



## **GBS Whistleblowing Policy**

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## Definitions

“Betting”	means making, accepting, or laying a bet and shall include, without limitation, activities commonly referred to as sports betting such as fixed and running odds, totalisator/tote games, live betting, betting exchange, spread betting, peer to peer betting, and other games offered by legal sports betting operators or illegal betting operators;
“Bribery”	means giving or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith;
“Bullying”	means any offensive, intimidating, malicious, or insulting behaviour involving a misuse of “power” that can make a person feel vulnerable, upset, humiliated, undermined, or threatened;
“Chair of the Board”	means the Chair of the GBS Board;
“Concern”	means the reason for why a Disclosure is made. E.g. Criminal activity or malpractice;
“Corruption”	means any dishonest or fraudulent conduct;
“Disclosure”	means making new or secret information known;
“Fraud”	means wrongful or criminal deception intended to result in financial or personal gain;
“GBS”	means GB Snowsport Ltd.;
“GBS Athlete”	means an athlete who is part of a GBS Team/GBS Squad;
“GBS CEO”	means the Chief Executive of GBS;
“GBS Staff”	means staff who are employed by, or acting as a consultant, to GBS;
“GBS Volunteer”	means volunteers who work for GBS without pay;

“GBS Website”	means the official GBS website; <a href="https://www.gbsnowsport.com/">https://www.gbsnowsport.com/</a> ;
“GBS Welfare Officer”	means the Individual responsible for promoting safeguarding within the GBS environment. They ensure a safe and inclusive environment is achieved;
“Grievance”	means a personal concern, issue, or problem;
“Harassment”	means any unwanted behaviour which is found to be offensive or which results in a feeling of intimidation or humiliation;
“HR Representative”	means the person internal to GBS whose role is to represent Human Resources;
“Individual”	means anyone who is subject to the Policy;
“Line Manager”	means the person with managerial responsibility over any individual subject to the Policy;
“Match Fixing”	means any conduct aimed to improperly alter the result or the course of an event or competition in order to remove all or part of the unpredictable nature of the event or competition with a view to obtaining an undue advantage for oneself or for others;
“Performance Director”	means the person who provides leadership and strategic direction of the performance programmes to achieve consistent podium success, effective talent pathways, and coach development;
“Regulatory Statutory Bodies”	means the diverse group of professional and employer bodies, regulators, and those with statutory authority over a profession who are authorised to accredit, approve or recognise specific programmes that meet professional standards;
“Victimisation”	means any bad treatment directed towards someone who has made or is believed to have made or supported a complaint under this Policy or the Equality Act 2010;
“Whistleblower”	means anyone who makes a Disclosure concerning information or activity within and/or pertaining to GBS. The information or activity being disclosed may be illegal, unethical, or not correct;

“Whistleblowing”

means making a Disclosure regarding a serious Concern over something that is illegal, unethical, or not correct inside an organisation;

“Whistleblowing Panel”

means the panel that is formed for the purpose of assessing the Disclosure.

## 1. Introduction

- 1.1. This document contains the GB Snowsport (GBS) Whistleblowing Policy (the “Policy”). GBS Staff, GBS Athletes, and GBS Volunteers may have Concerns about what is occurring in relation to the organisation. It is the duty of everyone within GBS to speak up about genuine Concerns and disclose them. These Concerns are usually best resolved by having a conversation with a Line Manager (or a Performance Director in respect of a GBS Athlete).
- 1.2. Although issues, problems, and Concerns may also be raised under the GBS Grievance Policy, there is a distinction between a Grievance and Whistleblowing. The areas that are covered by the GBS Grievance Policy relate to matters of personal interest and do not impact on the wider public, whilst this GBS Whistleblowing Policy provides the framework for dealing with serious Concerns, such as criminal offences or malpractice.

### Aims

- 1.3. To provide an internal mechanism for reporting, investigating, and remedying any wrongdoing within GBS.
- 1.4. To provide a policy that enables GBS Staff, GBS Athletes, and GBS Volunteers to make a Disclosure either by internal or external means. Under Clause 2, GBS aims to ensure that all Disclosures may be made 'in confidence' (this is subject to the exclusion in 2.4).

### Scope

- 1.5. The Policy applies to all GBS Staff, GBS Athletes, and GBS Volunteers.
- 1.6. The Policy is not designed to cover Grievances (e.g. Personal issues such as Bullying). Information on Grievances and the procedures for dealing with a Grievance are found in the GBS Grievance Policy.
- 1.7. Failure to comply with the Policy will lead to disciplinary action in line with the GBS Disciplinary Policy. If your conduct is unlawful or illegal you may be personally or criminally liable with respect to civil and/or criminal proceedings, claims, or actions.
- 1.8. The Policy is designed to be read in conjunction with the GBS Grievance Policy and the GBS Disciplinary Policy that are published by GBS. These documents may receive revisions and updates occasionally, with the most up to date versions being available on the GBS Website.

## 2. GBS' Assurances

### Commitment

- 2.1. GBS is committed to the Policy. If a genuine Concern is disclosed under it, GBS will use all reasonable endeavours to protect the position of the Whistleblower concerned, provided they are acting in good faith. This assurance does not apply to someone who maliciously raises a Concern that they know is untrue.
- 2.2. The daily environment for GBS Staff, GBS Athletes, or GBS Volunteers may be challenging following a Disclosure, both whilst the Disclosure is being investigated and following the conclusion of the process. If the Whistleblower feels that their environment is not tolerable, discussions should take place with their Line Manager (or the Performance Director in respect of a GBS Athlete). GBS will seek to ensure that they are not disadvantaged as a result of making the Disclosure.

### Confidence

- 2.3. We recognise that a Whistleblower may wish to raise a Concern 'in confidence' to protect their identity. If a Whistleblower asks us to protect their identity, anonymity can usually be kept when a Disclosure is made to the GBS Welfare Officer.
- 2.4. However, anonymity may not always be an option in certain circumstances. For example, If the Disclosure relates to a child safeguarding Concern, the GBS Welfare Officer may need to pass the Whistleblower's details on to Statutory Services. There may also be times where GBS must reveal the Whistleblower's identity to resolve the Concern itself (E.g. Because evidence is required in court).
- 2.5. GBS does not tolerate Bullying, Harassment, or Victimisation of anyone who raises a genuine Concern.

## 3. Disclosing a Concern

- 3.1. When making a Disclosure, a Whistleblower must reasonably believe two things:
  - 3.1.1. That they are acting in the public interest; and
  - 3.1.2. that the Disclosure may fall under one or more of the following headings of malpractice:
    - 3.1.2.1. a criminal offence;
    - 3.1.2.2. Corruption such as Betting, Bribery, Fraud, or Match Fixing;
    - 3.1.2.3. someone's health and safety is in danger (e.g. coercion of a GBS Athlete to train against medical advice);

- 3.1.2.4. a safeguarding Concern;
  - 3.1.2.5. risk of or actual damage to the environment;
  - 3.1.2.6. a miscarriage of justice;
  - 3.1.2.7. an organisation is breaking the law (e.g. inadequate insurance cover); or
  - 3.1.2.8. covering up a wrongdoing (e.g. fabricating test results or supporting cheating).
- 3.2. GBS takes any form of misconduct seriously and has introduced the Policy to enable GBS Staff, GBS Athletes, and GBS Volunteers to raise Concerns early and in the correct manner. It is best to raise the Concern as soon as possible rather than wait for proof to arise.
- 3.3. The Concern can be about an incident that happened in the past, is happening now, or that you believe is likely in the future.
- 3.4. As long as you hold a reasonable belief that the information is true then you will be covered by the protection set out in the Policy regardless of whether you are mistaken, or the matter cannot be proved.
- 3.5. It is important to remember that raising a Concern is encouraged and is not disloyal to other GBS Staff, GBS Athletes, GBS Volunteers, or to GBS itself.

## **4. Confidentiality and Record Keeping**

- 4.1. Confidentiality is an important part of the procedures provided under the Policy, with anonymity being an option for any Whistleblower (subject to the exclusion in 2.4).
- 4.2. Information about a Disclosure's investigation may be placed on file, along with a record of the outcome and of any notes or other documents compiled during the process. Records of Disclosures will be kept in accordance with applicable law by the GBS Welfare Officer.
- 4.3. A breach of confidentiality may give rise to disciplinary action under the GBS Disciplinary Policy. Disciplinary action will not apply in safeguarding cases where the breach of confidentiality is justified (for example, in circumstances where it is necessary to inform the Whistleblower's Line Manager of the Concern without their consent).
- 4.3.1. Individuals who are handling confidential information should use the "Seven Golden Rules to Sharing Information" as guidance, found within "Information Sharing - Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers" published by HM Government.



## **5. Procedure**

- 5.1. Once GBS has been made aware of a Concern we will make an initial assessment in order to decide what action should be taken.
- 5.2. This may involve:
  - 5.2.1. an internal investigation; or
  - 5.2.2. an external review/investigation completed by independent experts who are not involved in the operation of GBS.
- 5.3. The Whistleblower making the Disclosure will then be made aware of who is handling the Concern, how they can be contacted, and whether they will be required to assist in the future. A Whistleblowing Panel will then be formed based on the needs of the case, which will be composed of those who have the knowledge required to fairly assess the Disclosure.
- 5.4. GBS will act as quickly as possible to resolve the Concern though the time taken to come to a resolution will depend on the nature of the Disclosure. If appropriate and confidentiality allows, the Whistleblower may be kept informed though this may not always be possible.
- 5.5. When raising a Concern, the Whistleblower may be asked how they feel the matter might best be resolved. At this stage, we must be made aware of any personal interest in the matter. If the Concern is deemed to be covered more appropriately by Grievance proceedings, we will make the Individual aware and direct them to the GBS Grievance Policy

## **6. Raising a Concern Internally**

- 6.1. Those who have a Concern about misconduct would ideally raise it in the first instance with the GBS Welfare Officer. This may be done orally or in writing. The Whistleblower must state whether they wish to raise the matter 'in confidence' (to remain anonymous) so the appropriate arrangements can be made (However, anonymity may not be an option for the reasons stated in 2.4). Alternatively, the Whistleblower may raise the Disclosure with their Line Manager, or with their HR Representative or Performance Director.
- 6.2. If after following these concerns the Whistleblower feels the matter has not been addressed, or if they feel that the matter is so serious that they cannot discuss it with any of the above, they should contact the GBS CEO.
- 6.3. If the Whistleblower is still not satisfied with the decision making process or the action taken they can go to the other levels of escalation, such as raising the Disclosure with the GBS CEO or pursuing other external avenues.

## **7. Raising a Concern Externally**

- 7.1. Some professions, such as medicine and physiotherapy, have statutory duties to inform certain categories of Disclosure externally. In Disclosure cases such as criminal misconduct, child or adult at risk abuse, all GBS Staff, GBS Athletes, and GBS Volunteers must inform the Regulatory Statutory Bodies without undue delay.
- 7.2. The Disclosure process when dealt with internally by GBS may be duty bound to report this externally to Regulatory Statutory Bodies. A list can be found in Clause 9.1.

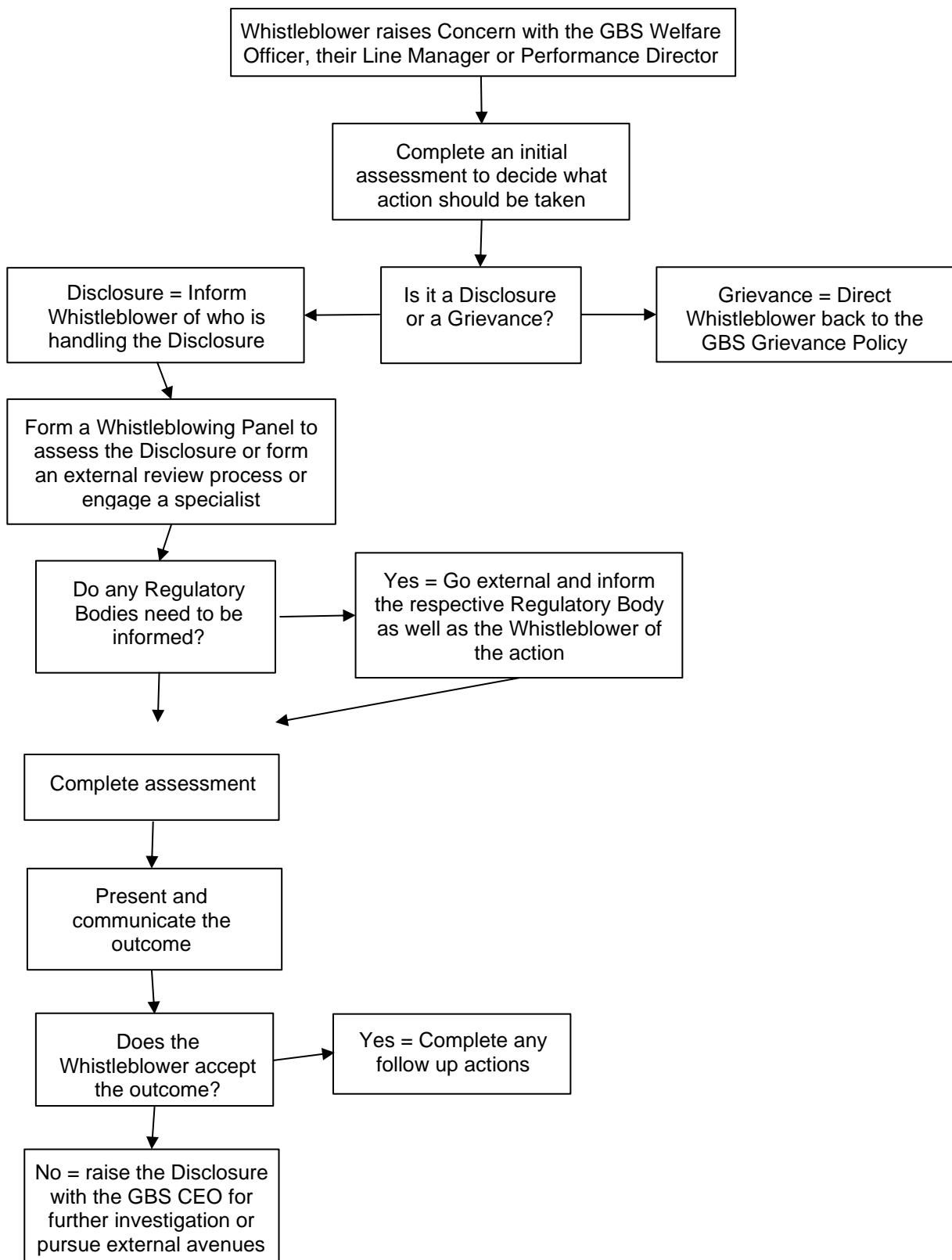
## **8. Informing the Board**

- 8.1. The GBS CEO will notify the Chair of the Board when a Whistleblowing case has instigated an investigation made by the Whistleblowing Panel. Details of the case will not be discussed at that stage.
- 8.2. Once the Whistleblowing Panel's findings are concluded, the GBS Board will be fully informed, in confidence.

## **9. Further Information**

- 9.1. As mentioned in Clause 7, the Regulatory Statutory Bodies are listed here: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>
- 9.2. 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.

## Appendix A: Process Flow Chart



<b>Owner:</b>	Senior Leadership Team
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