

Paddington Sports Club (PSC)
POLICY & PROCEDURE ON PUBLIC INTEREST DISCLOSURES
(WHISTLEBLOWING)

1.0 Introduction & Purpose

- 1.1 At PSC we are committed to high standards of honesty and integrity both in conducting our business and participating in sport. It is always possible, however, for things to go wrong and/or for an organisation unknowingly to harbour illegal or unethical conduct.
- 1.2 Players, coaches, employees, volunteers, officials, parents and spectators are often the first to recognise practices or activities that may potentially compromise our integrity. However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation.
- 1.3 The purpose of this policy and procedure guide is to encourage and enable individuals to formally raise concerns about illegal and/or unethical conduct rather than turning a blind eye or perpetuating rumours.

2.0 Activities & practices covered by this policy

- 2.1 To be covered by this policy a person must reasonably believe two things. The first is that they are reporting in the public, general or common interest and not in pursuit of a personal grievance.
- 2.2 The second is that they must reasonably believe the disclosure demonstrates past, present or likely future wrongdoing falling into one or more of the following categories:
 - a. Breach of the rules or regulations of a relevant sport governing body
 - b. Breach of the rules or regulations of funding bodies
 - c. Breach of the PSC Constitution and/or PSC Code of Conduct
 - d. Breaches relating to Safeguarding and/or the protection of children and vulnerable adults
 - e. Breach of rules or regulations relating to Health & Safety
 - f. Risk or actual damage to the environment
 - g. Criminal offences
 - h. Bribery or corruption
 - i. Failure to comply with an obligation set out in law
 - j. Miscarriages of justice
 - k. Acts of bullying, harassment or victimisation

3.0 How to report concerns

- 3.1 Reports of wrongdoing under this policy should be made to the General Manager, Chair of a sectional committee or any member of the PSC Board. Contact details for the General Manager and the Chair of the Board are posted on the main bulletin board in the reception area.
- 3.2 Reports should be made in writing, if possible. The report should identify which of the above breaches/failure/acts apply and give detail of the incident(s) giving rise to the concern,

including the naming of alleged perpetrators. In other words, there should be enough information to enable an investigation to be made.

- 3.3 If a report is made verbally, the person receiving the report should make notes of the conversation at the time or as soon as possible thereafter. This will constitute a signed witness statement by the receiving person.
- 3.4 Names of those reporting a concern will be kept confidential, if so requested. Anonymous reports will be accepted and acted upon, provided there is enough information to enable an investigation to be made.

4.0 Investigating whistleblowing reports

- 4.1 On receiving a whistleblowing report, the receiver should notify the Chair of the PSC Board, preferably by email so as to maintain a clear trail of witness evidence. The message from the receiving person is a witness statement.
- 4.2 The Chair of the Board should then select a person to act as investigator. The role of the investigator is to interview people, gather witness statements and review documentation, so as to establish the facts of the case. The investigator need not be a member of the board nor have any specific qualifications but should have some credibility to act for and on behalf the Board. The investigator should complete a comprehensive investigation report and present this to the Chair of the Board.

5.0 Malicious disclosures

- 5.1 At PSC malicious disclosures are deemed to be allegations made knowing they are untrue, or allegations made as a result of or in pursuit of a personal grievance or dispute. Members should also be careful of allegations against individuals that are 'gossip' rather than breaches or suspected breaches as listed in section 2 above, that the member can personally attest to.
- 5.2 These are often very sensitive issues with many grey areas. They are often picked up at the investigation stage. The Board should seek professional or legal advice before deciding on action.

6.0 Action by the Board

- 6.1 On receipt of the investigation report the Chair of the Board should notify the Board of the results. The Board may need to seek legal advice at this stage. The Board should be aware of the principles of natural justice and the need for due process, especially if employees are involved and where the Employment Rights Act may apply. The Board should agree the next steps to take, taking into account professional advice.
- 6.2 Final actions open to the Board are as follows:
 - a. Sanctions under the Code of Conduct for Members, e.g. official warning or suspension or termination of membership
 - b. Action under the Disciplinary Policy for employees
 - c. Calling in or reporting to the Police
 - d. Other legal action as advised by our lawyers.