absence. They must also produce a Certificate of Attendance for each day/ part-day of absence from work. Certificates of Attendance can be procured from the Clerk of the Court covering the period of jury service. While serving, if excused for a part of the day, the employee must report for work. If the employee is released from jury service, he/she is expected to return to work immediately.

An employee may apply to the County Registrar to be excused from jury service and should provide reasonable evidence of the grounds for their exemption e.g. medical certificate, business purposes. In the event of exceptional business circumstances or immediate operational requirements (e.g. a request to attend court for jury selection during race week), the company may corroborate an employee's application to be excused, by way of the preparing of a letter for the employee to present at the Court.

The company must be notified of any payments towards loss of earnings received in respect of jury service from the State. These will be deducted from the employee's earnings.

Attendance at court as a witness – employees should notify their line manager as soon as any such notice is received to agree time off which will be required. Employees are not entitled to payment from Galway Racecourse for such leave and should claim their expenses through the courts system/ party whom summoned them as a witness.

Maternity Leave

Any female employee expecting a baby is entitled to a continuous period of maternity leave around the time of birth of the child. The employee is entitled to 26 weeks maternity leave. The employee will



maintain all of her employee rights, other than remuneration, during the 26-week period, including the entitlement to annual leave and public holidays.

Once the pregnancy is confirmed the employee is required to advise the company in writing as soon as possible but at least 4 weeks before the commencement of her maternity leave. This notice must be accompanied by a doctor's certificate stating the expected date of birth. Of the 26-week period, at least 2 weeks must be taken before the expected date of birth, and at least 4 weeks after the birth.

The employee may also choose to take additional maternity leave at the end of the 26-week period, if she so wishes. The employee is entitled to up to 16 weeks additional maternity leave. The employee should apply in writing for this leave at least 4 weeks before the approved maternity leave expires or, should she wish, before she goes on maternity leave. The employee will maintain all of her employee rights, other than remuneration, during the additional maternity leave, including the entitlement to annual leave and public holidays.

Employees must provide the company with at least 4 weeks' notice of their intention to return to work and planned date of return. When maternity leave ends, the employee will be entitled to return to her usual job so far as it is reasonably practical. However, if this is not possible the employee will be offered suitable alternative work.

During maternity leave, employees who have the necessary PRSI contributions are entitled to maternity benefit from the Department of Employment Affairs & Social Protection. It is recommended that you apply at least six weeks before the start date of your maternity leave. Claims should be made via mywelfare.ie or postal applications on an MB1 form, which is available from your hospital, doctor or social welfare office. The Company must complete the "Employer Certificate for Maternity Benefit" (MB2) and your doctor must complete the "Medical Certificate for Maternity Benefit" (MB3), (not earlier than 16 weeks before your baby is due).

During the 16-week period of additional maternity leave, no payment is made by the Department of Employment Affairs & Social Protection.

In the event of the death of the mother of the new born child during maternity leave, the father will be entitled to avail of leave. The duration of such leave depends on when the death of the mother occurred.

Premature Birth

An employee is entitled to additional maternity leave where their baby is born prematurely. The additional leave is from the period of time between your baby's actual birth date and the expected start date of your maternity leave and Maternity Benefit. Your 26 weeks maternity will commence on the date of birth, however, you can then take additional maternity leave at the end of the 26 week period for the premature birth.

For example; If you planned to start your maternity leave at week 37 of your pregnancy, 2 weeks before your expected due date. If your baby is born on week 34, 3 weeks before you were due to take maternity leave. You will be entitled to take your standard 26 weeks maternity leave plus the three additional weeks at the end of the 26 week period, your ordinary maternity leave will last for approximately 29 weeks.

In order to qualify for the additional maternity leave you will need to provide the company with a copy of a letter from the hospital confirming your baby's actual date of birth.

Employees are required to apply to the Department of Employment Affairs and Social Protection within the 26 weeks ordinary maternity leave, for extra Maternity Benefit due to the premature nature of your baby's birth.

Antenatal and Postnatal Care

An employee is entitled to paid leave for antenatal and postnatal care. An employee will receive paid time off for any antenatal medical appointments before the birth and postnatal medical appointments for the first 14 weeks following the birth. An employee must give the company two week's written notice of any appointment and must be able to produce a certificate/record that the visit took place. The company requests that, where possible, the appointments are at the beginning or at the end of the



working day. If the appointment finishes during the working day, the employee is expected to return to work.

An employee, who is pregnant, has recently given birth or who is breastfeeding, will not be placed in any job that is a risk to her health and safety or that of her child. If such a risk does exist then the company will remove the risk, re-assign the employee to other suitable employment or place the employee on health and safety leave, which will be paid by the company for the first 21 days. Thereafter, the employee will receive benefit from the Department of Employment Affairs and Social Protection.

Maternity leave entitlement does not apply in the case of a miscarriage before 24 weeks of pregnancy.

Antenatal Classes

An employee is entitled to paid leave for antenatal classes. This leave will be granted to expectant mothers and fathers, subject to the following;

- An expectant mother is entitled to paid time off to attend one set of ante-natal classes, except for the last three classes in a set. This is a once off entitlement.
- Note: This entitlement does not apply in respect of the last three ante-natal classes in a set, for which unpaid leave or annual leave may be provided if they occur during normal working hours.
- An expectant father is entitled to paid time off to attend the last two ante natal classes in a set of classes which the expectant mother is attending.

The employee must give the company two weeks' notice in writing, of the times and location of the classes. This written notification should be accompanied by an appointment card from the relevant body running the classes. These requirements may be waived in special circumstances where the failure to provide notification is not due to an employee's neglect. In such circumstances the employee must provide evidence of attendance at the ante-natal class, and also provide a detailed explanation as to why he/she failed to adhere to this notification procedure.

The organisation reserves the right to refuse payment for time-off to employees where there is an abuse of this procedure, and any such abuses will be dealt with under the disciplinary procedure.

Hospitalisation of the Child during Maternity Leave and/ or Additional Maternity Leave

If either of these circumstances were to arise, the employee should contact their line manager at the earliest opportunity. The line manager will advise them of any notification and certification requirements and of the protocol to be followed.

III-Health of the Mother during Maternity Leave and/ or Additional Maternity Leave

If either of these circumstances were to arise, the employee should contact their line manager at the earliest opportunity. The line manager will advise them of any notification and certification requirements and of the protocol to be followed.

Breastfeeding Arrangements

An employee who is breastfeeding will be entitled to work breaks or a reduction in working hours equivalent to one (1) hour per day for the purposes of breastfeeding. Where suitable facilities are available in the workplace, this benefit will be through rest breaks, otherwise the employee can avail of a reduction in working hours. For the purposes of the 2004 Act "breastfeeding" means breastfeeding a child or expressing breast milk and feeding it to a child immediately or storing it for the purposes of feeding it to a child at a later time.

This entitlement may be availed of for up to 26 weeks after the date of birth of the child. Breastfeeding breaks or a reduction of hours will comprise of one 60-minute period, two 30-minute periods, or three 20-minute periods as agreed with your line manager. Part time employees will be entitled to a pro-rata benefit to that provided to full-time employees.

To avail of this benefit, the employee must inform their manager of the intention to avail of this work break / reduction in hours when advising the company that she will be returning to work, i.e. not later than four weeks before the intended return to work date. The employee should include a copy of the child's birth certificate with such an application. The employee will remain on full pay during the period of breaks or when hours are reduced for breastfeeding purposes.



Adoptive Leave

The company will provide time off to employees who have adopted a child. Adopting mothers, sole male adopters and the relevant parent of a same-sex couple are entitled to 24 weeks adoptive leave from the date of placement and up to an additional 16 weeks adoptive leave at the end of this 24-week period. The arrangements and notification periods for adoptive leave are the same as for maternity leave (see above).

An adopting mother, sole male adopter or the relevant parent of a same-sex couple must notify the company, in writing, of his/her intention to take adoptive leave no later than 4 weeks before the expected date of placement. The company will require a certificate of placement, or a declaration of eligibility and suitability, as soon as is reasonably practicable. In foreign adoption cases, some of the additional adoptive leave may be taken before the placement of the child. In such cases, the employee must notify the company in writing 4 weeks before the leave is due to begin.

An employee will maintain all of his/her employment rights, other than remuneration, during the 24-week adoptive leave period and during the additional adoptive leave of up to 16 weeks, including the entitlement to annual leave and public holidays. An employee who is on adoptive leave is normally entitled to payment from the Department of Employment Affairs & Social Protection, depending on meeting certain eligibility criteria, using an AB1 Adoptive Benefit application form, available from Social Welfare.

During the 16-week period of additional adoptive leave, no payment is made by the Department of Employment Affairs & Social Protection.

Before adoptive leave ends, the employee must provide 4 weeks' notice of the intended date of return to work and will be entitled to return to his/her usual job so far as reasonably practicable. However, if this is not possible, the employee will be offered suitable alternative work.

If the placement of an adopted child is terminated after a period of less than 24 weeks, the employee must notify their manager within 7 days. A date of return to work will be notified to the employee, not later than the date of return after the period of adoptive leave or additional leave.

Pre-adoption classes and meetings

An employee is entitled to paid leave for pre-adoption classes or meetings which the employee is obliged to attend. This leave will be granted subject to the employee giving the company two weeks' notice in writing, of the times and location of the classes and/or meetings. This written notification should be accompanied by an appointment card from the relevant body running the classes. These requirements may be waived in special circumstances where the failure to provide notification is not due to an employee's neglect.

Hospitalisation of the Child during Adoptive Leave and/ or Additional Adoptive Leave

If either of these circumstances were to arise, the employee should contact their line manager at the earliest opportunity. The line manager will advise them of any notification and certification requirements and of the protocol to be followed.

III-Health of the Mother/ ole Male Adaptor during Adoptive Leave and/ or Additional Adoptive Leave

If either of these circumstances were to arise, the employee should contact their line manager at the earliest opportunity. The line manager will advise them of any notification and certification requirements and of the protocol to be followed.

Paternity Leave

The Paternity Leave and Benefit Act 2016 provides 'relevant parents' to 2 weeks paternity leave from 1st September 2016 to provide care or support to a child.

Paternity leave must be taken within the first 26 weeks after the baby is born.



A "relevant parent" includes:

- The father of the child
- The spouse/ civil partner/ cohabitant of the child's mother
- The parent of a donor-conceived child
- Same sex couples jointly adopting a child must choose one parent to be the "relevant parent"
- The partner of an adopting mother
- A sole male adopter

An employee considered to be a "relevant parent" of a child will be entitled to two weeks' consecutive leave from their employment to care for their child.

Only one person who is a relevant parent in relation to a child shall be entitled to paternity leave in respect of that child. In the unfortunate case of a stillbirth or miscarriage following the 24th week of pregnancy, the entitlement to paternity leave and benefit remains available, within 26 weeks from that time, the benefit is given where the employee satisfies the PRSI requirements.

In the case of multiple birth's/adoptions the entitlement is still one period of Paternity Leave (i.e. 2 weeks). For employees on a fixed term contract the last day of his or her Paternity Leave shall be the day on which the term of his/her contract expires, or the last day of the leave period, whichever is the earlier.

Paternity Benefit

Employees are required to apply for a Public Services card in order to obtain the paternity benefit. Employees can register for this card on mywelfare.ie.

Paternity benefit is payable by the Department of Employment Affairs & Social Protection. Eligibility for payment will be based on the same PRSI contribution requirements, similar to maternity benefit. The benefit must be claimed within 26 weeks of the date of birth, or date of placement if the child is adopted, and is paid for two consecutive weeks using an Employer Certificate for Paternity Benefit, form PB2, available from Social Welfare.

Notification

Notification of the intention to take Paternity Leave must be given as soon as reasonably practicable but no later than 4 weeks before the expected date of birth of the child or 4 weeks before the expected date of placement of an adopted child. A medical certificate setting out the expected date of birth or confirming the birth must be provided or, in the case of an adoption, proof of the date of placement.

Commencement of Paternity Leave (premature birth)

If the baby is premature and is born 4 weeks or more before the expected date of birth, then the relevant parent can avail of the leave early as long as notification to the organisation is given within 7 days of the date of birth.

Postponement of Paternity Leave

Where the day of placement is postponed or the date of birth occurs after the date selected in the notification, the relevant parent shall be entitled to select another date on which the paternity leave shall commence.



Hospitalisation of the Child during Paternity Leave

If this situation were to arise, the employee should contact their line manager at the earliest opportunity. The line manager will advise them of any notification and certification requirements and of the protocol to be followed.

Ill-Health of the “relevant parent” during Paternity Leave

If this situation were to arise, the employee should contact their line manager at the earliest opportunity. The line manager will advise them of any notification and certification requirements and of the protocol to be followed.

Transfer of Leave

In the regrettable circumstance where a relevant parent dies before the expiry of the twenty-sixth week following the date of confinement or day of placement, the surviving parent of the child shall be entitled to the leave (“transferred paternity leave”), subject to certain notification requirements.

Abuse of Paternity Leave

Where the company has reasonable grounds for believing that an employee who is on paternity leave is not using the leave for the purpose specified the leave will be terminated and any period between the commencement date of the leave and the end date of the leave specified in the notification shall be deemed not to be Paternity Leave. Where the employee is found to have abused Paternity Leave, they will be subject to disciplinary action up to and including dismissal.

Parental Leave

The company will provide parental leave to facilitate parents who require periods of short-term unpaid leave to take care of a child under 12 years of age, or older in specific circumstances.

Any employee, who is a natural or adoptive parent, or in *loco parentis*, and has completed one year's continuous service, is entitled to 26 weeks unpaid leave per child, to enable him/her to take care of his/her child. All parents of children under 12 years of age are eligible, as are parents of a disabled child, or a child with a long-term illness under 16 years. In the case of an adoption, the age by which the leave should be taken may be extended.

The 26-week entitlement may be taken continuously or broken down into periods of a minimum of 6 weeks, with a minimum period of 10 weeks between each block. Parental leave requests which are broken down into days or weeks are entirely at the discretion of the Company, and each application will be dealt with on an individual, case by case basis, depending on the business needs, the employee's role etc. Part-time employees have a pro-rata entitlement, based on the number of hours worked.

Where an employee has less than 1 years' service and more than 3 months continuous service, and the child is about to go beyond the specified age limit, the parental leave entitlement is one week's unpaid leave for each month of continuous employment. Any period of probation, training or apprenticeship will be suspended while an employee is on parental leave and will be completed on the employee's return.

All employment rights will be protected while on parental leave other than the right to remuneration. Annual leave and public holiday entitlements accrue while an employee is on parental leave. Should an employee fall ill while on parental leave and be unable to care for their child, they need to contact their manager. For all periods of medically certified sick leave, the employee may transfer to the company sick-pay scheme and resume their parental leave when fit to take care of their child. Normal sick leave notification and certification procedures apply.

Applying for Parental Leave

An employee must inform the company in writing of their intention to take parental leave, not less than six weeks prior to the planned commencement of the leave and attach a copy of the child's birth certificate. A Confirmation Document of Parental Leave will be issued for signing not less than 4 weeks before commencement of the parental leave. An employee may revoke their notice to parental leave prior to signing the Confirmation Document. A signed copy will be given to the employee and put on



his/her file. Any alteration or changes to parental leave (once a confirmation document/ agreement is signed) can only be made by mutual agreement.

The company will consider applications for, but cannot guarantee agreement to, the transfer of parental leave entitlements from one parent to another should both be employed in the Company.

Postponement

The company has the right to postpone the granting of parental leave for up to six months, if granting it at a certain time would have an adverse impact on the business. In such cases, the company will consult with the employee so that a mutual alternative can be reached within 6 months, and should the child reach the age limit, this will not prevent the parent taking the leave at the future date.

Return to Work

At the end of the period of parental leave, the employee is entitled to return to their normal job under the same terms and conditions. If this is not feasible, suitable alternative employment will be provided.

Right to Request Changes when Returning from Parental Leave

The company will consider applications for employees who request a change in their working hours following their return from a period of Parental Leave, for a set period of time.

The request must be received in writing not later than 6 weeks before the date on which the change is to commence. It must specify the nature of the change and the proposed start and end date of the change. The company will respond to such a request not later than 4 weeks after the application is received. The request will be carefully considered against the needs of the applicant and the business needs of the organisation.

If the request is granted an agreement will be signed setting out the detail of the leave. Prior to signing this agreement, the employee may retract the request in writing.

Abuse of Parental Leave

If, at any stage, the company suspects that parental leave is not being taken for the reason stated, written notification will be sent to the employee outlining the company's concerns and requesting a reply within 7 days. The company retains the right to terminate the parental leave if the employee is found to be in breach of the policy and the disciplinary procedure will apply.

Parent's Leave

The Parent's Leave and Benefit Act 2019 enables a "relevant parent" to take 5 weeks parent's leave which must be taken within 2 years of the birth or placement of the birth/adoption of a child.

Subject to eligibility and notification criteria being met, parent's leave will apply to births/placements that take place on or after the 1 November 2019. During parent's leave, employees who have the necessary PRSI contributions are entitled to parent's leave benefit from the Department of Employment Affairs and Social Protection.

Parent's leave is available to eligible members of staff to allow them time off from work within the first 2 years of the birth or adoption of their child or the child of their spouse or partner.

Parent's leave is available to employees who are deemed to be the "relevant parent" of a child. There is no minimum service required with the company to qualify for parent's leave. Parent's leave is non-transferrable between relevant parents.

Under the Act, a "relevant parent" includes:

- a parent of the child
- the spouse, civil partner or cohabitant of a parent of the child
- a parent of the child where the child is a donor-conceived child
- the adopting mother or sole male adopter of the child
- the spouse, civil partner or cohabitant of the adopting mother or sole male adopter of the child
- each individual in the couple where the child is, or is to be, adopted jointly by a married couple of the same sex or a couple that are civil partners of each other, or a cohabiting couple of the same sex



In certain circumstances, this may give rise to an entitlement to parent's leave on the part of up to four individuals in respect of a single child.

The following conditions apply to taking parent's leave.

- Subject to eligibility and notification criteria being met, parent's leave will apply to births/placements that take place on or after the 1 November 2019.
- An employee who is a relevant parent may avail of parent's leave in periods of not less than one week at a time (i.e., the leave can be taken as one continuous block of 5 weeks, or as 5 separate weeks).
- The leave will commence on the date the relevant parent selects in his/her written notification.
- In the case of multiple births, or where two or more children are being adopted at the same time, only a single 5-week entitlement of parent's leave applies.

Notice required when applying for parent's leave

The company must be notified in writing by the employee at least 6 weeks before the employee intends to take the leave. Where Galway Racecourse is not the same employer from whose employment maternity or adoptive leave has been taken, the employee will be required to include a copy of the medical, or other appropriate certificate confirming the pregnancy and specifying the expected week of confinement / birth or date of placement of the child.

Applying for parent's benefit

An employee can apply for Parent's Benefit online at www.mywelfare.ie. An employee will need their child's PPS number to complete the application.

Postponement of parent's leave

In certain limited circumstances the company may need to exercise its right to postpone for up to 12 weeks their employee's intended parent's leave commencement date. Postponement may arise where the company is satisfied that the taking of the parent's leave at the time specified in the notification would have a substantial adverse effect on the operation of its business, profession or occupation by reason of

- (a) seasonal variations in the volume of work concerned,
- (b) the unavailability of a person to carry out your duties during the period of the leave,
- (c) the nature of your duties
- (d) the number of other colleagues availing of parent's leave during the period

If this postponement results in the child reaching 2 years before the leave has been drawn down, the 104-week/ 2-year cap will be extended by a reasonable time frame/ time frame set out in the legislation.

Early confinement

Where the birth of the child occurs 4 or more weeks prematurely, an employee who is the relevant parent (where circumstances require) will be deemed to have complied with their notice of intention to take parent's leave obligations to the company if notice is given in the period of 7 days commencing on the date of confinement.

Postponement of parent's leave due to late birth/postponed adoption placement

An employee who is a relevant parent may postpone a period of parent's leave where the date of birth occurs after the date selected by a relevant parent in their notification to the company or where the date of placement is postponed in the case of adoption. The relevant parent may select another date on which parent's leave will commence.

Postponement of parent's leave when the child is hospitalised

If the child is hospitalised, the employee may request in writing to postpone all or part of their parent's leave. The postponed leave is to be taken not later than 7 days after the discharge of the child from hospital or such other date as may be agreed between the relevant parent and the company.



Carer's Leave

Carer's leave allows employees to take temporary unpaid leave from employment for the purpose of providing full-time care and attention to a 'relevant person' requiring it. Employees with 1 year's continuous service may be entitled to leave from employment to care for a relevant person for a period of up to 104 weeks. Under this policy, the company retains the right to refuse requests for periods of less than 13 weeks and, in such circumstances, will provide the employee with an explanation.

The company will require receipt of a written decision from a Deciding Officer of the Department of Employment Affairs and Social Protection before approving a period of carer's leave. This written decision must deem the person for whom the employee has applied for carer's leave, to be a relevant person in need of full-time care and attention.

The employee must provide the company with a minimum of 6 weeks' notice when requesting a period of carer's leave (this may be waived in exceptional/emergency circumstances). The company will prepare a confirmation document, which must be signed by the employee, ideally 2 weeks before the commencement date.

All employment rights are protected while an employee is on carer's leave, except the right to remuneration. An employee maintains the right to their annual leave and public holiday' entitlements for the first 13 weeks from the date of commencement of carer's leave.

Carer's benefit can be applied for using the Carer's Benefit form CARB 1, available from social welfare.

Return to Work

Employees should inform the company four weeks before the end of the carer's leave that they intend to return to employment on the due back date. The company will facilitate employees return to work and a return to their normal job as far as is reasonably practical.

2nd Care Recipient

If carer's leave is approved for a 2nd care recipient during a current period of carers' leave, an employee can potentially take up to 208 weeks carer's leave. The employee is requested to inform and update their line manager asap if this arises.

Medical Appointments

The company reserves the right to request that an employee attend the company's Medical Advisor or any registered medical practitioner in order to receive an independent medical opinion in relation to the reasons/ circumstances surrounding an employee's absence/ ill-health.

With regard to personal appointments, wherever possible routine doctor, hospital, dentist, optician or other necessary medical appointments should be arranged outside working hours. If this is not possible you should book time off using your annual leave entitlement, in accordance with the Company annual leave notification and approval procedures.

Extreme Weather Policy *(also applies to pandemic)*

Introduction

As we have seen in recent years there has been an increase in weather warnings and alerts, notably red weather warnings and alerts such as Storm Ophelia in late 2017 and the 'Beast from the East' in early 2018.

The purpose of this policy is to advise and outline to staff the approach of the Company to dealing with such issues, in as fair and as reasonable a manner as possible.

Company Policy



The Company wishes to act as fairly and as reasonably as possible with regard to dealing with such issues, if and when they arise.

It is not always possible to provide advance notice and arrange advice planning for these types of issues as, on many occasions, weather alerts can change and develop at a very quick pace. However, broadly speaking, the following will be the Company policy:

The Company will monitor all weather alerts and updates including, but not limited to, communications from Met Eireann and the National Emergency Coordination Committee.

In the event of an orange weather alert and in the event that road users are warned not to take any unnecessary journeys, the business will intend to operate as normal. However, if any staff member is concerned for their own safety, health and welfare and does not feel comfortable travelling to work, they should contact the Chief Executive at the earliest possible opportunity to discuss and agree time off work/ working from home. If unable to work from home, any agreement will be for unpaid leave; alternatively, accrued annual leave may be taken by approval/ agreement with the Chief Executive.

In the event of a red weather alert whereby road users are advised not to travel, schools are advised to close etc., and businesses are advised to make decisions in relation to opening:

- The Chief Executive will make a decision at the earliest possible opportunity (e.g. whether the business will operate as normal or close).
- The Chief Executive will contact staff and advise them accordingly.
- In the event the business does not open, and work cannot be provided to staff:
 - This will be considered to be an unforeseen emergency event.
 - The Company will either approve home/ remote working or will provide unpaid leave to staff; alternatively, accrued annual leave may be taken by approval/ agreement with the Chief Executive.
 - The Company may, at its discretion, pay a portion of any period during which the business cannot operate as normal during such red weather events. Any payment on one occasion will not set any precedent for future events/ instances.

In the event of a weather alert arising which results in the closure of schools/ creches and, as a result, staff are unable to arrange alternative childcare at short notice and are unable to attend work:

- This will not qualify for payment/ paid leave under Force Majeure leave (as provided for under the Parental Leave Act)
- The employee should contact the Chief Executive at the earliest possible opportunity to discuss and agree time off work/ working from home. If unable to work from home, any agreement will be for unpaid leave; alternatively, accrued annual leave may be taken by approval/ agreement with the Chief Executive.

Other

The Chief Executive may reasonably request the assistance of some staff members to assist in the contacting of patrons to notify them of any business changes when an extreme weather events arises, e.g. changes to race events, corporate hospitality etc.

This policy shall act as a guide during extreme weather events however the Company reserves the right to update, vary or amend this policy as it sees fit which may be in line with legislation, best practice, business needs/ changes or otherwise. Please note that there is currently no employment related legislation in relation to the matter of extreme weather events.

Any queries should be directed to/ discussed with the Chief Executive.



Section 6 - Dignity and Respect

Equal Opportunities Policy

The company is committed to policies and practices that provide equality of opportunity for all, protect the dignity of employees and promote respect for others at work. All employees are required to take personal and individual responsibility to comply with these policies and to behave in a non-discriminatory way.

The company is committed to a policy of equal opportunities in employment. Training and promotion are open to all employees of the company. All employment decisions are based on the skills, knowledge, experience and qualifications required to perform a job to appropriate standards, and the employee's suitability for the role.

The company will not tolerate discrimination or any other inappropriate behaviour by one employee or group of employees against another or others for any reason. Discrimination is defined as the treatment of a person in a less favourable manner than another person is, has or would have been treated, on any of the nine grounds listed below. Discrimination can also be taken to have occurred where a person is treated less favourably by virtue of their association with a person who is a member of one of these nine groups. Discrimination also occurs where one of the grounds is imputed to a person and the person is treated less favourably as a result. Employment practices, treatment of an employee or decisions regarding an employee will not be influenced or affected by an employee's:

- Civil status
- Family status
- Sexual orientation
- Religion/ religious belief(s) (or lack thereof)
- Gender
- Age (16+)
- Disability
- Race, colour, nationality or ethnic or national origin; or
- Membership of the Traveller Community

The company is committed to promoting a positive and harmonious working environment where every employee is treated with respect and dignity, and in which no employee feels threatened or intimidated.

If an employee has any questions or concerns about any type of discrimination in the workplace, he/she should bring these issues to the attention of their immediate line manager, or any other manager, for resolution. Employees can raise concerns and make reports without fear of reprisal.

Employees should refer to the company's Grievance Procedure if they believe they have been treated unfairly in the course of their employment. If an employee feels that he/she has been bullied or harassed, they should refer to the company's Dignity at Work Policy, and the Complaints Procedure set out therein (see below for details).

Any employee contravening this policy and unlawfully discriminating against another employee, or potential employee, will render himself or herself liable for disciplinary action, up to and including dismissal.



Dignity at Work

Dignity at Work Policy

We are committed to protecting the dignity and respect of all those who work within the company. In particular, we are committed to ensuring that our company is free from any form of bullying or harassment at work and that our work environment is conducive to providing a high-quality service in an atmosphere of respect, safety and equality.

Galway Racecourse is committed to a positive work environment where work is done in an atmosphere of respect, collaboration, openness and equality. Bullying and harassment in the workplace are phenomena which Galway Racecourse will seek to prevent and will not tolerate. All employees have the right to be treated with dignity and respect. Management is committed to intervening in an appropriate manner - utilising one of the accepted procedures - to investigate and deal with allegations of bullying or harassment.

Galway Racecourse is committed to making this a good place to work. A good place to work has a positive work environment characterised by:

- A supportive atmosphere
- Good and open communication (e.g. through opportunities at regular staff meetings)
- Appropriate interpersonal behaviour
- Collaboration
- Open discussion and resolution of conflict
- Recognition, feedback and affirmation as appropriate
- Fair treatment of all staff (including fair systems of selection and promotion in line with agreed procedures)

Every person has a responsibility to play his/her part in contributing to a positive work environment. In this regard, a person who is a witness or bystander has a clear responsibility to raise concerns about dignity at work and threats to this, in an appropriate and timely manner.

No bullying or harassment within the company or in connection with the work of the company (i.e. during the course of employment) will be tolerated. Complaints of bullying or harassment may be dealt with either in a formal or an informal way, or by alternative means, as described below.

Complaints by employees or other persons in the workplace, of bullying or harassment at work, will be treated with fairness, sensitivity, respect and (as far as possible) confidentiality for all parties concerned. Any person accused of bullying and/or harassment will be afforded natural justice and treated with fairness and sensitivity.

Both the company's management and its employees have responsibility for creating and contributing to the maintenance of a work environment free from bullying and/or harassment. There is a responsibility on management to ensure the prevention of incidents of bullying and/or harassment, and to take action should any incidents be brought to their attention. Employees also have an obligation to cooperate with the investigation of complaints of bullying and/or harassment in the company. Employees who make or participate in the investigation of a complaint will not be subject to victimisation of any kind for doing so.

The policy applies to all employees whether permanent or fixed-term, full-time or part-time, and irrespective of length of service. The policy also applies to non-employees also such as agency workers, contractors, clients/ patrons, suppliers and other service providers.

This policy extends to behaviours which occur outside the company's premises, such as at social functions or training events, provided there is a nexus with the work of the company and its employees. Nothing in this policy limits the right of the company to investigate any matter which may relate to bullying and/or harassment in circumstances other than where a complaint has been made. All employees continue to have an obligation to cooperate with any such investigation.



Harassment, Sexual Harassment and Bullying

Harassment

Harassment is any form of unwanted conduct, related to any of the following grounds:

- Civil status
- Family status
- Sexual orientation
- Religion/ religious belief(s) (or lack thereof)
- Gender
- Age (16+)
- Disability
- Race, colour, nationality or ethnic or national origin; or
- Membership of the Traveller Community

, which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

For the purpose of the above definition, conduct includes acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material. To constitute harassment, the behaviour can be a once-off event or persistent and repeated behaviour. The following are some specific examples of the forms such conduct might take:

- Verbal harassment - spoken words, shouting, ridicule, unfair or excessive criticism, jokes, comments or songs
- Physical harassment – pushing, shoving or any form of assault
- Written harassment – including production of faxes, text messages, emails or notices, including social media notices and cyber harassment
- Intimidatory harassment – gestures, posturing or threatening poses
- Visual displays such as posters, emblems or badges
- Isolation or exclusion from social activities
- Excessive monitoring of work
- Unreasonably changing a person's job content or targets
- Pressure to behave in a manner that the employee thinks is inappropriate, for example being required to dress in a manner unsuited to a person's ethnic or religious background where there is no objective need to do so.

These examples are not exhaustive, and offences of a similar nature are also prohibited and will be dealt with appropriately.

Sexual Harassment

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

It is up to the employee to decide what behaviour is unwelcome irrespective of the attitude or intentions of others to the matter.

For the purposes of the above definition, conduct includes acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material. Sexual harassment may occur between men and women or between persons of the same gender. A single incident may constitute sexual harassment. The following are some specific examples of the forms such conduct might take:

- Non-verbal conduct of a sexual nature - looks, gestures, whistling, suggestive symbols, pictures, written materials, faxes, emails or text messages, and including social media posts and cyber sexual harassment



- Verbal conduct of a sexual nature - advances, propositions, suggestions, jokes, comments or innuendo and continued suggestions for social activity outside the work place.
- Physical conduct of a sexual nature - groping, kissing, fondling, patting, pinching, unnecessary touching, assault or rape
- Gender based conduct - conduct that denigrates, ridicules or is intimidatory or physically abusive of an employee because of his or her sex/ gender, such as derogatory or degrading abuse or insults which are gender-related

These examples are not exhaustive, and offences of a similar nature are also prohibited and will be dealt with appropriately.

An employee is protected from different treatment because he/she has rejected or accepted the sexual harassment or harassment

Bullying

The organisation's designated contact person to discuss and assist in the resolution of concerns relating to bullying is the Chief Executive. Please discuss any concerns, in confidence, with the Chief Executive.

Any form of bullying is prohibited by the company. Bullying is defined as repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual's right to dignity at work.

An isolated incident of the behaviour described in this definition may be an affront to dignity at work, but, as it is not repeated, it is not considered to be bullying.

The following is a non-exhaustive list of examples of types of bullying and offences of a similar nature are also prohibited and will be dealt with accordingly.

- Being treated less favourably than colleagues
- Verbal abuse, insults
- Humiliation
- Intimidation, aggression or threatening behaviour
- Isolation or exclusion with negative consequences
- Intrusion by pestering, spying and stalking
- Repeatedly manipulating a person's job content and/or targets
- Withholding work-related information
- Unfair and excessive criticism
- Undermining behaviour
- Excessive monitoring of work
- Bullying also includes cyber-bullying which are acts carried out by electronic means, e.g., online bullying, bullying via social media

Bullying must amount to seriously negative, targeted behaviours that are clearly wrong, undermining and humiliating, and the behaviour must undermine the complainant's esteem and standing in a harmful, sustained way.

Intention of Perpetrator

The intention of the perpetrator of bullying or harassment is irrelevant. The fact that the perpetrator has no intention of bullying or harassing the victim may not be a defence. The reasonableness or otherwise of the alleged behaviours will be considered when addressing/ investigating allegations of bullying or harassment.

What does not constitute bullying/ harassment?

- The reasonable and essential discipline arising from the good management of the performance of an employee at work does not amount to bullying or harassment, such as offering constructive feedback, guidance, or advice about work-related behaviour.
- Strongly expressing differences of opinion does not amount to bullying or harassment.



- Similarly, an action taken which can be justified as regards the safety, health and welfare of employees does not amount to bullying or harassment.

Employee Expectations

Employees of Galway Racecourse have an obligation to create a co-operative, relational climate and to relate in clear, civil and respectful ways to everybody in the workplace.

Employees also have a duty (under the Safety, Health & Welfare at Work Act, 2005) to:

1. comply with relevant statutory provisions and take reasonable care to protect their own safety, health and welfare and that of any other person who might be affected by their acts or omissions at work;
2. co-operate with the company to enable the company to comply with its statutory obligations; and
3. not engage in any improper conduct that is likely to endanger their own safety, health and welfare at work or that of anyone else

Complaints Procedure

All employees have a right to make a complaint if they feel they have been bullied and/or harassed, and they should follow the steps in the following procedure. All complaints will be taken seriously, and the procedure will be handled with fairness, sensitivity and with due respect for the rights of both the complainant and the alleged perpetrator. There is a three-tiered approach in the procedure – informal, informal supported (through mediation) and formal – to address the issue of bullying or harassment/sexual harassment in the workplace.

During any investigation into a complaint, the principles of natural justice must be adhered to. External assistance may be necessary to deal with complaints in some circumstances so as to ensure impartiality, objectivity and fairness in an investigation.

The approach to addressing complaints/ concerns will be informal where relevant/ appropriate. The prompt and informal problem-solving approach can offer the best method for addressing allegations of bullying/ harassment effectively, especially where the individuals involved will continue to work together. However, the Company fully recognises that the informal procedure (as outlined below) may not always be feasible/ appropriate.

The Informal Procedure

Method of making an Informal Complaint

Any employee who believes that he or she is being bullied or harassed should, where possible, indicate directly to the person complained of that the behaviour in question is unacceptable.

If the employee believes that this approach is not suitable or has been unsuccessful, the employee may then make an informal complaint.

Informal complaints should be addressed to the employee's line manager. If the employee's line manager is involved in the incident, the complaint should be submitted to the Chief Executive of the company.

An informal complaint may be verbal or written but is most likely to be made verbally.

The company will designate a person to handle the complaint. If the complaint was verbal, a written note of what is complained of will be taken by the designated person and a copy given to the complainant.

Procedure which will be followed

The designated person will establish the facts, the context of the complaint and the next course of action in dealing with the matter under the informal procedure. The designated person will also discuss other possible courses of action available to the complainant including mediation.

- Where specific examples are given



If the complaint concerns bullying and/or harassment and includes specific examples of the behaviour complained of, the person complained against will be presented with the complaint and will be given a chance to respond.

After the response is received (or a reasonable period of time has elapsed without a response having been received), a method will be agreed to progress the issue to resolution so that both parties can return to a harmonious working environment without bullying or harassment being a factor.

If the behaviour complained of does not concern bullying or harassment as defined, an alternative approach will be put in place and a rationale recorded.

- Where no specific examples are given
If no specific examples are provided, there is no complaint to be answered under this policy, though other means of protecting and repairing workplace relationships may be considered by the designated person.

The designated person will keep a record of all stages of the process, the complaint, the first meeting, action agreed and signed records of the final meeting. The purpose of the records, which will not include detail of discussions, is to provide evidence that the complaint was dealt with in an appropriate manner.

All parties will maintain, insofar as possible, the confidentiality of the informal process. Breaches of confidentiality will be treated as a serious disciplinary matter.

Resolution

When resolution is found through the informal procedure, both parties will be given support or periodical reviews, as appropriate. These may include counselling/ coaching or other appropriate interventions.

Where a complaint is found not to have been made in good faith, the complainant may be the subject of disciplinary action.

Resolving the Problem by Mediation

Mediation is an alternative method of resolving issues relating to bullying and harassment. Mediation involves the parties seeking to arrive at a solution through mutual agreement, rather than through an investigation and decision.

Mediation provides a confidential opportunity for the person who feels that he/she has been bullied or harassed, and the person accused of carrying out this inappropriate behaviour, to discuss the matter and to reach an agreement on their continuing working relationship.

Mediation is conducted in private, and is directly between the parties concerned, with the support of a mediator, who will act as an independent facilitator. Either party may withdraw from the process at any time by notifying the mediator, in writing, that they wish to do so.

If both parties agree to resolve the issue by mediation, the company will arrange the mediation process. An appropriate person, acceptable to both parties, from within or outside the company will be assigned as mediator.

If the mediation process results in an agreement acceptable to both parties, the mediator will draw up a written record of the terms of the settlement for signature by both parties.

If the matter is resolved by mediation, no disciplinary action will be taken.

If mediation breaks down or fails to achieve its goal, the only other option is to have the matter resolved by investigation. A person involved in the mediation process will not be involved in the investigation process. Resolving the matter by investigation may also be considered if the employee concerned feels that it is inappropriate to resolve the matter by mediation.

The Formal Procedure

Bullying



In accordance with the relevant Code of Practice concerning Bullying, the company may consider the information which has been presented by the employee, at the informal stages of the process, to determine whether or not a formal investigation is warranted/ necessary. This will be based on a number of factors including, but not limited to, whether or not they consider that the examples given by the employee constitute bullying behaviour. The company may refer the employee (back) to the mediation process or to other informal resolution options.

Harassment

In cases where an employee believes that an informal resolution is not a suitable means of addressing his or her concern, or where the employee believes that their previous recourse to the informal complaints procedure has been unsatisfactory, the employee may make a formal complaint of harassment. Choosing to bypass the informal process will not reflect negatively on the employee concerned.

Method of making a Formal Complaint

Formal complaints should be made in writing, signed and dated. The complaint should be confined to precise details of alleged incidents of bullying and/or harassment, including the dates of such incidents and the names of any witnesses.

Formal complaints should be addressed to the employee's line manager. If the employee's Line Manager is involved in the incident, the complaint should be submitted to the Chief Executive of the company.

On receipt of a formal complaint, an investigatory manager will be designated. The company may engage an external independent investigator if it is deemed appropriate in the circumstances. In exceptional circumstances, if either party has an objection to the investigatory manager, the company may designate an alternative manager. An objection to the designated investigatory manager must be made in writing to the company in a timely fashion and must clearly outline the grounds of the objection.

Complaints in Writing

Where a formal complaint is made but the complainant declines to submit a written statement, then a written record will be made of the complaint by the investigatory manager. The complainant will be asked to sign this record.

In the event that the complainant refuses to sign this record, the complainant will be made aware that the ability of the company to investigate the complaint on a formal basis may be compromised by any failure of the complainant to cooperate with the company's procedures. Efforts will be made to clarify this issue before any further steps are taken.

The complainant will be advised of the aims and objectives of the formal process, the procedures and time-frame involved, and the possible outcomes. He or she will be assured of support as required throughout the process. He or she will be given a copy of this policy.

Procedure which will be followed

The investigation will be governed by the terms of reference which will include the following provisions:

- A provision to the effect that the investigation will be conducted in accordance with this policy
- An indicative time-frame for the completion of the investigation
- Provisions relating to the scope of the investigation, indicating that the investigator will consider whether the complaint falls within the definition of bullying or harassment at work and whether the complaint has been upheld

The person complained against will be notified, in writing, that an allegation of bullying and/or harassment has been made against him or her. He or she will be advised of the aims and objectives of the formal process and procedures and timeframe involved and the possible outcomes. He or she will be assured of support, as required, throughout the process. A meeting will be organised at which he or she is given a copy of the complaint in full and any other relevant documentation, including this policy. He or she will be given time to consider the documentation and an opportunity to respond.

The investigator will meet with the complainant, the person complained against and any witnesses or relevant persons, on an individual basis, with a view to establishing the facts. The complainant, the



person complained against and any witnesses will be entitled to be accompanied by a work colleague at any formal meetings.

All interviews with parties and witnesses will be conducted sensitively and with due respect to the rights of all concerned. The investigation will be conducted on a confidential basis, insofar as that is possible.

Statements from all parties and witnesses will be recorded in writing. Copies of the statements will be agreed with and given to those who make statements to the investigatory manager.

During the Investigation

All parties will continue to work normally during the investigation, unless directed otherwise. Where necessary, parties to the complaint may be placed on authorised paid leave to allow for a fair and thorough investigation. Such paid leave is **not** a disciplinary sanction and this will be made clear to the relevant parties.

The company's management will make every effort to ensure the protection of all involved in the investigation.

The parties to the complaint should not communicate regarding the complaint.

Any effort by any party to intimidate or otherwise influence any complainant, respondent or witness during the course of an investigation will be regarded as a disciplinary matter of the upmost gravity.

Conclusion of Investigation

The objective of an investigation will be to ascertain whether or not, based on the information gathered and/ or on the balance of probabilities:

- The behaviour complained of occurred and, if so
- Whether or not that behaviour amounted to bullying and/or harassment, as defined

The test to be established is whether the complaint is valid and whether the accused employee has a case to answer.

It will be open for the designated investigator to determine whether bullying or harassment occurred.

The investigation will be completed as quickly as practicable, preferably within the indicated time-frame. The investigatory manager will prepare a report which will include the conclusions. The complainant and the person complained against will be given a copy of the report as soon as practicable and will be given an opportunity to comment, within a prescribed period of time, before the company's management decides on any further course of action.

The company's management will decide the action which is to be taken arising from the report, in light of the investigatory manager's report and any comments made by the parties. The company's management will then, in writing, inform the complainant and the person complained against of the next steps which are to occur.

Action where the Complaint is Upheld

If the complaint is upheld, the matter will be treated as a serious disciplinary issue and the company will follow the appropriate disciplinary procedures which may lead to disciplinary action up to and including dismissal. If the perpetrator is not an employee, for example, if he or she is a patron, other appropriate measures will be taken.

The company may also take other appropriate action to support and protect the victim and/or to ensure that similar situations do not arise in the future.

Action where the Complaint is not Upheld

If the complaint is not upheld but the complainant is found to have acted in good faith, the company may take appropriate measures to support both the complainant and the person complained against. This will include taking appropriate measures to ensure that other parties to the investigation are made aware that the finding was not upheld.



Where a complaint is not upheld and is found not to have been made in good faith, the complainant will be the subject of disciplinary action, that is an allegation being made without foundation, and with malicious intent, where a person knowingly or without regard to whether it is true or not, accuses another person of allegedly bullying them. The same principle will apply for witnesses giving evidence in bad faith.

Preservation of Rights and Prevention of Victimisation

Making a complaint under this policy will not affect an employee's statutory rights. No-one will be victimised for making a complaint in good faith or for acting in good faith as a witness in an investigation.

Appeals

If either party is dissatisfied with the outcome of the formal complaints procedure, they may lodge an appeal, normally within 5 working days of receipt of notification of the outcome of the process.

The reason for the appeal should be outlined in writing to the company's management. The appeal will be heard by another person(s), of at least the same level of seniority as the original investigatory manager. The appeal will focus only on the aspect of the case cited by the appellant as being the subject of the appeal.

The grounds of the appeal and any outcome and methodology employed will be appended to the investigation file. Please note that the final report of the investigation itself will not be subject to amendment.

Resolution

Both parties will be given appropriate support and periodical reviews, insofar as is reasonable, after the formal process has been concluded.

External Investigation

In any situation where, by reason of the size of the company, seniority of a complainant or a person complained against, or for any other reason, it is not appropriate for a formal complaint, informal complaint or appeal (of bullying/ harassment/ sexual harassment) to be investigated/ dealt with by an employee of the company, the company reserves the right to appoint an appropriate external person to carry out the investigation/ procedural aspects of this policy. Any such external person will carry out his or her functions in accordance with the provisions of this policy and the company will give appropriate effect to the findings of such an external person.

Other

If your complaint under the dignity at work policy (i.e. bullying and/ or harassment) relates to the Chief Executive, you may **in this instance only** refer the matter to The Chairman of Galway Race Committee Trust who, in conjunction with the HR advisors of Galway Race Committee Trust, will deal with your complaint in accordance with fair procedures.

This policy may be amended from time to time at the discretion of the company's management.

Section 7 - Performance Management

Performance Standards

The quality of service delivered to our patrons is very important to the company. It is fundamental to achieving our mission.

Our performance management approach is aimed at ensuring that we maintain and continuously improve our service standards. The company requires high standards of work, conduct, performance and appearance of our employees and that the company's standards, rules and regulations are upheld at all times by all employees.



Performance Management is an agreed approach to managing performance. The process is about helping team members understand their roles, objectives and key performance indicators, and, giving and receiving feedback whilst putting in place actions to support performance and quality improvement. It enables better communication and participation within and among employees and teams, usually giving:

- Greater clarity on roles and purpose;
- Increased motivation by providing a structure whereby employees can contribute to business goals, thereby increasing morale and a sense of achievement;
- Improved leadership skills at all levels in the company;
- Providing a means for identifying and addressing Learning needs and Development needs;

Effective performance management has many benefits:

- Improves client/ patron satisfaction;
- Improves productivity and efficiency;
- Clarity and ownership of issues across the business;
- Accountability, and with it, responsibility;
- Improved governance and management of risk;
- Resilience to external scrutiny;
- Clarity and leadership for staff in terms of expectations.

An annual performance review meeting will be held with employees to review progress and plan the future development of the company, at a time to suit business and employee schedules. Individuals will be provided with details of the performance standards necessary in their job and feedback on their individual performance, as appropriate. The company is committed to treating all staff fairly and equitably and to helping employees perform effectively.

We want to remind employees that at all times they should feel free to raise matters of concern to them with their own manager, another member of the management team or the Chief Executive, preferably in that order.

The Company reserves the right to update/ improve/ amend its performance management process from time to time in the future and welcomes feedback from our employees in this regard.

We do hope that employees find the performance management process a worthwhile and beneficial aspect of their employment and development at Galway Racecourse.

Procedure to Address Suitability during Probationary Period

The normal disciplinary procedure (see below) does not apply to employees during probation. However, regular meetings will be held with new employees to review progress to determine their suitability to continue to work in the company and pass their probationary period. The probationary period may be extended to facilitate further opportunity for new employees to demonstrate their suitability. However, should this not be the case the contract of employment will terminate either during, or at the end of, the probationary period. Individuals will be provided with details of the performance standards necessary in their job and feedback on their individual performance, as appropriate. The company is committed to treating all staff fairly and equitably and to helping employees perform effectively.

Disciplinary Policy and Procedure

The company is committed to treating all staff fairly and equitably and to helping employees to perform effectively. However, there will be occasions when it may be necessary to invoke disciplinary procedures that are designed to protect the interests of both the company and its employees.

The key aim of the procedure is to be corrective rather than punitive, the objective being to help an individual whose performance or conduct has failed to meet the required standard.



When work falls below an acceptable standard, help and support will be given to the employee to improve. If standards of work continue to fall and there is a necessity for action, it will generally begin with a pre-disciplinary informal discussion. Similarly, when an employee's behaviour is inappropriate and unacceptable, and this is officially deemed misconduct, it will mean the initiation of a pre-disciplinary informal discussion or application of the formal disciplinary procedure, depending on the severity.

If disciplinary action should become necessary then each case will be treated consistently and fairly, and the disciplinary procedure will be strictly observed at all steps. The employee will be given the opportunity to provide their version of events and any extenuating circumstances will be considered. An employee's right to the rules or fair and natural justice will be upheld at all times, and employees will have the right to:

- know the case against him/her
- reply
- due consideration of the issues and the right to a fair hearing
- to be represented (by a work colleague)
- to appeal any formal disciplinary sanction issue

All managers are required to use their best efforts to:

- Provide feedback at early steps to encourage and support employees to improve
- Ensure that all cases are thoroughly investigated
- Avoid any discrimination and focus on objective facts and information
- Prepare carefully and be consistent
- Keep adequate records
- Adhere to this procedure

Breaches of rules and regulations will mean the initiation of Step 1 of the formal disciplinary procedure although it is acceptable to move directly to Steps 2, 3, 4 or 5 where the company views an incident sufficiently serious.

The Disciplinary Procedure

Investigation

Prior to taking the decision to invoke the disciplinary procedure, the company will ensure that the situation has been thoroughly investigated. This is a fact-finding process and may necessitate the gathering of detailed information as well as the carrying out of formal interviews, taking of written statements, etc.

Equally, the employee has the right to gather information in their defence, so they can present details if the decision is taken to invoke the disciplinary procedure.

Once the investigation has been completed, the manager will inform the employee of the findings and the outcome. Where the decision is taken to invoke the disciplinary procedure, the employee will be informed of the case against them, so they can respond in an informed manner at a separate disciplinary hearing.

Where the decision is taken not to take disciplinary action, the employee may be counselled/ provided with coaching/ other supports and details of the issue placed on the employee's personnel file for record keeping purposes.

Suspension

Proper investigation is an integral part of the process and on occasion may require employees to be suspended on full pay whilst it is carried out. Suspension on pay is not considered to be an action taken under the disciplinary procedure. It is there to ensure that issues are dealt with in a fair and reasonable manner, and adequate protection is given to all employees. The company reserves the right to suspend you with full pay pending completion of the investigation or, if appropriate, the disciplinary procedure.

Informal Pre-Disciplinary Counselling Discussion



Where appropriate, prior to using the formal aspects of the company's disciplinary procedure, a pre-disciplinary counselling discussion **may** be held with the employee.

Minor misconduct, poor performance or minor breaches of rules will normally result in informal counselling/ coaching or advice being given by the immediate line manager or another member of the management team. If this approach is not successful, the company may escalate it to the formal disciplinary procedure.

Steps in the Formal Disciplinary Procedure

The aim of our disciplinary procedure is to ensure adherence to the Company's rules, policies and procedures and to aid employees whose performance, attitude or conduct falls below Company standards. An employee's right to the rules or fair and natural justice will be upheld at all times, as stated previously.

From the first formal step of the disciplinary procedure there will be the presence of the employee's immediate manager, where possible, in conjunction with another member of the management team. Employees are advised and have the option to have a work colleague present at any stage of the formal procedure.

You may be suspended on full pay at any time or re-assigned or relocated to another business unit or work location in the course of the disciplinary procedure to facilitate a full investigation. The disciplinary procedure will only apply to an employee who has completed his/her probationary period (see previous section on "Procedure to Address Suitability during Probationary Period").

The procedure outlined below may be abridged or varied by the Company at its discretion or as circumstances may dictate.

The steps in the disciplinary procedure are as follows:

Step 1: Verbal Warning

At the meeting an action plan including a scheduled time for improvement and date for reappraisal will be set. A record of the verbal warning will be given to the employee and a copy will remain active on the personnel file for 6 months. If the conduct or performance is satisfactory after this period, the verbal warning will expire. If there is a further allegation relating to conduct or performance within the 6 month period or if conduct or performance is not improved during this time, the next step/ a subsequent step of the procedure will be implemented. This can happen before the end of the verbal warning period.

Step 2: First Written Warning

At the meeting an action plan including a scheduled time for improvement and date for reappraisal will be set. A record of the first written warning will be given to the employee and a copy will remain active on the personnel file for 12 months. If the conduct or performance is satisfactory after this period, the first written warning will expire. If there is a further allegation relating to conduct or performance within the 12 month period or if conduct or performance is not improved during this time, the next step/ a subsequent step of the procedure will be implemented. This can happen before the end of the first written warning period.

Depending on the nature and seriousness of the offence, a first written warning may be given where no previous verbal warning has been given.

Step 3: Final Written Warning

At the meeting, the final written warning, a copy of which will be given to the employee, will state clearly that the next step will be termination of employment if conduct and/or performance do not improve. A record of the final written warning will be given to the employee and a copy will remain active on the personnel file for 12 months. If the conduct or performance is satisfactory after this period, the final written warning will expire. If there is a further allegation relating to conduct or performance within the 12 month period or if conduct or performance is not improved during this time, the next step/ a subsequent step of the procedure will be implemented. This can happen before the end of the final written warning period.



In more serious cases, where no verbal or first written warning has previously been given, a final written warning may be issued.

Step 4: Action Short of Dismissal

In exceptional circumstances, dependent on the individual case, the company may exercise its discretion to issue a sanction short of dismissal. This action may include suspension without pay, demotion/ redeployment or deferment or loss of increment. This is action short of dismissal and will be at the Company's discretion.

Step 5: Dismissal

There are two alternative courses of action available at this step in the procedure, depending on the circumstances:

1. An employee will be procedurally dismissed if they have failed to improve during the previous steps. Appropriate notice or payment in lieu of notice will be made.
2. In an instance of gross misconduct an employee will be dismissed without going through the previous steps of the procedure. In these circumstances a full investigation will be conducted, and a disciplinary meeting will be held which will follow the normal process and uphold an employee's right to the rules of fair and natural justice. Due to the serious nature of any such situation (i.e. gross misconduct), such as the offences outlined under Gross Misconduct (overleaf), the option of dismissal warrants serious consideration, and the process is likely to result in dismissal without notice or payment in lieu of notice.

Appeals

You may appeal against any warning/ formal disciplinary sanction (i.e. Step 1 to 5 above). Any appeal should be made in writing addressed to the person whose decision you are appealing. The appeal should set out the grounds you are appealing. The appeal will be conducted, where possible, by someone of appropriate seniority who has not been involved in the matter under appeal. Any appeal should arrive at the Company generally no later than 5 working days after notification of the decision.

You will be informed of the findings of the appeal hearing, which will either confirm the disciplinary action already advised, alter it to more appropriate/ serious action, or reverse/ downgrade it.

The decision is the final stage of the internal disciplinary procedure, and no further appeal may be made.

If you are appealing a decision to dismiss, the appeal will not affect the dismissal and a P45 will still be issued to you and all salary payments and benefits will cease. However, if the outcome of the appeal is to reverse the decision to dismiss you, you will be treated, insofar as possible, as if you were never dismissed and any back salary and benefits will be restored to you.

Witness Statements

Statements from witnesses may be required as part of any disciplinary investigation, disciplinary review or appeal. Employees who are witnesses are required to comply with the disciplinary procedure. Although it is not considered necessary (as such, assuming a witness is not under investigation themselves or involved in the alleged misconduct) the employee/ witness will be entitled to be accompanied at such a meeting, if they so wish, as will the investigating/ disciplinary review/ appeal manager. The chosen representative will be allowed to address the hearing and to confer with the witness and to ask questions, but will not be allowed to answer questions on the behalf of the witness.

Offences

a) Misconduct

The Company will normally consider the following list of offences as misconduct and an appropriate reason for initiating disciplinary action:

- Failure to follow the procedures in respect of absence due to sickness or injury, including incident reporting.



- Minor breach of the written statement of terms and conditions of employment
- Minor damage to company property
- Minor breach of company rules
- Minor failure to observe company policies or procedures
- Regular unreasonable and/or unexplained absences
- Lateness
- Poor job performance

These examples are not exhaustive or exclusive, and offences of a similar nature will be dealt with under this procedure.

b) Gross Misconduct

The following offences are examples of gross misconduct:

- Unauthorised use of the company's assets and equipment
- Insubordination e.g. failure or refusal to carry out duties or obey reasonable instructions, except where employee safety may reasonably be in jeopardy
- Sexual harassment, harassment, bullying
- Serious breach of rules, policies or procedures, especially those designed to ensure safety of personnel
- Divulging or misusing confidential information
- Theft or unauthorised possession of any property or facilities of the company or of any employee of the company
- Consumption of alcohol or drugs, or intoxication by reason of alcohol or drugs, which could affect work performance/ employee safety in any way or have an impact on the safety of other employees
- Having illegal drugs in the possession, custody or control of the employee while at work, on the company's premises or during the course of employment (e.g. at race events, company special events/ Christmas party)
- Defrauding or attempting to defraud the company, its patrons, suppliers or fellow employees
- Unauthorised or inappropriate use of e-mail, Internet and/or computer systems
- Falsification of any company records including reports, accounts, expenses claims or self-certification forms
- Serious damage to company property
- Violent, abusive, dangerous, threatening or intimidatory conduct
- Gambling or money lending while at work or on the premises
- Bringing unauthorised person(s) onto company premises
- Conviction of any criminal offence which may render the employee unsuitable for employment
- Serious abuse of time-keeping and attendance procedures

This list of examples is not exhaustive or exclusive, and offences of a similar nature will be dealt with under this procedure. Gross misconduct will result in the initiation or escalation of the company disciplinary procedure and may result in immediate dismissal without notice or pay in lieu of notice, as outlined above.

External Investigation

In any situation where, by reason of the size of the company, gravity of a disciplinary issue or for any other reason, it is not appropriate for a formal investigation, formal disciplinary hearing or appeal to be dealt with by an employee of the company, the company reserves the right to appoint an appropriate external person to carry out the investigation. Any such external person will carry out his or her functions in accordance with the provisions of this policy and the company will give appropriate effect to the findings of such an external person.

This policy may be amended from time to time at the discretion of the company's management.



Grievance Policy and Procedure

It is acknowledged that, on occasion, employees may have a grievance in the workplace. Effective procedures are necessary to ensure that grievances are handled in accordance with the principles of natural justice and fairness, that employees' grievances are fairly examined and processed and that a good employee relations atmosphere is maintained.

The company wishes to provide every opportunity for an employee to express themselves without fear of jeopardising their position. It is in everybody's interest to establish a clear procedure for the resolution of any issues that may arise in the workplace. Full recognition is given to the significance of personal grievances. All grievances will be dealt with in a confidential manner and no employee will be penalised for raising a grievance in good faith.

It is the responsibility of every manager within the company to deal with all grievances both effectively and efficiently so that employees feel their problems have been addressed, and to notify the Chief Executive of the issues which emerge, as appropriate.

The company will endeavour to ensure that, where possible, grievances are heard within five working days of being received and that decisions are communicated within five working days of being heard. However, it should be noted that it is not always possible to adhere to these timelines due to business demands, leave arrangements etc..

All meetings and outcomes will be documented, and a copy given to you. A copy will be placed on an employee's personnel file.

Definition of a Grievance

A grievance is any event, condition, rule or practice, which you believe violates your civil or employment rights, treats you unfairly or causes you any degree of unpleasantness or unhappiness on the job. A grievance may also deal with an attitude, a statement, or an opinion held by a co-worker.

Grievance Procedure

In order to ensure that fair and reasonable employment practices are operated across the board, the following procedure has been designed to resolve any issues that may arise in the workplace.

Informal Process

If you have a problem or grievance relating to any aspect of your employment with the company, you should first discuss it on an informal basis with your line manager. If your grievance is of a kind that you feel unable to raise it with your manager, you should raise the matter with a more senior manager, i.e. the Chief Executive, who will endeavour to deal with and resolve your grievance(s) as soon as is reasonably practicable. However, if it cannot be dealt with informally, the formal process described below will be followed.

Formal Process

At any stage in the formal process, a company colleague may accompany you.

Step 1 - Notification

Raise the grievance with your line manager, explaining that you wish to use the formal grievance procedure. Your line manager will arrange a meeting with you to discuss the matter and will listen to your concerns. If the grievance is of a kind where you feel unable to raise it with your manager, you should discuss the problem with another manager/ the Chief Executive.

Step 2 – Grievance Meeting & Decision

You will be asked to provide a written statement outlining the nature of the grievance. The reviewer will consider the information presented and you will be given an opportunity to discuss the issue. Following the meeting, the reviewer will come to a decision or make a recommendation. The decision will then be communicated to you in writing as soon as reasonably practicable following the meeting.

Step 3 - Appeal



If you are not satisfied with the decision or recommendations made at step 2, you may then proceed to step 3 by notifying, in writing, the next level of management (who has not previously been involved in this process) of your wish to appeal. You will have been notified of the relevant appeals person/manager at Step 2.

This should be done normally within five working days of receiving the decision or recommendations from step 2.

Your request should set out the details of the problem and provide any other relevant information, including the reason(s) why you are dissatisfied with the previous outcome, i.e. the basis for your appeal.

The reviewer will meet with you to discuss the issue and will consider all the available information. The reviewer will subsequently communicate his/her decision or recommendations to you. The decision of this reviewer/ the appeal decision is the final stage of the internal grievance procedure, and no further appeal may be made.

At Step 3 you will be given a hearing, normally within five working days of the request, and a final written response, normally within a further five working days, where possible. However, it should be noted that it is not always possible to adhere to these timelines due to business demands, leave arrangements etc.

Witness Statements

Statements from witnesses may be required as part of any grievance investigation, review or appeal. Employees who are witnesses are required to comply with the grievance procedure. Although it is not considered necessary (as such, assuming a witness is not under investigation themselves or involved in the alleged grievance) the employee/ witness will be entitled to be accompanied at such a meeting, if they so wish, as will the investigating/ grievance review/ appeal manager. The chosen representative will be allowed to address the hearing and to confer with the witness and to ask questions, but will not be allowed to answer questions on the behalf of the witness.

External Investigation

In any situation where, by reason of the size of the company, seniority of a complainant or a person complained against, or for any other reason, it is not appropriate for an informal grievance, formal grievance or appeal to be investigated/ dealt with by an employee of the company, the company reserves the right to appoint an appropriate external person to carry out the investigation/ stages of the process as outlined in this policy. Any such external person will carry out his or her functions in accordance with the provisions of this policy and the company will give appropriate effect to the findings of such an external person.

Other

If your grievance is in relation to the Chief Executive, you may **in this instance only** refer the matter to The Chairman of Galway Race Committee Trust who, in conjunction with the HR advisors of Galway Race Committee Trust, will deal with your grievance in accordance with fair procedures.

This policy may be amended from time to time at the discretion of the company's management.

Performance Appraisal

The company operates a performance management process in order to promote high performance standards by employees, ensure achievement of business goals, develop employee skills and promote clear two-way discussion between managers and employees.

Performance meetings provide the basis for an in-depth discussion between the employee and manager regarding the employee's performance of their duties, their development needs, and future



career direction. Continual dialogue and feedback will take place as part of regular on-going communication to reflect the need for continuous performance management.

It is our policy to ensure all employees have a clear understanding of their role and performance expectations, are set challenging goals and receive frequent specific feedback and recognition on how their performance as an individual and team member matches expectations. It is also important that both manager and employee reflect on development needs, what learning support will be of benefit to you, and put action plans into place.

Performance standards are tied to key result areas of the job and therefore will be significant, results oriented, measurable and economical. They should always reflect recurring operational, problem solving, and creative aspects of the job. Where an employee is not performing to the required standard, feedback, coaching and support will be provided to improve performance levels. If the required standard is not being achieved within the agreed time frame, a manager can initiate the disciplinary procedure as outlined previously.

While happening on an on-going basis, the performance of employees will be reviewed during and at the end of the probationary period and thereafter at least once annually. Employees can expect that all performance reviews will be conducted in a fair and timely manner.

It is important that both parties prepare prior to any review meeting. The manager should ask the employee to think about their work performance since the previous review meeting, what current problems exist (if any), where help is required, and how this help can be provided. Such a formal review needs to be carried out at least every year and details of same will be kept on an employee's personnel file.

Training and Development

Stimulated by our desire to continually improve our organisation's effectiveness together with individual performance, the company is committed to the on-going training and development of all its employees. We believe a well thought out training and development programme is one of the most exciting and convenient tools for attracting, developing, motivating, and retaining excellent employees.

We also actively encourage our employees to take personal responsibility for their own training, learning and development and we will support initiatives which employees take to enhance their knowledge; see also Section 4, and the Educational Assistance Policy therein.

The company will provide employees with equal opportunity and exposure to training and development in so far as such training and development relates to the business needs.

Discussion on training and development requirements take place at annual performance review/ Personal Development Plan meetings. Training needs will be agreed with your manager and actions identified. Consideration will be given to whether training should be internal or external and what materials, coaching etc. will help. Details of all training received (formal and informal) will be recorded.

Throughout the year the company will devise, implement and conduct programmes, both in-house and external, designed to contribute to the achievement of the above aims and objectives.

Employees will be required to attend relevant courses/seminars as part of their training and development and in order to acquire and maintain the skills necessary to remain effective in their roles. Attendance on certain programmes will be mandatory, for example health and safety, in order to ensure that the fullest range of functions and skills is attained and utilised across the organisation.

Induction Training Policy

The purpose of the induction programme is to allow all new, redeployed, or promoted employees to be given the necessary information about their job and the organisation, to assist their integration into their new role in the organisation, to enhance their motivation, and to achieve improved optimal productivity.



All new employees receive a short induction course. This includes being given information on their new role, the department they have joined, facilities available to employees, company policies and procedures, conditions and agreements relating to their employment, and a copy of this handbook, and other relevant information.

An assigned employee will introduce new employees to employees and managers, and conduct them through the premises in order to allow them to familiarise themselves with all company facilities.

Health and safety procedures, including emergency procedures such as Fire, Evacuation and Accident reporting will also be explained and demonstrated at regular, prescribed intervals thereafter.

The following is an indicative list of items to be covered during induction:

- New employee starter form and terms and conditions of employment (contract) issued and signed
- IT and systems set up
- Job-related policies and procedures explained/ training provided
- Fire extinguishers identified
- Assembly points visited
- First Aid boxes identified
- Canteen visited
- Washroom and toilets/ welfare facilities pointed out
- Location of notice boards identified
- Introduced to colleagues
- Details of Safety Statement explained
- Handbook issued and acknowledgement forms signed

Ongoing Development

The company will also consider access to a range of development programmes which may help employees to build their skills and acquire the core knowledge and skills they need to carry out their roles effectively. Further information will be given to you as necessary by your manager.



Section 8 – IT & Communications

Electronic Communications, Social Networking and IT

Introduction

This section should be read in conjunction with other IT Policies such as our Information Security Policy. IT and Communication plays a vital and central role in the conduct of our business.

How you communicate with people not only reflects on you as an individual but also on us as a business. As a result of this the company values your ability to communicate with colleagues, clients/ patrons and business contacts but we must also ensure that such systems and access are managed correctly, not abused in how they are used or what they are used for.

General Principles

You must use our information technology and communications facilities sensibly, professionally, lawfully, consistently with your duties and in accordance with this policy and other company rules and procedures.

At all times employees must behave with honesty and integrity and respect the rights and privacy of others in relation to electronic communication and information. The company reserves the right to maintain all electronic communication and files.

All PC/ laptop/ iPad/ network access will be through passwords, and no individual is permitted onto the system using another employee's password. Employees are not permitted to share their password with anyone inside or outside the Company. Individuals will be allowed to set their own passwords and must change them as frequently as requested by the system set-up requirements. Multi-factor authentication must be enabled on all password protected resources where possible.

All information relating to our clients/ patrons and our business operations is confidential. You must treat our paper-based and electronic information with utmost care.

Many aspects of communication are protected by intellectual property rights which can be infringed in a number of ways. Downloading, copying, possessing and distributing material from the internet may be an infringement of copyright or of other intellectual property rights.

Particular care must be taken when using e-mail as a means of communication because all expressions of fact, intention and opinion in an e-mail may bind you and/or the Company and can be produced in court in the same way as other kinds of written statements.

If you are speaking with someone face to face, via the telephone, in writing via whatever medium you are a representative of the Company. Whilst in this role, you should not express any personal opinion that you know or suspect might be contrary to the opinions of the Chief Executive or Company policy.

Use of Electronic Mail

Business use

Always use the "Bcc" box when mailing to groups whenever the members of the group are unaware of the identity of all the others (as in the case of marketing mailing lists), or where you judge that the membership of the group of one or more individuals should perhaps not be disclosed to the others, because if you use the "Cc" box each recipient is informed of the identity (and in the case of external recipients, the email address) of all the others. Such a disclosure may breach any duty of confidence owed to each recipient, breach the Company's obligations under the General Data Protection Regulations or may inadvertently disclose confidential business information such as a marketing list. This applies to both external and internal e-mail.



Expressly agree with the client/ patron that the use of e-mail is an acceptable form of communication, bearing in mind that if the material is confidential, privileged or commercially sensitive then un-encrypted e-mail is not secure.

In light of the security risks inherent in web-based e-mail accounts, you must not e-mail business documents to your personal web-based accounts. You may send documents to a client's/ patron's web-based account if you have the client's/ patron's express written permission to do so. However, under no circumstances should you send sensitive or highly confidential documents to a client's/ patron's personal web-based e-mail account (e.g. Yahoo, or Hotmail), even if they ask you to do so.

Personal use

Our e-mail facilities are provided for the primary purposes of our business. Incidental personal usage of company e-mail facilities is prohibited. The company reserves the right to monitor communications for the reasons shown below and all Company mailboxes and information remain property of the company.

Under no circumstances may the Company's facilities be used in connection with the operation or management of any business other than that of the Company or a client/ patron of the Company unless express permission has been obtained from a member of management.

The Company will not tolerate the use of the email system for unofficial or inappropriate purposes, including:

- any messages that could constitute bullying, harassment or other detriment;
- on-line gambling;
- accessing or transmitting pornography;
- transmitting copyright information and/or any software available to the user; or
- posting confidential information about other employees, the Company or its clients/ patrons or suppliers.

Use of Internet/ Intranet/ Extranet/ Cloud

We trust you to use the internet/ intranet/ extranet/ cloud sensibly. Although these facilities are provided for the purposes of our business, we accept that you may occasionally want to use them for your own personal purposes. This is permitted on condition that all the procedures and rules set out in this policy are complied with and your use of the internet does not interfere in any way with the performance of your duties.

Whenever you access a web site, you should always comply with the terms and conditions governing its use. Care must be taken in the use of information accessed through the Internet. Most information is unregulated, and as such there is no guarantee of accuracy.

The use of the Internet to access and/or distribute any kind of offensive material, or material that is not work-related, leaves an individual liable to disciplinary action which could lead to dismissal.

You must not:

- use any images, text or material which are copyright-protected, other than in accordance with the terms of the license under which you were permitted to download them;
- introduce packet-sniffing or password-detecting software;
- seek to gain access to restricted areas of the Company's network;
- access or try to access data which you know, or ought to know, is confidential;
- introduce any form of computer virus; nor
- carry out any hacking activities.

Virus Protection Procedures



In order to prevent the introduction of virus contamination into the software system the following must be observed:

- all USB devices should be encrypted; and
- unauthorised software including public domain software, magazine cover disks/CDs or Internet/World Wide Web downloads must not be used; and
- all software must be virus checked using standard testing procedures before being used

Use of Computer Equipment

In order to control the use of the Company's computer equipment and reduce the risk of contamination the following will apply:

- The introduction of new software must first of all be checked and authorised by a member of management or a client's nominated senior member of management before general use will be permitted.
- Only authorised staff should have access to the Company's computer equipment.
- Only authorised software may be used on any of the Company's computer equipment.
- Only software that is used for business applications may be used.
- No software may be brought onto or taken from the Company's premises without prior authorisation.
- Unauthorised access to the computer facility will result in disciplinary action.
- Unauthorised copying and/or removal of computer equipment/software will result in disciplinary action; such actions could lead to dismissal.

System Security

Security of our or our clients'/ patrons' information is of paramount importance. We owe a duty to all of our clients/ patrons to ensure that all of our business transactions are kept confidential. If at any time we need to rely in court on any information which has been stored or processed using our IT systems it is essential that we are able to demonstrate the integrity of those systems. Every time you use the system you take responsibility for the security implications of what you are doing.

The Company's system or equipment must not be used in any way which may cause damage, or overloading or which may affect its performance or that of the internal or external network.

Keep all confidential information secure, use it only for the purposes intended and do not disclose it to any unauthorised third party.

Working Remotely

See Section 4 above re. Remote/ Home Working Policy.

This part of the policy and the procedures within it apply to your use of our systems, to your use of our laptops, and also to your use of your own computer equipment or other computer equipment (e.g. client's equipment) whenever you are working on Company business away from our premises (i.e. working remotely).

When you are working remotely you must:

- password protect any work which relates to our business so that no other person can access your work;
- position yourself so that your work cannot be overlooked by any other person;
- take reasonable precautions to safeguard the security of our laptop computers and any computer equipment on which you do Company business, and keep your passwords secret;
- inform the Gardai and the Company as soon as possible if either a Company laptop in your possession or any computer equipment on which you do our work has been stolen; and
- ensure that any work which you do remotely is saved on the Company system or is transferred to our system as soon as reasonably practicable.



- PDAs or similar hand-held devices are easily stolen and not very secure so you must password-protect access to any such devices used by you on which is stored any personal data of which the Company is a data controller or any information relating our business, our clients/ patrons or their business.
- ensure a PIN lock is maintained on all mobile phones which have access to corporate/ company data.
- Multi-factor authentication must be enabled on all password protected resources where possible.

Monitoring of Communications by the Company

The Company is ultimately responsible for all business communications but subject to that will, so far as possible and appropriate, respect your privacy and autonomy. The Company may monitor your business communications for reasons which include:

- providing evidence of business transactions;
- ensuring that our business procedures, policies and contracts with staff are adhered to;
- complying with any legal obligations;
- monitoring standards of service, staff performance, and for staff training;
- preventing or detecting unauthorised use of our communications systems or criminal activities; and
- maintaining the effective operation of Company communication systems.

From time to time the Company may monitor telephone, e-mail and internet traffic data (i.e. sender, receiver, subject; non-business attachments to e-mail, numbers called and duration of calls; domain names of web sites visited, duration of visits, and non-business files downloaded from the internet) at a network level (but covering both personal and business communications). This includes monitoring of any additional accounts you may be requested to set up for the purposes of performing your work tasks, which are subject to the same rules as your work email account. Information acquired through such monitoring may, objectively and reasonably, be used as evidence in disciplinary proceedings.

Sometimes it is necessary for us to access your business communications during your absence, such as when you are away because you are ill or while you are on holiday.

Data Protection

As an employee using our communications facilities, you will inevitably be involved in processing personal data for the Company as part of your job. Data protection is about the privacy of individuals, and is governed by the General Data Protection Regulations (GDPR).

Whenever and wherever you are processing personal data for the Company you must keep this secret, confidential and secure, and you must take particular care not to disclose such data to any other person (whether inside or outside the Company) unless authorised to do so. Do not use any such personal data except as authorised by us for the purposes of your job. If in doubt, ask a member of management.

The General Data Protection Regulations give every individual the right to see all the information which any data controller holds about them. Bear this in mind when recording personal opinions about someone, whether in an e-mail or otherwise. It is another reason why personal remarks and opinions made should be given responsibly, must be relevant and appropriate as well as accurate and justifiable.

For your information, the General Data Protection Regulations provide that it is a criminal offence to obtain or disclose personal data without the consent of the data controller. "Obtaining" here includes the gathering of personal data by employees at work without the authorisation of the employer. You may be committing this offence if, without authority of the Company, you exceed your authority in collecting personal data; you access personal data held by us; or you pass them on to someone else (whether inside or outside the Company).

Use of Social Networking Sites

Any work-related issue or material that could identify an individual who is a client/ patron or work colleague, which could adversely affect the company, a client/ patron or our relationship with any client/



patron must not be placed on a social networking site. This means that work related matters must not be placed on any such site at any time either during or outside of working hours and includes access via any computer equipment, mobile phone or PDA.

In addition, you must ensure that any comments which you post on social media are not in breach of any of the Company's policies/ this handbook including, but not limited to, Customer Care & Code of Conduct, Business Ethics & Confidentiality, Dignity at Work, Equal Opportunities, External Communications. You are personally responsible for the content you publish on any form of social media platform. When in doubt, you should seek guidance from your line manager or the Chief Executive of the company.

The company may require that an employee removes any comments, information, postings, material etc. which are in breach of this policy. Inferences may be drawn from any refusal by the employee to remove the material. Any request for removal will be on a "without prejudice" basis and shall not constitute any assumption that an employee has breached the policy, but will be requested in order to facilitate a full investigation (if/ where necessary) to take place. An investigation may follow in accordance with the company's Disciplinary Procedure.

You are not permitted to access social media sites during working hours; this includes via company equipment or your own personal devices.

Any breach of the Company's expectations in relation to use of social networking sites may, depending on the seriousness, result in disciplinary action up to and including dismissal.

Confidentiality

Employees are not permitted to register with sites or electronic services in the Company's name without the prior permission of their line manager. They are not permitted to reveal internal company information to any sites, be it confidential or otherwise, or comment on company matters, even if this is during after-hours or personal use. The company confidentiality policy applies to all electronic communication and data.

Compliance with this Policy

If there is anything in this policy, or in any of the associated IT policies, that you do not understand, please discuss it with the Chief Executive.

Please note that the procedures and policies outlined in this policy, and in any related policy, may be reviewed or changed at any time.

Abuse and Disciplinary Procedure

Any employee found to be abusing the company electronic communication system, or not operating in line with this policy, will be subject to disciplinary action up to and including dismissal. This includes any attempt to circumvent system security, including firewalls, put in place to protect the Company. Inappropriate use of e-mail, Internet and other electronic communications services includes, but is not limited to:

- Sending messages which could be taken as slurs or harassment on the basis of age, gender, race/ nationality/ ethnic origin, religion/ religious belief(s) (or lack thereof), disability, civil status, family status, sexual orientation or membership of the Traveller community
- Email that is fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory, or otherwise unlawful or inappropriate
- Sending or posting threatening, offensive, malicious or libellous messages
- Forging or attempting to forge email messages



- Creating or sending chain letters through electronic mail
- Revealing internal company information to any sites, be it confidential or otherwise, or commenting on company matters at any time
- Reading, deleting, copying or modifying the e-mail of others without their permission
- Violating your obligations regarding confidential, proprietary and trade secret information
- Accessing any web site which could be regarded as offensive, in bad taste or immoral (whether or not the content is legal)
- Supporting illegal activities, breaking into any computer, whether the company's or not, or encouraging any act of violence
- Using company equipment or systems for personal gain or purposes unrelated to the Company's business
- Engaging in activities outside the bounds of ethical or proper behaviour
- Breaching any of the Company's other policies or guidelines

Any suspicion or evidence of abuse must be immediately reported by all employees to the Chief Executive of the Company.

Communications

Company Philosophy

The Company believes that open, effective communication is essential to producing an efficient and motivating work environment of mutual understanding and confidence.

The most important means of communication for the Company are the informal one-to-one discussions.

The Company endeavours to keep all employees informed of all relevant Company issues but encourages employees to ask questions at any time if clarification or information is needed.

Partnership: Galway Racecourse supports and operates a partnership approach in which management is committed to consulting and engaging with employees. All Employees are encouraged to participate in the process of change and the ongoing development of a premium service in their area of specialty and across all interactions with our patrons. This provides opportunity for staff and managers to work together to bring about client/ patron-focused change. The role and purpose of this agreement is to act as a mechanism through which initiatives to address work-related issues and challenges are progressed.

Internal Communications

The Company uses a wide variety of tools to help develop and maintain open channels of communication within the group. The Chief Executive and employees are encouraged to have constructive dialogue with each other. Employees will be informed about, and given opportunities to participate in, decisions affecting their work life in a way that is consistent with effective management.

Information, in as far as is practicable, is communicated internally before it is disseminated externally. All written information is produced in a clear, concise manner, suitable for the audience and written in plain language. Information is communicated through a variety of avenues e.g. verbal or written (electronic or hard copy). These may include, but are not limited to, those listed below:

Staff Briefings



Galway Racecourse management conducts company-wide information sessions and staff briefings. These can be used to inform all staff of current and future developments in the Company.

Emails and Memos

All user memos are circulated by email so that information is accessible to all.

Open Door Policy

For quick and satisfactory resolution of general problems, the Open-Door Policy allows reasonable access to their own line manager, but also to the Chief Executive of the company, without fear that such action will penalise the employee.

Noticeboards

Written communications (e.g. email, memos) are used to keep employees informed on matters that are important to them. In addition, announcements of job openings, health and safety items, social events and any other relevant points of information, are posted on the noticeboards and/ or will be distributed via email.

External Communications

Communications with the Media: Enquires from the media in relation to any aspect of the company's activities, policies or clients/ patrons should be referred as follows:

- During normal working hours: The Chief Executive.
- Outside normal working hours: The Chief Executive.

Giving interviews, statements or any other information connected with the services provided by the company should not be undertaken without the prior approval of the Chief Executive or the delegated official spokesperson for the company. Such unapproved actions have the capacity to prejudice the interests and reputation of the company.



Section 9 - Health & Safety

It is company policy to provide a safe and healthy work environment for all employees and to meet our duties to customers, contractors and visitors. The company acknowledges its role in protecting the safety, health and welfare of all people employed in the organisation and affected by the workplace. We are committed to implementing safe work systems and methods to ensure the safety, health and welfare of all. Our policy and approach to safety is clearly outlined in the Galway Racecourse Safety Statement, which employees are required to familiarise themselves with. At Galway Racecourse, we want to encourage a work environment whereby employees not only concern themselves with their own Health & Safety, but also with the Health & Safety of their colleagues in addition to visitors, contractors, clients/ patrons etc.

The company understands its legal obligations and its commitment to comply with the Safety, Health and Welfare at Work Act, 2005, and any other legislation such as the General Applications Regulations 1993 or as required under EU Law.

All employees are required to adhere to the following responsibilities and expectations regarding Health & Safety:

- Cooperate with your Employer;
- To use any protective equipment provided to protect you in the course of your work;
- Do not misuse or interfere with anything provided to protect safety, health and welfare;
- Attend training courses and programmes as required;
- To report accidents and incidents immediately (i.e. those involving you, colleague(s), clients/ patrons, contractors etc.)
- To take reasonable care to protect the health and safety of yourself and of other people in the workplace;
- Not to engage in improper behaviour that will endanger yourself or others, e.g. regarding the use of equipment/ machinery ;
- Not to be under the influence of drink and/ or drugs in the workplace;
- To undergo any reasonable medical or other assessment if requested to do so by the employer
- To report any defects in the place of work, systems of work or equipment which might be a danger to the health and safety of yourself or others

Fire Prevention

The Company's policy on fire safety including fire prevention, fire exits and fire prevention measures are outlined in the Company's Safety Statement. Employees are required to familiarise themselves with the location of their nearest fire exit (closest to their regular workstation). It is important that you familiarise yourself with the location of fire extinguishers, alarm and assembly points in your area of work.

Manual Handling

The Company's policy on manual handling including avoidance of manual handling operations and reducing the risk of injury are outlined in the Company's Safety Statement, and which all employees should familiarise themselves with. It is mandatory for all staff to attend a manual handling course when requested to do so. Your line manager will make the necessary arrangements for you.

VDU Assessment

Galway Racecourse carries out risk assessments of VDU workstations including the keyboard, the VDU screen, printer, work chair, work desk and VDU environment. Employees are expected to implement the results of these assessments. This includes, but is not limited to, the following:

- Personnel should not work excessively at a VDU screen for long periods of time



- Adequate breaks should be taken, during which time alternative work that involves light exercise should be undertaken, e.g. filing/ photocopying.
- During the break from VDU work gentle stretching of limbs would be beneficial

Accidents/ Incidents at Work

Employees are obliged to ensure accidents or injuries are prevented if possible. All accidents/incidents, including near misses, which occur to an employee, contractor, client/ patron or visitor etc., must be recorded as soon as possible and reported to your line manager/ a manager in the organisation. Employees are required to cooperate with the accident reporting system and will provide information, which will assist in establishing the circumstances surrounding the accident. Loss and theft incidents should also be reported to the manager.

It is the responsibility of all employees to report dangerous conditions, faulty equipment etc. – don't assume that someone else will do it!

Galway Racecourse recognises and values the commitment and dedication of its employees in delivering a high-quality service and has in place comprehensive support mechanisms for staff to promote their health and well-being.

Occupational Injuries

Immediate treatment for all occupational injuries is to be reported to your line manager/ a manager, e.g. back injuries, sharps/inoculation injuries, burns etc.

Health Surveillance

The Manager looks after the occupational health and welfare of employees with emphasis on health promotion and preventing work-related accidents and disease. This is done in various ways i.e. sickness absence management, manual handling advice, infectious disease prevention, workplace inspections with ergonomic advice, immunisation and advice on compliance with legislation and hazardous substance assessments.

Risk Assessment

The Company will advise employees on health issues pertaining to work as part of the risk management programme, as and when appropriate/necessary.

Breach of Safety Rules, Policies and Procedures

Any breach of the Company's Safety Statement, safety procedures of safe systems of work will be taken very seriously and may need to be addressed under the Company's Disciplinary Policy & Procedure.

Smoke Free Workplace

The company is committed to providing a healthy work environment for its employees. Second-hand smoke is a known carcinogenic health hazard and therefore, it will be treated in the same manner as any other health hazard. Smoking is prohibited across the company in all enclosed areas, and only allowed in areas that are out of sight of racecourse/event attendees.

While managers are responsible for ensuring strict compliance with this policy, all employees share in the responsibility for adhering to and enforcing this policy. The disciplinary procedure will be used should any employee choose not to adhere to this policy.

This policy extends to the use of vapes and e-cigarettes.

Alcohol and Drugs in the Workplace

The company requires that all employees should report for work in a fit and healthy manner.



The company prohibits the unlawful use, possession, distribution or manufacture of any controlled substance on company property or during work time or on company business. Arriving at work under the influence of alcohol or any controlled substance is strictly prohibited.

Should there be a question over an employee's fitness for work, due to suspected intoxication because of drink or drugs, the following should take place,

- the employee should be observed and talked to by at least 2 members of the management team
- the evidence of intoxication should be discussed with the employee (they will be allowed to have a work colleague present at such a meeting, should they wish)
- the employee should be suspended with pay and sent home and/ or the employee can be asked to attend a medical practitioner to be tested for intoxicants
- the employee should be asked to return for a meeting the following day, possibly a disciplinary meeting, where there is evidence of, and possibly where the employee admits, intoxication

Careful consideration will be given as to the personal circumstances leading up this type of behaviour. In the event that there are no mitigating circumstances then the disciplinary procedure may be used, up to and including dismissal.

Employees generally will be encouraged to seek help or assistance from the organisation's support service. If an employee is provided with support and they do not accept it, or their performance does not improve, the disciplinary procedure may be invoked.

A controlled substance means any drug not legally obtainable. Legally prescribed and over-the-counter drugs become controlled substances when they have not been prescribed for medical treatment by an accredited physician, or they are not used for the purpose for which they were intended, or when excessive doses are taken.

Drugs and Alcohol Testing Policy

Under the Safety, Health and Welfare at Work Act, 2005 while at work, an employee is required to ensure that he or she is not under the influence of an intoxicant to the extent that he or she is in such a state as to endanger his or her safety, health or welfare at work or that of any other person.

An "Intoxicant" can include alcohol and drugs and any combination of drugs and/or alcohol, whether legal or illegal, whether prescribed or not.

The Safety, Health and Welfare at Work Act, 2005 states that if reasonably required by his or her employer, an employee must submit to any appropriate, reasonable and proportionate test for intoxicants by, or under the supervision of, a registered medical practitioner. The organisation therefore upholds its legal right to conduct a testing for intoxicants in the following situations:

- during a pre-employment medical check, as part of the conditional offer of employment
- where the organisation is of the opinion that the employee appears to be under the influence while at work; this may involve an employee's line manager and another member of the senior management team observing the employee's physical appearance as indicating intoxication such as: unsteady on feet, slurred speech, out of character behaviour, blood shot eyes or shaky hands

Where a situation occurs whereby an employee has been observed and may be considered to be under the influence of an intoxicant while at work, his or her line manager or a member of the senior management team will ask him or her to leave his or her work area and he or she will be informed that there is a question over his or her fitness for work and that a test will be conducted. The employee will be prohibited from carrying on work duties, using machinery or equipment or driving his or her vehicle or any organisation vehicle.



The testing will either take place privately at a tester's premises (e.g. medical practitioner). If the testing is taking place at the testers premises, the organisation will arrange transport for the employee.

It is organisation's policy that the employee is required to sign a consent form which allows the tester to disclose the results of the test to the organisation. The employee is also required to produce photographic identification at the time of testing, for example organisation I.D. card or drivers licence. Should an employee refuse to adhere to the organisation's request to intoxicant testing the employee will be sent home and this will be considered to be a failed test. Failure to comply with this procedure will result in the company invoking the disciplinary procedure.

The following tests may be conducted:

- Alcohol: urine sample, breathalyser, blood sample or salivary swab
- Drugs: blood, urine or hair sample

This list is provided for illustrative purposes only and is not exhaustive.

Once the test has been conducted the employee may be suspended, with pay, until the full laboratory analysis is returned. This is not considered disciplinary action. The employee is prohibited from attending the work place during this time. Once the test results have been received the employee will be asked to attend a meeting with his/her line manager and/or a member of the senior management team. The outcome will be dependent on the test results but may involve referral to a suitable/ appropriate employee assistance programme, counselling, initiation of the disciplinary procedure (up to and including dismissal) or a performance improvement plan or alternative action.

Personal Protective Equipment

Personal Protective Equipment (PPE) is designed to protect employees from risks to their health and safety and includes all protective equipment and clothing. All employees will be informed, before they begin work, of the safest method of carrying out their particular work and will be given instructions and training on how to use PPE correctly, where/ if applicable. Before commencing work, employees will also be made aware of any PPE they are required to wear and use when carrying out their work.

Employees will be provided with all the necessary PPE. Employees MUST wear and use all required PPE at all required times and in the correct manner. Failure to do so will result in disciplinary action up to and including dismissal. Employees will not be charged for the cost of any PPE used solely for work.

Employees have a duty to check their PPE and ensure that it is maintained and stored correctly. Should an employee consider that there are any defects in his/her PPE or that it does not meet his/her needs, he/she should immediately inform their line manager. Employees must not begin or continue to work if there is something wrong with their PPE. The person responsible for safety in the organisation will regularly check the functionality of all PPE.

Work/ Life Balance

General Employee Wellbeing

Galway Racecourse recognises the importance of a healthy work/life balance for its employees. At the centre of this balance is the short, medium and long-term focus on a balance between providing a service now and taking care of our employees to ensure that we can continue to deliver the service in the future.

Flexible leave arrangements

This arrangement aims to facilitate equality of opportunity for men and women in the workplace. Arrangements for work/life balance include making arrangements with employees enabling and facilitating them to avail of their statutory entitlements including annual leave, maternity/ adoptive leave, paternity leave, force majeure leave, parental, parent's and carer's leave. See Section 5 within this handbook for further details.



Flexible Hours

Flexible hour's arrangements and reduced working hours are other non-statutory arrangements, which may be granted with the permission of your Manager and are dependent on business needs. These arrangements include reduced working hours.

Reduced Working Hours

An agreement on reduced working hours ensures that part-time employees are entitled to all the same benefits as their full-time counterparts on a pro-rata basis. Employees should in the first instance discuss any changes in working hours with their line manager. Flexible working hours are conditional on there being no adverse effect on the Company service and commitment to meeting its operational requirements

Note – any request for flexible working/ flexible hours/ reduced hours must be made in writing to your line manager in the first instance.

Stress Management

The company is committed to providing a positive environment in which employees do not feel the adverse impacts of stress. We recognise that stress is not always a negative occurrence and indeed a moderate level of stress can be seen as a positive factor. It is only when the stress under which employees are placed becomes excessive that there should be cause for concern.

In order to implement a positive environment and minimise the negative impact of stress, the company commits to the following:

- Making employees aware of the Safety Statement, which highlights the company's commitment to protect the health and safety of all employees
- Inform all employees of the company's Grievance Policy and Procedure and Dignity at Work Policy (as included in this handbook, see above), that provide employees with the opportunity to raise issues, explore the underlying causes and have them resolved
- Providing an open-door policy for employees to feel comfortable about raising any such concerns or issues with their manager, or any manager in the organisation
- Providing information on stress and ways of coping with stress in general (not isolated to stress at work) and, in some instances, referral to a suitable/ appropriate employee assistance programme; for example the industry wide programme available to employees in the horse racing industry



Section 10 - General Company Information

Relationships at Work

We recognise that, from time to time, close personal relationships may develop between members of staff, management, clients/ patrons etc. In order to ensure that potential conflicts of interest are avoided, members of staff who are in that position are strongly recommended to advise another member of the management team.

Any such information will be treated in the strictest confidence. We fully acknowledge the right of employees to privacy in their personal affairs. However the company retains the right to ensure that two people with a personal relationship shall not be permitted to work in a position or department, where it is deemed inappropriate, especially where one person would directly or indirectly supervise another or where there is the possibility of a conflict of interest.

Personal Property

The company does not accept any responsibility for any personal property belonging to an employee, which is left on the premises. Employees are strongly advised not to bring large sums of money or valuable articles to the workplace. Where lockers are provided, employees are required to use them for all personal belongings.

Any employee found interfering with another employee's belongings would be subject to disciplinary action, up to and including dismissal.

Company Property

Each employee is required to respect all company equipment used in the course of their employment, for example computers, materials, equipment, printers. Misuse of such equipment or waste of company equipment/ resources is considered a serious offence and would be dealt with under the disciplinary procedure. Detected abuse should also be reported to the Chief Executive of the company.

Data Protection and Personnel Information

Introduction

We may have to collect and use information about people with whom we work. These may include members, current, past and prospective employees, clients/ patrons, and suppliers. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulations (GDPR).

This policy applies to the processing of personal data in manual and electronic records kept by us in connection with its human resources function as described below. It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the personal data of job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. These are referred to in this policy as relevant individuals.



Definitions

“Personal data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person’s name, identification number, location, online identifier. It can also include pseudonymised data.

“Special categories of personal data” is data which relates to an individual’s health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

“Criminal offence data” is data which relates to an individual’s criminal convictions and offences.

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

Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we will comply with the relevant GDPR procedures for international transferring of personal data (if applicable)

Types of Data Held

We keep several categories of personal data on our employees in order to carry out effective and efficient processes and for effective management of the employment relationship. We keep this data in a personnel file relating to each employee and we also hold the data within our computer systems.

Specifically, we hold the following types of data:

- CV, qualifications, training, references (from former employers), interview data and leaver checklists;
- Pre-employment, surveillance and incident medical data;
- Personal data such as name, address, date of birth, PPS number;
- Contact details (e.g. telephone number, email addresses);
- Banking details, payments/payroll, expenses & pension information;
- Next of kin and emergency contact details;
- Contract of employment;
- Working hours, records of annual/sick leave and records of other absence (e.g. emergency leave, jury leave etc.);
- Medical/ health system information
- Employment and performance related information including (but not limited to) contract, job specification, rate of payment and wider terms and conditions of employment
- Details of formal disciplinary, grievance matters/ investigations;
- Relevant letters and correspondence between Galway Racecourse and you as our employee
- Internal and external training/ CPD undertaken



- Email and internet usage – the Company reserves the right to monitor internet access and e-mails at its discretion to ensure compliance with company policy.
- CCTV

All of the above information is required for our processing activities – for the effective performance of the employment contract, to meet a legal requirement and/ or to satisfy a legitimate business interest.

Employee Rights

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed “Access to Data” below;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- d) the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

Responsibilities

In order to protect the personal data of relevant individuals, which it holds or to which it has access, we have designated employees with specific responsibilities for the processing and controlling of data. We have also appointed employees with responsibility for reviewing and auditing our data protection systems.

Lawful Bases of Processing

We acknowledge that processing may only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis (legitimate business interest/ vital business interest) applies, we may seek to rely on the employee’s consent in order to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Employees will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

Access to Data

As stated above, employees have a right to access the personal data that we hold on them. To exercise this right, employees should make a Data Subject Access Request, to the Company’s Data Protection Officer, currently the Chief Executive. We will comply with the request without delay, and within 1 month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request. In these circumstances, a reasonable charge may be applied.

Data Disclosures

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- a) any employee benefits operated by third parties;



- b) disabled individuals - whether any reasonable adjustments are required to assist them at work;
- c) individuals' health data - to comply with health and safety or occupational health obligations towards the employee;
- d) HR management and administration – for example, to consider how an individual's health affects his or her ability to do their job;
- e) the smooth operation of any employee insurance policies or pension plans;
- f) to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty.

These kinds of disclosures will only be made when strictly necessary for the purpose.

Data Security

All our employees are aware that personal information should be kept in a locked filing cabinet, drawer, or safe.

Employees are aware of their roles and responsibilities when their role involves the processing of data. All employees are instructed to store files or written information of a confidential nature in a secure manner so that they are only accessed by people who have a need and a right to access them and to ensure that screen locks are implemented on all PCs, laptops etc when unattended. No files or written information of a confidential nature are to be left where they can be read by unauthorised people.

Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Employees must always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.

Personal data relating to employees should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received. Where personal data is recorded on any such device it should be protected by:

- a) ensuring that data is recorded on such devices only where absolutely necessary.
- b) using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
- c) ensuring that laptops or USB drives are not left where they can be stolen.

Failure to follow the Company's rules on data security may be dealt with via the Company's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

Third Party Processing

Where we engage third parties to process data on our behalf (now or in the future), we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

International Data Transfers

The Company does not currently transfer personal data to any recipients outside of the EEA.

Requirement to Notify Breaches

Any data breaches would be recorded on a suitable register in a timely manner. Where legally required, we will report a breach to the Data Protection Commission within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.



Training

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data controller/auditors/protection officers for the Company are trained appropriately in their roles under the GDPR.

All employees are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

Records

The Company keeps records of its processing activities including the purpose for the processing and retention periods. These records will be kept up to date so that they reflect current processing activities.

Please read and sign the Employee Privacy Notice and the GDPR (General Data Protection Regulations) Statement for Employees which is at the end of this Employee Handbook.

General Housekeeping

The company considers it important to maintain a clean working environment, and to ensure that the cleanliness and tidiness of the premises is kept to a high standard for the purpose of hygiene, safety and customer satisfaction and company reputation. All employees are required to contribute to maintaining a clean and healthy working environment, thereby showing courtesy to fellow employees and visitors.

All employees are responsible to ensure that all areas that they use are kept clean and tidy to the highest standards possible. These areas include your workstation, reception area, printing and photocopying area, any communal areas you use, etc. All personal belongings i.e. handbags, coats, etc. should be stored away in your desk area / or the locker provided.

Please ensure that your work area is left clear at the end of your workday, with all equipment and documentation put away. Please do not store food in your work area.

Employees are required when using the kitchen to ensure that it is left in a clean, tidy condition. The worktop, table, etc. should be cleaned down before leaving the kitchen. Employees must wash their own cups, spoons and replace them in the cupboard following use. All items that need to be refrigerated must be placed back in the fridge. All food items stored in the fridge must be removed following their expiry date.

Social Events

Normal company policies and procedures apply during all company arranged social events. Inappropriate behaviour including, but not limited to, breach of our Dignity at Work Policy, will be subject to the disciplinary procedure.

Corporate, Social and Environmental Responsibility

The company is committed to being a responsible corporate citizen and supporting community and environmentally-friendly practices.



At intervals throughout the year, we carry out fundraising events and/ or get involved in local/ national charity initiatives regarding which we encourage staff to get involved. We hope you will support any fund-raising events in your area, and join in the spirit of goodwill and fun which they create.

The company aims to support the environment and manage its business activities in a responsible manner. Please familiarise yourself with the waste management activities in your work area, which set out to minimise wastage and maximise recycling. We require all employees to act in a responsible manner in relation to the use of materials and equipment, and welcome all new suggestions to minimise wastage and streamline our business activities.

CCTV Surveillance Policy

The purpose of the CCTV policy is to regulate the use of Closed-Circuit Television (CCTV) and its associated technology in the monitoring of both the internal and external environs of premises of the Company. The Company reserves the right to install CCTV (internally and/ or externally on the premises) for the primary purpose of security of the Company's building and assets.

The policy is intended to highlight the use of CCTV (and to promote awareness amongst users of the building (such as staff, contractors, visitors, etc) of the operation of a security surveillance system in and around the internal and external environs of the premises 24 hours a day.

CCTV will be for the principal purposes of enhancing security of the building and its associated equipment and improving health and safety standards.

The Company has a statutory responsibility for the protection of its people, property and equipment. It is important to provide a sense of security to employees and invitees to its premises.

The primary aim of any CCTV is to deter crime and vandalism and to assist in the protection and safety of employees, property and associated equipment.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and with strict adherence to the General Data Protection Regulation (GDPR) and relevant legislation, as will processing and storage of CCTV data.

The Company will not install/ use CCTV facilities to actively monitor employee conduct in the performance of day to day duties and will not proactively use CCTV to identify conduct that may give rise to disciplinary action. However, if/ where CCTV is installed and if/ where it may assist in providing factual information to assist in an internal investigation (grievance/ disciplinary/ other), the company reserves the right to use CCTV for data processing in this instance on an exceptional basis.

The Company will update/ inform employees of the location of CCTV, any new CCTV installed and any CCTV which is relocated. CCTV is currently located at various locations within and around the site.

The Company Data Controller would periodically provide written material describing the purpose and location of CCTV monitoring and guidelines for its use.

Security

The company require that all security instructions are followed at all times.

It is everyone's responsibility to adhere to security measures which are in place, such as keeping keys secure, not sharing passwords or passcodes, and ensuring that windows and doors are locked.

Employees are required to comply with all security measures laid down by the Company. Any breach of security may, depending upon the circumstances, be treated as gross misconduct. The management reserve the right to search any person and their property including vehicles whilst on, leaving or entering the premises. No item may be removed from the premises without the prior authorisation from the management.



Car Parking

Employees park their cars at their own risk, the company is not responsible in any way. Employees must ensure they lock their car at all times, and do not leave valuables in their vehicle.



Section 11 - Termination of Employment

Termination of Employment

Notice During Probation

During probation, employees are required to give 1 weeks' notice of resignation, in writing, to their manager.

Notice After Probation

All employees, who have successfully completed their probationary period, are required to give notice as per their contract of employment of their intention to terminate their employment, in writing, to their manager.

In the event of termination by the company, you will be entitled to receive the appropriate notice as set out in either your contract of employment or the Minimum Notice and Terms of Employment Act, 1973-2001, whichever is the greater.

Employees who are leaving and who are unable to take their accrued annual leave, will be paid in lieu for those days in their final pay cheque. Employees who have taken more annual leave than they have accrued at the termination date will have their final pay adjusted to recover the excess annual leave taken. The company also reserves the right to deduct any monies owed to it by the employee from the final pay cheque.

The company may, at its sole discretion, give payment in lieu of any required notice period.

The company reserves the right to terminate the employment of an employee immediately with the company and without notice in cases of gross misconduct. The Disciplinary Procedure as outlined in this handbook will be applied.

All employees must ensure they return all company property prior to leaving the company. This includes the following and is not exhaustive:

- Mobile phone
- IT Equipment
- Any documentation issued to the employee including employee handbook, manuals and any other confidential information
- Keys, passwords and other materials

Upon separation, all employees remain covered by their on-going obligations under the confidentiality clauses as outlined in this handbook and as included in their contract of employment (and until any such confidential information comes into the public domain). Intellectual Property: Employees are advised that any intellectual property or system must be returned to the Company upon termination of employment and remains under the ownership of the Company.

The employee must ensure that, before their termination date, they do a handover with their replacement, or another employee, and ensure that another employee is sufficiently trained to carry on the work previously carried out by the departing employee. This may include documenting work or tasks or training the replacement employee.

On resignation, employees must supply, in writing, a resignation letter to the Company. Your P45 details will be updated on ROS accordingly when you leave our employment.

Exit Interviews



When you resign from the Company you may be asked to complete an exit interview form. The purpose is not only to handle administrative details, but also to find out why the employee is leaving and what the company could do to improve the working environment for remaining and future employees. This information helps us to identify areas where we can improve employee relations and/or the arrangement of work and will be treated confidentially.

References

The Company/ your line manager will provide a professional reference for you upon leaving employment, at your request (i.e. not routinely, unless you specifically request same). Only the Chief Executive of the company may issue references for/ on behalf of the Company for former employees.

Retirement

Galway Racecourse is committed to creating a positive and inclusive environment, respecting equality and diversity and encouraging good relations between people of all ages. Galway Racecourse recognises the valuable contribution made by employees of all ages and will work towards eliminating prejudice and discrimination irrespective of age.

Galway Racecourse's normal retirement age is 65. The Company's Retirement Policy complies with statutory legislation as well as best practice. The retirement policy applies to Galway Racecourse employees. This includes those employed on permanent or temporary contracts but, for the avoidance of doubt, does not include visiting workers, students or those workers provided by a third party agency.

Process

This policy applies to all employees.

Employees can indicate a date at which they plan to retire from the service of Galway Racecourse if it is different than the official retirement age (an indicated retirement date).

When an employee formally makes a decision to retire, they are required to give at least their contractual notice. Once an employee has given formal notice to leave, Galway Racecourse is under no obligation to agree withdrawal of their notice.

It is the responsibility of the employee to notify their manager that they are approaching the official retirement date at least six months in advance of that date.

Line managers should have regular conversations with their employees about their expectations, development needs and future plans, for instance through the annual performance and development review.

Working beyond the retirement age:

It is expected that all employees will retire when they reach age 65. However, Galway Racecourse recognises that some employees would like to work beyond the official retirement age. Therefore, Galway Racecourse, in its retirement discussions with individual employees *may*, in consideration of the individual employees' wishes, allowing the individual to work beyond the official retirement age providing:

- The employee undergoes a medical examination by an independent medical advisor, appointed by the Company, to assess their fitness to continue working.
- Provided there is a business need, that the employee is deemed fit to continue working for Galway Racecourse and there are no substantial objective grounds prohibiting the continuation of the employment relationship, then Galway Racecourse *may* offer the employee continued employment, to be reviewed at no less than 12-month intervals thereafter

The employee will be allowed to appeal any decision to decline their request to work beyond the normal retirement age, using the Company's internal grievance procedure and may also be accompanied by a work colleague at any formal retirement related meetings.



Employee Privacy Notice

This Employee Privacy Notice has been created by the Company to demonstrate our intention to comply with the General Data Protection Regulations. We take your privacy very seriously. Therefore, we urge to read this policy very carefully because it contains important information about:

- how and why we collect, store, use and share personal information,
- your rights in relation to your personal information, and
- how to contact us and the relevant supervisory authorities in the event that you have a complaint.

The Company ('we' 'our' 'us') collect, use and are responsible for certain personal information about you. When we do so, we are regulated under the General Data Protection Regulations (GDPR) which apply across the European Union, and we are responsible as 'controller' of that personal information for the purposes of those laws.

As an employee of the Company, you acknowledge that you are aware that photos and videos may be taken during your employment with Galway Race Committee Trust (operating as Galway Racecourse), and used as per the privacy policy during race meets. By signing this Employee Privacy Notice, you are giving your express permission/ consent to the taking of these photos and videos for use on our website page, during promotions etc.

The personal information we collect, and use may include:

Personal information you provide to us such as,

Name; physical address; email address; phone number; date of birth; profile picture, bank account details; PPS no.; and next of kin details.

We keep several categories of data on our employees in order to carry out effective and efficient processes and for effective management of the employment relationship. Specifically, we hold the following types of data:

CV, qualifications, training, references (from former employers), interview data and leaver checklists;
 Pre-employment, surveillance and incidental medical data;
 Personal data such as name, address, date of birth, PPS number;
 Contact details (e.g. telephone number, email addresses);
 Banking details, payments/payroll, expenses & pension information;
 Next of kin and emergency contact details;
 Contract of employment;
 Working hours, records of annual/sick leave and records of other absence (e.g. emergency leave, jury leave etc.);
 Employment and performance related information including (but not limited to) contract, job specification, rate of payment and wider terms and conditions of employment;
 Details of formal disciplinary, grievance matters/ investigations;
 Relevant letters and correspondence between Galway Races and you as our employee;
 Internal and external training/ CPD undertaken;
 Email and internet usage – the Company reserves the right to monitor internet access and e-mails at its discretion to ensure compliance with company policy;
 CCTV.

All of the above information is required for our processing activities – for the effective performance of the employment contract, to meet a legal requirement and/ or to satisfy a legitimate business interest.

Sensitive personal information



Sensitive personal information includes any information which relates to the following:

- your genetic data;
- your biometric data;
- your ethnic origin;
- your political opinions;
- your religious beliefs;
- whether you belong to a trade union;
- your physical or mental health or condition;
- your sexual life, and
- whether you have committed a criminal offence.

We process physical and/ or mental health information, as it may arise during your employment, and as it pertains to your ongoing/ continued safe employment with us. We also process penalty points information as it relates to drivers of company vehicles/ those who drive for work.

Personal information you provide about third parties

If you give us information about another person, you confirm that the other person has appointed you to act on their behalf and agreed that you will:

- consent on their behalf to the processing of their personal data;
- receive any data protection notices on their behalf;
- consent on their behalf to the transfer of their personal data abroad; and
- consent on their behalf to the processing of their sensitive personal data (if/ where applicable).

Monitoring

We may also monitor, intercept, read email and other electronic communications for the purpose of monitoring to establish facts, for compliance with regulatory procedures, to prevent or detect crime, to investigate or detect the unauthorised use of our systems or to ascertain compliance with our practices or procedures. We may also monitor and record communications to check that they are relevant to the business.

We also use CCTV for the protection of employees and third parties' health and safety, and to protect against theft, vandalism and damage to goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime or in the case of a claim, in which case they may be turned over to the police or other appropriate government agency or authority. In addition, CCTV images/ recordings *may* reasonably/ objectively be used as part of an investigation into proceedings of a disciplinary and/ or grievance nature. Further/ full details in relation to our CCTV Policy are located in the Company Handbook, a copy of which will be issued to you.

How we use your personal information

We may process personal data and sensitive personal data concerning you in our manual and computerised filing systems internally and, so far as is reasonably necessary, externally, for the objective basis/ purposes of complying with statutory requirements, meeting our legitimate interests, properly conducting our business, complying with the terms of your employment and for all purposes in connection with your employment with us.

Who your information may be shared with?



We may share your information with:

- Professional advisors;
- Any third-party providing services to us for the benefit of its employees;
- Revenue, Irish Tax and Customs or other authorities;
- Prospective purchasers of all or any part of our business in return for suitable confidentiality undertakings regardless of the country to which the data is to be transferred;
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- Third party processors for the purposes of accounting, tax and regulatory compliance

We will not share your personal information with any other 3rd parties without your express permission/ consent.

How long your personal information will be kept

We will hold your personal information for the following periods:

- General employee data will be held for the duration of employment and then for 7 years after the last day of contractual employment.
- Employee contracts will be held for 7 years after last day of contractual employment.
- Record of employee tax and leave will be held for 6 Years and 3 years respectively from the last day of contractual employment.

These periods are no longer than necessary in each case.

Reasons we can collect and use your personal information

We rely on the following as the lawful basis on which we collect and use your personal information:

- To ensure effective operation of your contract of employment;
- To comply with our legal obligations;
- To protect our vital interests; and
- To protect our legitimate interests.

The legitimate interests relied upon are as follows:

- to ensure the appropriate people are selected for work;
- to ensure the selected employee is on boarded and trained for the work;
- to add the employee's picture and profile to our website; and
- to ensure the employees well-being while at work.

The basis on which we process your sensitive information (i.e. special category, see above) is that:

- processing is necessary to protect the vital interests of the data subject or of another person where the data subject may be incapable of giving consent.

Keeping your information secure

We have appropriate security measures in place to prevent personal and sensitive information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal and sensitive information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner, and are subject to a duty of confidentiality.

We will also use technological and organisation measures to keep your information secure. These measures may include the following examples:



- user account access is controlled by unique username and passwords;
- secure filing cabinets.

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

Your obligations to safeguard personal data of others

In the course of your duties, you may have access to the personal data of other individuals during the course of your employment. You must undertake any mandatory data protection training provided by us, and ensure that you do not inappropriately obtain, retain, amend, use, delete, transmit or compromise the security of the personal data of others.

Failure to comply with your data protection obligations puts at risk the individuals whose personal information is being processed, carries the risk of significant civil and criminal sanctions for you and us and in some circumstances, may amount to a criminal offence for which you are personally liable. Because of the importance of data protection obligations, it may lead to disciplinary action under our procedures, up to and including dismissal, for gross misconduct.

If at any time you have any queries, you should contact us immediately.

Transfers of your information out of the EEA

We will not transfer your personal information outside of the EEA at any time without your consent.

What rights do you have?

Under the General Data Protection Regulation, you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you (please note that we do not currently use any automated decision making or profiling within the Company)
- object, in certain other situations, to our continued processing of your personal information
- otherwise restrict our processing of your personal information, in certain circumstances



- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the Data Protection Commissioner's Office \(DPO\)](#) on individual's rights under the GDPR.

If you would like to exercise any of these rights, please:

- email us at privacy@galwayraces.com
- let us have enough information to identify you
- let us know the information to which your request relates

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to [lodge a complaint](#) with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Ireland is the Data Protection Commissioner who may be contacted at/or telephone: +353761104800.

Changes to the privacy policy

This privacy notice was published on 28/02/2019 and last updated in October 2021.

We may change this privacy notice from time to time and will notify all employees of any changes by email.

Contacting us

Our GDPR responsible person is the Chief Executive Officer.

If you have any questions about this policy or the information, we hold about you, please contact us by e-mail at privacy@galwayraces.com



Employee Acknowledgement 1

GDPR (General Data Protection Regulations) Statement for Employees

The Company is a Data Controller as defined in the General Data Protection Regulations ('GDPR') and is committed to protecting and respecting the personal data it processes in the normal course of its business for individuals who are resident in the European Economic Area (Data Subjects).

The Company will process personal data in a lawful, fair and transparent manner. For personal data to be processed lawfully it must be required by law (e.g. for tax, social security or Company Law purposes), or be part of a contractual arrangement, be required to satisfy a legitimate/ vital business interest, or be held with the consent of the Data Subject.

Personal data processed by the Company will normally include the names, telephone numbers and postal and e-mail addresses of Data Subjects with additional information for officers and employees of the Company such as bank account details for payment of wages, tax and social security information, and employment history.

The personal data of Data Subjects other than data held with ongoing consent will not be retained for longer than is necessary. The Company will make checks at least annually to decide what data should be deleted.

In the event that the Company outsources any processing of the personal data, it will ensure that the Data Processor it appoints agrees to abide by the requirements of GDPR. No personal data held by the Company will be processed outside the European Economic Area without the consent of Data Subjects.

The Company accepts that the personal data which it holds should be accurate, kept up to date and processed in such a manner that ensures appropriate security. In the event of the Company becoming aware of any breach of data security it will notify the relevant supervisory authority as far as possible within the time limit specified in the GDPR.

Data Subjects have the right to request the Company for access to their personal data. They also have the right where appropriate to request rectification, erasure, restriction on processing and data portability. They may also in certain circumstances have the right to object to processing. Where processing is based on consent Data Subjects may withdraw their consent at any time without affecting the lawfulness of prior consent.

Any requests for information on personal data should be made in writing and addressed to the Chief Executive via email to privacy@galwayraces.com. Any complaints about the manner in which the Company handles requests should be addressed to The Data Protection Commission, Canal House, Station Road, Portllington, R32 AP23, Co. Laois.

The Company reserves the right to make such updates as may be appropriate or required by law to this Data Privacy Statement.

I have read and understand the Company's Data Protection and Personnel Information policy and the Employee Privacy Notice as contained/ outlined within this Employee Handbook. I have also read and understand this GDPR (General Data Protection Regulations) Statement for Employees

I consent to my data being processed, as outlined, by Galway Racecourse.

____/____/____

Employee Signature
Employee Acknowledgement 2

DATE



Employee Handbook Acknowledgement Form

This Employee Handbook and the Company Policies & Procedures therein have been prepared for my information and understanding of my employment with Galway Race Trust Committee (operating as Galway Racecourse).

I, _____, have received a copy of the Employee Handbook associated with my employment with Galway Racecourse.

I have familiarised myself with the contents of the Employee Handbook. By my signature below I acknowledge, understand, accept and agree to comply with the information contained in the Employee Handbook. I further acknowledge that by signing below I agree to comply and to be subject to the company policies and procedures within the Employee Handbook.

I understand and accept that the Employee Handbook is not intended to cover every situation, which may arise during my employment, but is a helpful guide to the policies and procedures of Galway Racecourse.

I understand and accept that Galway Racecourse may issue further guidance or make amendments to the Employee Handbook and to the Policies & Procedures therein. Should this occur, I will be notified of the changes.

I further understand that the Employee Handbook should be read and reviewed in conjunction with my contract/ statement of my terms of employment with Galway Racecourse, and that it forms part of my terms and conditions of employment with the Company.

___/___/___

Employee Signature

DATE