WHISTLEBLOWING POLICY

# **GENERAL PRINCIPLES**

## Goalball UK aspires to conduct all of its affairs with the highest degree of probity and therefore encourages all directors, employees and other stakeholders to disclose any serious concerns regarding the activities of their fellows. Unless the contrary is proved, all such disclosures must be regarded as being made in good faith and informants protected from victimisation or any form of reprisal.

## In some circumstances, it may be possible to raise concerns through the Grievance Procedures, but this may not be appropriate, e.g., where complaints involve matters of confidentiality or criminal wrongdoing.

## It is important to the company that any fraud or other misconduct perpetrated by directors, employees or other persons occupying positions of trust is reported and properly dealt with. This policy statement sets out the ways in which individuals may raise any concerns that they have and how those concerns will be dealt with.

## Background

## The Public Interest Disclosure Act 1998 provides statutory protection for workers (which is widely interpreted) raising legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in good faith by a worker who has a reasonable belief that:

### A criminal offence has been, is being or is likely to be committed.

### A miscarriage of justice has occurred, is occurring or is likely to occur.

### The health and safety of an individual has been, is being or is likely to be endangered.

### The environment has been, is being or is likely to be damaged.

### A person has failed, is failing or is likely to fail to comply with any legal obligation

### Deliberate concealment of any of the above is being, has been, or is likely to be, committed.

It is not necessary for the informant to have proof that such an act is being, has been, or is likely to be, committed. A reasonable belief is sufficient and he/she is not under a duty to investigate the matter before reporting it. The initiation of investigations is a task for Goalball UK.

## Employees are afforded similar protection in relation to protected disclosures under the Employment Rights Act 1996. Employees should also be aware that disclosures to individuals or organisations external to Goalball UK will only be protected in limited circumstances.

## Any employee who makes such a protected disclosure has the right not to be dismissed, or subjected to victimisation for doing so. Goalball UK extends these protections to volunteers and other stakeholders and wishes to encourage them to avail themselves of these procedures whenever they think it necessary. Anyone who is unsure whether to raise a concern should discuss the matter with their line manager, the CEO or the Chair of the Board.

## Principles

### Everyone should be aware of the importance of preventing and eliminating wrong doing at work. They should be watchful for illegal or unethical conduct and report anything of that nature of which they become aware. Any issue raised under this procedure will be investigated promptly and thoroughly. Where possible, concerns should not be raised on any anonymous basis as this may inhibit any subsequent investigation. As far as is reasonably practical and where appropriate, Goalball UK will endeavour to keep matters confidential and, where appropriate, will report the outcome back to the person raising the issue. If misconduct is discovered as a result of any investigation, the company will take disciplinary proceedings in addition to any consequences that may follow under the general law.

### Making a false allegation in bad faith may be treated as a disciplinary offence. Victimising a person for making a protected disclosure will also be treated as a disciplinary offence. Similarly, instructing someone to cover up wrongdoing is a disciplinary offence. Anyone confronted with a request not to pursue a concern should report the matter to the CEO or Chair of the Board as soon as possible.

## Procedures

### Wherever practicable, concerns should in the first instance be communicated to an informant’s line manager who should investigate the matter personally or immediately pass it on to someone in a more senior position. If the concerns are raised by a volunteer or stakeholder, they should in the first instance be communicated to the CEO. The investigation will be conducted in accordance with the principles set out above and may involve the informant and other individuals being required to provide written statements or to comment on written statements provided by others.

### The person carrying out an investigation should report his/her findings to the CEO or Chair of the Board who should then consider whether to report the matter to any appropriate external authority. Additionally, they may decide to initiate internal disciplinary proceedings. On the conclusion of any investigation, the informant should be advised as to the outcome as far as is possible. If no action is to be taken, the reason for this should be explained if possible.

### If, having followed the above procedures, the informant believes that appropriate action has not been taken, he/she may report the matter to the proper outside authority.

### The legislation protecting individuals who make a protected disclosure applies not only to fellow employees but also to any other person undertaking to do work or perform services for the employer.