



Whistleblowing Policy and Procedures

Responsible for review of policy	Responsible for review of procedures
Chairman of Audit & Risk	Director of Finance, Business Operations & Governance

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Policy

Archery GB is committed to the highest standards of transparency, probity, integrity, and accountability and wants to encourage a culture of openness to protect its members, volunteers, employees, and service providers, to uphold the reputation of the sport and to maintain the public's confidence.

Archery GB therefore encourages all individuals to raise any concerns about improper conduct within Archery GB or by its members or within its affiliated Clubs, County, Regions, or Home Nations.

Archery GB recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged poor practice. If an individual believes what they are saying to be true, they should have nothing to fear because in reporting their concern they will be doing their duty to Archery GB, its affiliated Clubs, County, Regions, or Home Nations and/or to those whom Archery GB provide a service.

Archery GB will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect individuals when they raise a concern in good faith.

Any investigation into allegations of alleged poor practice will not influence or be influenced by any disciplinary procedures that already affect individuals.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority you should not agree to remain silent.

This policy does not replace other policies and procedures such as the disciplinary and grievance policy, anti-bullying, or safeguarding policies.

This policy is intended to ensure that Archery GB complies with its duty under the Public Interest Disclosure Act 1998.

1. Scope

This policy applies to all Archery GB members, volunteers, employees, affiliated organisations, athletes on the talent pathway or elite performance programme, associates, and contractors.

This policy applies to, but is not limited to, allegations about any of the following:

- Breaches of Archery GB rules or regulations, code of conduct or policies
- Breaches of safeguarding and Protecting Children, or Adults at Risk Policies
- Betting, corrupt conduct, inside-information, and match-fixing
- Serious Health and Safety risks e.g., coercing an athlete to train against medical advice or conducting an unsafe practice
- Risk of damage or actual damage to the environment
- A miscarriage of justice
- Conduct which is a criminal offence or breach of the law
- Complicity in any of the above matters including the deliberate concealment of any of the above

- The unauthorised use of public funds
- Fraud and corruption
- Abuse of authority; or
- Any other unethical conduct

As a whistleblower you are protected by law, you should not be treated unfairly, lose your job, be subjected to victimisation, discrimination, or harassment because you 'blow the whistle'.

Archery GB encourages individuals to raise their concerns under this procedure in the first instance. If you are not sure whether to raise a concern, discuss the issue with your Manager, Club or County / Regional Chair or with the Archery GB Director of Governance. If it is not possible to speak to any of the above, due to the nature of the concern, speak with the Chief Executive, to the Chair of the Board of Directors or to the Senior Independent Director.

This policy does not replace other policies and procedures such as the disciplinary and grievance policy, anti-bullying or safeguarding policies and specifically laid down statutory reporting policies.

2. Confidentiality

Archery GB will do its best to protect the identity of the whistleblower when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by the whistleblower may be required as part of the evidence. They will be given prior notice of this and a chance to discuss the consequences.

3. Raising an Allegation

All allegations should be raised to:

- Director of Finance, Business Operations and Governance at Archery GB
- If not appropriate due to the nature of the concern to the Archery GB Chief Executive or Chair of the Archery GB Board

Concerns may be made verbally or in writing. The individual should set out the background and history of the concern, giving names, dates, and places where possible and the reason why they are particularly concerned about the situation. The earlier the individual expresses concern, the easier it is for someone to act.

Although the whistleblower is not expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for their concern.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure or by an external agency, the right to be accompanied will at that stage be in accordance with the relevant procedure or the rules of the relevant agency.

4. Anonymous Allegations

This policy encourages the whistle blower to put their name to their allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the official receiving the allegation.

In exercising the discretion, the factors to be considered would include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources or factual records

5. Untrue Allegations

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, it is established that they have made malicious or frivolous allegations, or for personal gain, disciplinary action may be taken against them. In such cases, Archery GB disciplinary procedure will apply.

6. Response to Allegation received by Archery GB

To protect individuals, it is likely that the Director of Finance, Business Operations and Governance will record details of the allegation gathering as much information as possible, including:

- The record of the allegation
- The acknowledgement of the allegation
- Any documents supplied by the whistleblower

They will ask the whistleblower for their preferred means of communication and contact details and use these for all communications with the whistleblower to preserve confidentiality.

7. Timescales

Receipt of the individual's concern will be acknowledged within two working days and, within five working days of the concern being received, Archery GB will communicate with them:

- Indicating how the matter will be dealt with and whom will be involved
- Giving an estimate of how long it will take to provide a final response
- Telling them whether any initial enquiries have been made
- Telling them whether further investigations will take place, and if not, why not

Examples of the course of action depending on their nature:

- **Criminal offence or financial irregularity** – will be reported to the CEO of Archery GB, who will liaise with the Chair and Board of directors as necessary, and a decision will be made as to whether to inform the police
- **Harm to children or adults at risk** – the matter will immediately be referred to the National Lead Safeguarding Officer who will deal with the matter in accordance with Archery GB Safeguarding and / or Adults at Risk Policy

- **Concerns about a member of staff** – the matter will be referred to the HR Lead or CEO and will be dealt with in accordance with staff disciplinary procedures
- **Anti-Doping rule violation** – the information will be reported to UK Anti-Doping investigators and the Anti-Doping Lead Officer

For any **other allegation**, if it falls to be considered under an existing Archery GB policy, it will be dealt with in accordance with that policy. In any other circumstances, the Director of Finance, Business Operations and Governance, along with the CEO, will decide the appropriate procedure.

The amount of contact between the people considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from the whistleblower as part of the investigation process.

When any meeting is arranged, the whistleblower has the right, if they so wish, to be accompanied by a friend or a person of their choice who is not involved in the matter to which the concern relates. However, if the matter is subsequently dealt with through another procedure or by an external agency, the right to be accompanied will, at that stage, be in accordance with the relevant procedure or the rules of the relevant agency.

Archery GB will take steps to minimise any difficulties which individuals may experience because of raising a concern. For instance, if the whistle blower is required to give evidence at disciplinary proceedings, Archery GB will advise them about the procedure.

Archery GB accepts that the whistleblower needs to be assured that the matter has been properly addressed. Subject to legal constraints, they will receive information about the outcomes of any investigations, and the action that is to be taken against those whose actions caused them concern. Also, if appropriate, what policy changes are to be made to minimise the possibility of a similar concern being raised in the future.

8. Support for Whistleblowers

Archery GB will take steps to minimise any difficulties which may be experienced because of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings, Archery GB will arrange for them to receive advice about the procedure and on the available support mechanisms.

The charity Protect supports whistleblowers who call their advice line or complete their online form. More details about this service can be found at www.protect-advice.org.uk.

Archery GB accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

9. Responsibility for the Procedure

The Director of Finance, Business Operations and Governance and the CEO have overall responsibility for the operation of this policy and for determining the administrative processes to be followed and the format of the records to be kept.

A confidential Register kept by the Governance Officer will record the following details:

- The name and status (e.g., employee/member/volunteer) of the whistle blower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will only be available for inspection by the Welfare and Governance department, the CEO, and the Board of Archery GB.

10. Further Information

For your information, some regulatory statutory bodies are listed below:

(<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>)

These Regulatory statutory bodies have individual policies and procedures for handling concerns and complaints. Many of their websites contain guidance on issues that you may face which may be helpful in your initial deliberations on whether to make a disclosure.

The Information Commissioner

In relation to compliance with the requirement of legislation relating to data protection and freedom of information. Email: casework@ico.gsi.gov.uk Website: www.ico.gov.uk

The Health and Safety Executive

This relates to the health and safety of individuals at work or the health and safety of the public that is work-related, in connection with those industries and work activities for which HSE is the enforcing authority. Online form: <http://www.hse.gov.uk/contact/raising-your-concern.htm>
Website: www.hse.gov.uk

The National Society for the Prevention of Cruelty to Children (NSPCC)

Matters relating to child welfare and protection.

Email: help@nspcc.org.uk Website: www.nspcc.org.uk

Care Quality Commission

Matters relating to the provision of health and social care.

Website: www.cqc.org.uk

General Medical Council

Matters relating to the registration and fitness to practise of a member of the medical profession.

Website: www.gmc-uk.org

Health and Care Professions Council

Matters relating to the registration and fitness to practise of health and care professional (e.g., physiotherapy).

Website: www.hpc-uk.org

Protect

Protect is the UK's whistleblowing charity. They aim to stop harm by encouraging safe whistleblowing. Their free, confidential advice line supports more than 3,000 whistle blowers each year who have seen malpractice, risk, or wrongdoing in the workplace.

Website: www.protect-advice.org.uk

Contact Details:

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