

### Introduction

Confidential reporting, or whistleblowing, is the disclosure or communication of information about possible malpractice by individuals or organisations. Disclosure can be either internal within the organisation or external to an outside authority.

This confidential reporting code is intended to enable employees to disclose information about malpractice internally and to provide employees with protection from subsequent victimisation, discrimination or disadvantage. This will assist in detecting and deterring malpractice and, by demonstrating Ball Hockey UK's accountability, maintain public confidence and our good reputation.

The term employees is used throughout this policy. Although Ball Hockey UK does not direct employ anyone this term will cover all club players, club officials, referees and anyone associated with our member clubs.

### **Purpose**

Club officials, players or volunteers are often the first to realise that there may be evidence of malpractice. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the club. They may also fear harassment or victimisation.

In line with Ball Hockey UK's commitment to high standards of openness, integrity and accountability, BHUK expects anyone who has a reasonable belief that malpractice is taking place to come forward and voice those concerns internally. This may be an awareness of suspected irregularity, wrongdoing or a failure of standards. This code provides the means for employees to make such disclosures.

An employee's concerns about malpractice may include a reasonable belief that one or more of the following has occurred or is likely to occur:

- Conduct which is an offence or a breach of law,
- Miscarriages of justice,
- Health and safety risks, including risks to the public,
- Damage to the environment,
- The unauthorised use of public funds,
- Fraud and corruption,
- Sexual or Physical,
- Other unethical conduct.

Under this code disclosures about possible malpractice should be made to complainBHUK@gmail.com.

It is recognised that most cases will have to proceed on a confidential basis.

It is in the interests of all parties that disclosures are dealt with properly, quickly and discreetly. The overriding consideration for BHUK and the one making the disclosure is that it would be in the public interest for any malpractice found to be corrected and, where appropriate, sanctions applied.

The code provides for a procedure to make disclosures of irregularity or wrongdoing without fear of adverse treatment as a result. BHUK will not tolerate any harassment or victimisation of employees making disclosures (including informal pressures) and will take action to protect anyone making a disclosure in good faith.

The code addresses major concerns that fall outside the scope of other procedures and where the interests of others or of BHUK are at risk. It has been developed within the following legislative and policy framework:

It takes into account the requirements of the Public Interest Disclosure Act 1998.

It is complementary to the Code of Conduct which makes clear the standards of propriety and good practice expected of employees. It is also complementary to the Discipline & Grievance At Work Procedure.

Together they form a framework which allows employees to be disciplined, to seek personal redress, to raise personal complaint and to disclose malpractice where appropriate.

The code is in addition to the complaints procedures and other reporting procedures, for example child protection procedures.

## Scope

This code applies to all involved with BHUK. It is also applicable to:

- contractors working for BHUK, for example, agency staff, builders, drivers.
- suppliers and those providing services under a contract with BHUK in their own premises.

# **Procedure for Making A Disclosure**

#### Introduction

This code provides you with a procedure for making disclosures internally about suspected wrongdoing, irregularity or a failure of standards. Its aims are:

• To encourage you to feel confident in raising serious concerns and to question and act upon concerns about possible malpractice.

- To provide a means for you to disclose those concerns and receive feedback on any action taken.
- To ensure that you receive a response to your concerns and that you are aware of how to pursue them further if you are not satisfied.
- To reassure you that you will be protected from possible reprisals or victimisation and from subsequent discrimination or disadvantage.

Any serious concerns that you have about an aspect of service provision or conduct of others acting on behalf of BHUK can be reported under this code. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe that BHUK subscribes to.
- is against BHUK's policies.
- falls below established standards of practice.
- amounts to improper conduct.

### Confidentiality

All disclosures will be treated in confidence and wherever possible, every effort will be made not to reveal your identity. However, you may need to come forward as a witness and you will be given every support at that time.

### **Anonymous Disclosures**

You should put your name to your disclosure whenever possible. Disclosures made anonymously will still be considered at the discretion of BHUK. However, it is helpful to have your name in case further information is required.

In exercising its discretion, BHUK will take into account:

- the seriousness of the issues raised.
- the credibility of the disclosure.
- the likelihood of confirming what is alleged from attributable sources.

#### **Untrue Disclosures**

If you make a disclosure in good faith that you reasonably believe is in the public interest, but it is not confirmed by the investigation, no action will be taken against you. If however, your allegation is frivolous, malicious or for personal gain, you may be subject to disciplinary action.

#### What You Should Do To Raise A Concern

As a first step, you should normally raise your concerns with <a href="mailto:complainBHUK@gmail.com">complainBHUK@gmail.com</a>. The earlier you express the concern, the easier it is to take action. You should provide:

- details of your concerns, including the nature, dates and location of any relevant incidents.
- reasons why you feel concerned about the situation.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

You may wish to consider discussing your concern first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns..

You may invite someone you trust or other representative to be present during any meetings or interviews in connection with the concerns you have raised.

The amount of contact between you and the person considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, BHUK will seek further information from you.

### **Action Taken By Ball Hockey UK**

BHUK will respond to your disclosure. Where appropriate, the matters raised may be:

- a) investigated by management, by internal audit, or through the disciplinary process;
- b) referred to the Police;
- c) be the subject of an inquiry.

In order to protect individuals and those accused of possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The over-riding principle BHUK will have in mind is the public interest. Disclosures for which there are other specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any action investigation is conducted.

Within 10 working days of a concern being raised, you will receive a response:

- a) acknowledging that the concern has been received;
- b) telling you whether any initial enquiries have been made;
- c) indicating how the matter is going to be dealt with;
- d) giving an estimate of how long it will take to provide a final response;
- e) supplying you with information on support mechanisms;
- f) telling you why if there is to be no further investigation.

BHUK will take steps to minimise any difficulties you may experience as a result of making a disclosure. For instance, if you are required to give evidence in criminal or disciplinary proceedings BHUK will arrange for you to receive advice about the procedure.

You will need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will be informed of the outcomes of any investigation.

## How the Matter Can Be Taken Further

This code is intended to provide you with a route within Ball Hockey UK to make disclosures of malpractice. BHUK hopes you will be satisfied with any action taken. If you are not, and you believe the information you have disclosed is substantially true you should contact your local Citizens Advice Bureau or if necessary, the police.

If you do take the matter outside of BHUK, you should ensure that you do not disclose confidential information. Check with the person dealing with your disclosure within BHUK before divulging any information.

# Monitoring & Review

We are committed to reviewing our policies and good practice every three years or sooner if there are any changes in legislation or government guidance or as a result of any other significant change or event.

Policy Owner	Ball Hockey UK
Policy Title	Whistleblowing Policy
BHUK Contact Email	contactBHUK@gmail.com
BHUK Website	www.ballhockeyuk.com
BHUK President Name	Rob Clayton
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