

Whistleblowing Policy

Purpose

The purpose of this policy is to explain how employees can make a whistleblowing disclosure and what steps Sport Structures will take if we receive a disclosure. We are committed to the highest possible standards of openness, transparency and accountability. We encourage employees to use this policy to disclose anything they think counts as whistleblowing.

Scope

This policy applies to all employees, including associates.

Roles and responsibilities

At Sport Structures;

- The Chief Executive Officer is responsible for the policy and appointing a relevant manager to manage the Whistleblowing process
- Managers (Directors of departments) are responsible for receiving whistleblowing disclosures and for following the procedures outlined in this policy
- All staff and associates are responsible for following this policy when they spot wrongdoing that merits a disclosure

What is whistleblowing?

Whistleblowing refers to the disclosure of malpractice, as well as illegal acts or omissions at work. Whistleblowing is when an employee reports certain types of wrongdoing they've seen at work. To count as whistleblowing, the employee must have a reasonable belief that what they are disclosing is one or more of the following:

- a criminal offence
- a miscarriage of justice
- a risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment of any of the above

- anything that may damage the delivery of services or reputation of the company

Employees don't need proof that anything listed above has happened, is happening or will happen. A reasonable belief is enough. Employees should not investigate any wrongdoing. The company will conduct any necessary investigations.

Personal grievances, such as bullying, harassment and discrimination do not count as whistleblowing. The company grievance policy should be followed for these issues.

Protections for Whistleblowers

The term 'Whistleblower' is used to describe an individual who raises a concern. Whistleblowers are protected by law. They can't suffer a detriment or lose their job because they made a disclosure.

Sport Structures wants to make clear that no employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training will not be affected for any employee that whistle blows.

Disciplinary procedures will only be used if:

- anyone victimises a whistleblower
- a whistleblowing disclosure is maliciously false
- anyone tries to cover up wrongdoing, or remains silent on issues they know are wrong

Whistleblowing procedure

Step 1: Disclosing a concern

Employees should raise an issue they think counts as whistleblowing to a manager or to a person in the company who they are comfortable to speak to. If an employee is concerned that a manager is involved in the wrongdoing, they should take the matter straight to the Chief Executive Officer.

Disclosures can be made verbally or in writing. The disclosure may wish to consider:

- Full details of concerns
- Any evidence to support the concerns

The company will acknowledge receipt of the disclosure within 5 working days.

Employees should be reassured that their disclosure will be kept confidential and they will not be disciplined or disadvantaged in any way for raising it. Anonymous disclosures cannot be considered.

Step 2: Investigating the disclosure

Once a disclosure has been received the Chief Executive Officer will allocate a manager to investigate the disclosure. This may involve looking at:

- Company policy
- Legislation
- accident records and reports
- financial records
- emails and letters
- CCTV footage, if applicable
- Any other evidence that maybe relevant

The manager investigating may also need to meet with the whistleblower and others connected with the issue. Employees have the right to be accompanied to such meetings by a work colleague or employee representative. Minutes of these meetings will be shared with everyone who attended.

The Chief Executive Officer will be informed that an investigation is being carried out with any details of who is involved or what the issue is at this stage.

The person implicated will only be involved if the Chief Executive Officer feels this would be appropriate.

The allocated manager will keep the whistleblower updated on the progress of an investigation.

Step 3: Deciding the outcome

Once the investigation has finished, the manager will make recommendation to the board of Directors. The whistle bower will be informed of the recommendation and the outcome.

Further action may be taken. For example, we may need to:

- involve external bodies, such as [prescribed bodies](#) or the police
- change a process
- take disciplinary action against those found to be responsible for the wrongdoing

Step 4: If the whistleblower is unhappy with the outcome

If the whistleblower is concerned that their disclosure has not been properly investigated, they should inform the Chief Executive Officer. They will then use the appeals process. If after all the steps outlined above have been completed and a whistleblower reasonably believes the appropriate action has not been taken, they should report the matter to the correct [prescribed body](#).