

WHISTLEBLOWING POLICY

1. INTRODUCTION

- 1.1 British Canoeing encourages a free and open culture across the whole of the sport. All organisations face the risk of things going wrong and/or of wrongdoing occurring. British Canoeing recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisation's success ensured.
- 1.2 This Policy provides a mechanism for serious concerns of wrongdoing or unethical conduct within British Canoeing to be reported. This policy applies to all those who come into contact with British Canoeing including but not limited to employees, members, athletes, coaches, EIS staff, volunteers and consultants who may feel that they need to raise certain issues relating to the organisation with someone in confidence.
- 1.3 Subject to Clause 3.9, anyone approaching British Canoeing, in good faith, with information regarding matters of wrongdoing, such as fraud, misappropriation, bad practice in child protection, coaching or water safety, discrimination or breach of codes of conduct, will not be subjected to any form of detriment or disadvantage as a result of having raised their concerns.
- 1.4 This policy does not form part of any contract of employment and it may be amended at any time.

2. WHAT IS WHISTLEBLOWING

- 2.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing, and generally concerns a breach of a legal, statutory or regulatory requirement or some unethical or immoral behaviour. For example:
 - Breach of Legal Obligations – Health and Safety Legislation
 - Breach of British Canoeing Policies and Codes of Conduct
 - General malpractice or unethical conduct
 - Gross misconduct
 - Financial irregularity
- 2.2 Certain cases of whistleblowing are covered by the law under the Public Interest Disclosure Act 1998:

- a criminal offence has been committed, is being committed, or is likely to be committed;
- a person has failed, is failing, or is likely to fail to comply with any legal obligation to which he or she is subject;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- the health and safety of any individual has been, is being, or is likely to be endangered;
- the environment has been, is being, or is likely to be damaged;
- Information tending to show any of the above has been, is being, or is likely to be deliberately concealed.

3. PROCESS

- 3.1 If anyone wishes to raise or discuss any issues which might fall into one of the categories listed above in clause (2.1 or 2.2), they should contact the Head of Governance and Compliance or the Chief Executive Officer. A dedicated email has also been established whistleblowing@britishcanoeing.org.uk to express any concerns.
- 3.2 The person who receives the disclosure will, in so far as is possible, treat the matter in confidence. In some rare exceptional circumstances confidence may need to be breached for example, if there is a potential threat to a child or vulnerable adult.
- 3.3 Individuals are encouraged to put their name to any disclosure. Allegations raised anonymously may be investigated depending on the seriousness of the issues raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.
- 3.4 The disclosure will initially be considered by the Head of Governance and Compliance and/or the Chief Executive Officer. Issues relating to Safeguarding will be dealt with in accordance with British Canoeing Safeguarding Policies unless the disclosure relates to a failing of the Safeguarding Policies. Issues relating to Anti-Doping will be dealt with in accordance with British Canoeing Anti-Doping Policy unless the disclosure relates to a failing of the Anti-Doping Policy.
- 3.5 The Head of Governance and Compliance and/or the Chief Executive Officer will make preliminary enquiries. If appropriate they will investigate the matter and take any remedial action to rectify the situation or where such action is not appropriate they will make arrangements for an independent investigation. Any investigation will not, at any stage, be carried out by any person against whom allegations are made. Where at all possible the investigation will be completed promptly, although more complex matters may require a longer and more thorough investigation. The Head of Governance and Compliance and/or the Chief Executive Officer will acknowledge the disclosure and where appropriate keep the person making the disclosure updated as to the outcome of any investigation and any remedial action taken.

- 3.6 British Canoeing will deal with any disclosure fairly and appropriately. However, if in the view of the person making the disclosure the concern is not resolved satisfactorily by the Head of Governance and Compliance and/or the Chief Executive Officer, the person raising the concern may raise the matter directly with the Chair of British Canoeing. The Chair of British Canoeing will make enquiries and, if appropriate, investigate the matter and take any remedial action to rectify the situation. Investigations will not be carried out by any person previously involved in the matter and at no stage will they involve any person against whom allegations are made. Again, any investigation will be done promptly, although more complex matters may require a longer and more thorough investigation. The Chair of British Canoeing will acknowledge the concern and where appropriate keep the person raising the concern updated as to the outcome of any enquiry and any remedial action taken.
- 3.7 If the disclosure relates to either the Head of Governance and Compliance or the Chief Executive Officer, the person may raise the matter directly with the Chair of British Canoeing. The Chair of British Canoeing will make enquiries and, if appropriate, investigate the matter and take any remedial action to rectify the situation. Investigations will not be carried out by any person previously involved in the matter and at no stage will they involve any person against whom allegations are made. Again, any investigation will be done promptly, although more complex matters may require a longer and more thorough investigation. The Chair of British Canoeing will acknowledge the disclosure and where appropriate keep the person making the disclosure updated as to the outcome of any investigation and any remedial action taken.
- 3.8 The matter may be referred to our Disciplinary Policy. It is likely that an investigation will be necessary and the person who has made the disclosure may be required to attend an investigatory hearing and/or a disciplinary hearing (as a witness). Appropriate steps will be taken to ensure that the persons working relationships are not prejudiced by the fact of the disclosure.
- 3.9 Whilst British Canoeing encourages whistleblowing, it will act appropriately if any disclosure is found both to be untrue and maliciously made (the person making the disclosure did not substantially believe them to be true). Such a disclosure may constitute a disciplinary offence for the purposes of the organisation's disciplinary policy and procedures.
- 3.10 Each case will be treated on its own merits.