


<p>Queens Sports Club</p>	
<p>Whistleblowing Policy</p>	<p>Issue: 1</p> <p>Issue Date: March 2023</p> <p>Review Date:</p> <p>Page: 1</p> <p>Size: Pages 6</p>

Whistleblowing Policy Queens Sports Club (the club)

The club is committed to being open, honest and accountable. It encourages a free and open culture in its dealings between the committee and those working with the club, both employees and members.

This policy aims to help the committee and employees/members to raise any serious concerns they may have about colleagues or their employer with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result.

It is written in the context of the Public Interest Disclosure Act 1998 which protects employees/members who 'blow the whistle' on malpractices within their organisation.

What types of concerns?

The policy is intended to deal with serious or sensitive concerns about wrongdoings such as the following:

- A criminal offence
- A failure to comply with any legal obligation
- A failure in the protection of children or vulnerable adults
- A miscarriage of justice
- A health and safety risk to an individual
- Damage to the environment
- Any activities or actions which may be to the detriment of the club.
- Or concealment of the above.

It is not necessary for individuals who raise the concern to prove the wrongdoing that is alleged to have occurred or is likely to occur.

However, if an individual knowingly or maliciously makes an untrue allegation (e.g.: in order to cause disruption with the club), the club will take appropriate disciplinary action against them. It may constitute gross misconduct.

Individuals should note that they will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence.

This policy does not deal with any complaints staff may have about their employment. This should be dealt with through the club's Grievance Procedure.

How to raise a concern in the club

The officer designated to handle whistleblowing concerns is Club Secretary and shall be known as the Whistleblowing Officer.

Individuals should in most cases, first report their concern to Club Secretary, who is expected to respond to that matter. If the relevant person cannot deal with the matter, he or she will refer the concern to the Whistleblowing Officer.

Dependent on the seriousness and sensitivity of the matter, and who is suspected of the wrongdoing, the individual can, if necessary, report directly to the Whistleblowing Officer. If the matter concerns the Whistleblowing Officer, it should be raised with the committee.

Individuals are encouraged to raise their concerns in writing where possible, setting out the background and history of their concerns (giving names, dates and places where possible) and indicating the reasons for their concerns.

Employees may wish to seek the assistance of their trade union representative before raising the concern. The trade union representative may, where the employee so desires, raise the concern on behalf of the employee. Employees may also invite a trade union representative or colleague to be present during any meetings or interviews about the concerns they have raised.

Protecting the individual raising the concern

If an individual raises a concern which they believe to be true, the club will take appropriate action to protect the individual from any harassment, victimisation or bullying. Employees who raise a genuine concern under this policy will not be at risk of losing their job, nor will it influence any unrelated disciplinary action or redundancy procedures.

The matter will be treated confidentially if the individual requests it and their name or position will be not be revealed without their permission unless the club has to do so by law. If in other circumstances the concern cannot be resolved without revealing the individual's identity, the Whistleblowing Officer will discuss with the individual whether and how to proceed.

Concerns raised anonymously tend to be far less effective but the Whistleblowing Officer will decide whether or not to consider the matter taking into account:

- The seriousness of the matter;
- Whether the concern is believable;
- Whether an investigation can be carried out based on the information provided.

How the club will deal with the concern

How the concern will be dealt with, will depend on what it involves. It is likely that further enquiries and/or investigation will be necessary. The concern may be investigated by the club's Whistleblowing Officer, the committee, through the disciplinary process or it may be referred to the police, other agencies such as Social Services, an external auditor or an independent investigator.

It may be necessary for the individual to give evidence in criminal or disciplinary proceedings.

The club will give the individual feedback on the progress and outcome of any investigation wherever possible.

If the suspicions are not confirmed by an investigation, the matter will be closed. Staff will not be treated or regarded any differently for raising the concern, and their confidentiality will continue to be protected.

General Guidance

What is Whistleblowing?

Whistleblowing, or public interest disclosure, is when a member of staff/member reports a concern about the improper actions or omissions of their colleagues or their employer which may cause harm to others or to the organisation. Obvious examples of such improper actions include theft, fraud, abuse, breaches of health & safety.

The disclosure should be made 'in good faith'. In other words the disclosure must be made out of real concern about wrongdoing. Knowingly and maliciously making false accusations for ulterior motives is not whistleblowing. The whistleblower should reasonably believe the information and allegation is substantially true, even if the information later turns out to have been incorrect.

Whistleblowing is not the same as making a complaint or raising a grievance, where the individual is saying that they have personally been poorly treated. A whistle-blower is usually not directly or personally affected by the concern and therefore rarely has a direct personal interest in the outcome of any investigation into their concerns.

The whistle-blower raises the concern so that others can address it. Examples of concern may include:

- An employee or member defrauding the charity or anyone associated with the charity;
- The physical or emotional abuse of children, young people, vulnerable adults or the elderly;
- Anyone making inappropriate use of the club's resource (e.g.: for their own personal benefit);
- Faulty machinery that puts at risk the safety of employees/members or anyone associated with the club.

Good Practice

For effective risk management, employees/members need to be confident that they can raise matters of concern without suffering any detriment. Not dealing with problems early could have a devastating effect on organisations with costly fines, compensation, higher insurance premiums, damaged reputation, regulatory investigation, lost jobs, and even lost lives. Whistleblowing can be an early warning system for employers and an effective policy can provide a clear framework for action for employees and employers alike.

Following its public consultation on whistleblowing, the UK Financial Services Authority (FSA) found that:

'A whistleblowing policy will improve the trust and confidence among workers by creating what one respondent called a "culture of honesty and openness" by encouraging workers to report internally. This was seen as "good for the morale of workers", giving them confidence to come forward with concerns. Senior managers will be the first to know of any issues that they may need to address. These can be dealt with internally. This also means that the costs of investigating any problems, such as fraud, are reduced as problems can be caught quickly.'

If employees/members voice concerns within the organisation rather than being forced to go to an external body, employers can often tackle a problem before it becomes a crisis, thus helping to avoid potentially damaging media coverage, regulatory sanctions and/or costly compensation payments. A

whistleblowing policy can provide a clear framework for constructive problem solving in a reasonable, appropriate and controllable way.

Employees/members should not be expected to prove their case should they have a concern about malpractice. Therefore, an organisation's policy on - and response to - whistleblowing should be different from its policy on and response to a grievance.

The main points to consider within a whistleblowing policy or approach to whistleblowing at the club:

- Involve employees/members by consulting with them, either through staff groups, focus groups of members or individually, before the introducing the policy;
- Discuss the types of risk your organisation may face with your employees/members;
- Be clear about what conduct is unacceptable and about the standards expected of your employees/members;
- Encourage employees/members to share their concerns internally and in confidence – they do not need to have proof or need to investigate the matter themselves;
- Be clear that concerned employees/member will be supported and protected from reprisals;
- Explain that a whistle-blower is a witness, not a complainant;
- Deal with wrongdoing seriously and effectively;
- Train staff, committee members on how to deal with whistleblowing;
- If employees/members feel uncomfortable raising their concern with their Club Secretary, explain that they should then raise it at a senior level such as to a member of the committee
- Emphasise to committee members/employees/members that victimisation is a disciplinary offence as is knowingly raising malicious untrue allegations;
- Offer confidentiality to any employees/member who asks for it but be clear that there may be circumstances when their identity might have to be revealed such as when you are ordered by court;
- Report back to employees/members about the progress and outcome of any enquiry or action taken;
- Be prepared to explain how you have handled the concern;
- Under no circumstances try to suppress evidence of malpractice.

Further Information

Protect (Whistleblowing Advice) Limited

This charity is an independent authority on public interest and whistleblowing. It promotes compliance with the law and good practice. They also aim to influence public policy and legislation.
<https://protect-advice.org.uk/>

ACAS

The Arbitration Conciliation & Advisory Service website provides guidance on whistle-blowing for both employers and employees www.acas.org.uk/index.aspx?articleid=1919

Direct.Gov

Information on whistleblowing can be accessed through the government websites.
www.gov.uk/whistleblowing/overview

The Chartered Institute of Personnel and Development (CIPD)

CIPD is the professional body for those involved in the management and development of people. They have a factsheet on whistleblowing. www.cipd.co.uk/subjects/empreltns/whistleblw/whistle.ht

The Committee

Queens Sports Club – March 2023