

Whistleblowing Policy

1 Introduction

- 1.1 England Hockey (EH) is committed to developing a culture where it is safe and acceptable for all individuals working for the organisation to raise concerns about poor or unacceptable practice and misconduct.
- 1.2 Employees may often be the first to identify some apparent wrongdoing within EH. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to EH. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- 1.3 EH is committed to the highest possible standards of openness, good governance, probity and accountability. In line with that commitment, we expect employees and others we work with who have serious concerns about any aspect of EH's work to come forward and voice those concerns. It is recognised that most cases will need to proceed on a confidential basis.
- 1.4 This policy makes it clear that you can do so without fear of victimisation or disadvantage. This policy is intended to encourage and enable employees to raise concerns within EH rather than overlooking a problem or feeling the need to raise it with someone outside the organisation. This policy also takes account of the Public Interest Disclosure Act 1998.
- 1.5 This policy applies to all employees and those contractors working for EH as well as suppliers and those providing services under a contract with EH. Whilst not specifically applicable to service users or members of the general public, these persons are encouraged, if they have concerns about some apparent wrongdoing within the organisation, to raise their concerns with EH.

2 Scope of Policy

- 2.1 This policy aims to:
 - 2.1.1 Encourage you to feel confident in raising serious concerns, without the fear of being sacked, suspended or victimised.



- 2.1.2 Provide avenues for you to raise those concerns and receive feedback on any action taken (if requested or required).
 - 2.1.3 Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
 - 2.1.4 There are existing procedures in place to enable you to lodge a grievance relating to your own employment. This policy is intended to cover major concerns that you may have which fall outside the scope of other procedures. Thus, any serious concerns that you have about any aspect of service provision or the conduct of officers or members of EH or others acting on behalf of EH can be reported under this policy.
- 2.2 Examples of major concerns will include information which tends to show that:
- 2.2.1 A criminal offence has taken place or is taking place;
 - 2.2.2 There is a danger to the health and safety of any individual;
 - 2.2.3 Damage to the environment;
 - 2.2.4 A serious breach of procedures and guidelines has/is taking place.

3 Protection and Support

- 3.1 EH recognises that the decision to report a concern can be a difficult one to make. If you disclose information in good faith and you reasonably believe that what you say is true, you will have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.
- 3.2 EH will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.
- 3.3 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

4 Confidentiality

- 4.1 All concerns will be treated confidentially. We will make every effort to protect your identity if you request this. If, during the course of an investigation, it becomes clear that further information is needed from you or that your evidence may strengthen the case, we will discuss this with you. You will not be required to act as a witness unless you choose to do so.

5 Anonymous Allegations

- 5.1 This policy encourages you to put your name to your allegation.
- 5.2 Concerns expressed anonymously are much less powerful, but will be considered at the discretion of EH.



5.3 In exercising this discretion, the factors to be taken into account would include:

5.3.1 The seriousness of the issues raised;

5.3.2 The credibility of the concern;

5.3.3 The likelihood of confirming the allegation from attributable sources.

6 Untrue Allegations

6.1 If you make an allegation in good faith, which you reasonably believe to be true, but the allegation is not subsequently confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

7 How to Raise a Concern

7.1 Raising concerns, particularly if they reference colleagues, can be a stressful experience so some points to consider are:

7.1.1 Remain calm and clear about your concern;

7.1.2 Try not to become an investigator, especially where computers are involved;

7.1.3 Be aware that there may be an innocent or good explanation;

7.1.4 Do not use this procedure to pursue a personal grievance;

7.1.5 Think about what the end result may be and what the report could hope to achieve.

7.2 As a first step, you should normally raise concerns with your line manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If you do not think this is appropriate, then you should consider approaching the Chief Executive or Finance and Operations Director, and if this is also not appropriate, then you should consider reporting your concerns to the Chair of the Board.

7.3 Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

7.3.1 The background and history of the concern (giving relevant dates);

7.3.2 The reason why you are particularly concerned about the situation;

7.3.3 If the concern is raised verbally, the person receiving your information should document in writing as soon as practicable to ensure that it properly reflects the concern reported.

7.4 The earlier you express the concern the easier it is to take action.

7.5 You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the concern if there are two (or more) of you who have had the same experience or concerns.



8 How EH Will Respond

- 8.1 EH will respond to your concerns. EH may investigate further before accepting or rejecting the concern.
- 8.2 Where appropriate, the concerns raised may be:
 - 8.2.1 Investigated by the Chief Executive or Finance and Operations Director or another suitable person at EH;
 - 8.2.2 Referred to the Police (where appropriate);
 - 8.2.3 Referred to the external auditor;
 - 8.2.4 Referred to an independent body for further enquiry.
- 8.3 In order to protect individuals and those accused of possible malpractice, initial enquiries will be undertaken by EH to decide whether an investigation is appropriate and, if so, what form it should take.
- 8.4 Some concerns may be resolved by agreed action without the need for further investigation. If urgent action is required following assessment, then this may occur before a full investigation is conducted.
- 8.5 Within 72 hours (working) of a concern being raised, the person receiving your concerns will write to you:
 - 8.5.1 Acknowledging that the concern has been received;
 - 8.5.2 Indicating how we propose to deal with the concern;
 - 8.5.3 Giving an estimate of how long it will take to provide a full response;
 - 8.5.4 Confirming whether any initial enquiries have been made;
 - 8.5.5 Confirming whether further investigations will take place and if not, why not.
- 8.6 The amount of contact between the person considering the issues and you will depend on the nature of the concern raised, the potential difficulties involved and the clarity of the information provided. If necessary, the person dealing may seek further information from you.
- 8.7 Where any meeting is arranged, off-site if appropriate, you will be entitled to have someone accompany you.
- 8.8 EH will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you choose to participate in criminal or disciplinary proceedings, EH will provide advice and support about the procedure.
- 8.9 EH accepts that you need to be informed that the concern has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.



9 The Responsible Officer

- 9.1 The Chief Executive has overall responsibility for the maintenance and operation of this policy and will periodically review its effectiveness. However, it is the responsibility of senior staff to foster arrangements that will freely permit any employee to come forward and voice any concerns covered by this policy.

10 Taking the Concern Further

- 10.1 This Policy is intended to provide you with an avenue within EH to raise concerns. If you do take the concern outside the organisation, you should ensure that you do not disclose confidential information. The Public Interest Disclosure Act 1998 does not provide blanket protection and you could leave yourself vulnerable to disciplinary action if you disclose confidential information in circumstances not covered by the Act.

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