

Document No: UKA/POLICYTEMPLATE/0.2



WHISTLEBLOWING POLICY – EXTERNAL

Click or tap here to enter text.

UKA/Document Name/version	UKA/Whistleblowing-external/001			
Policy owner	Mark Draisey			
Applicable to	Those other than employees, consultants, agency staff or volunteers			
Approving body	Board committee			
Date approved by approving body	04/10/2022			
Next review date	04/10/2025			



BACKGROUND INFORMATION

POLICY REQUIREMENT: Why does the policy exist? (Select one)

Legal requirement		Enter relevant legislation:	Click or tap here to enter text.
Code of Sports Governance requirement			
Self-assessment requirement			
Best practice	\boxtimes		
Other		Please state:	Click or tap here to enter text.

If Other, please state: Click or tap here to enter text.

Document Purpose	To advise external individuals how to raise a matter covered by this policy				
Target Audience	Those other than employees, consultants, agency staff or volunteers – the policy also covers Athletes				
Equality Impact Assessment (EIA) done?	YES □ NO □ N/A ☒				
Name of Lead Officer undertaking EIA	Click or tap here to enter text.				

HAVE APPROPRIATE INTERNAL STAKEHOLDERS BEEN CONSULTED? (Select all that apply)

Consultees	Yes	No	N/A
Human Resources			\boxtimes
Health & Safety			\boxtimes
Finance			\boxtimes
Operations Management Group			\boxtimes
Performance			\boxtimes
TV Events			\boxtimes
UKA Colleague Action Group			\boxtimes

APPROVAL PATHWAY FOR THE POLICY?

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(Select all that apply e.g. if it is a requirement that a policy is approved by both SLT and then Board both the SLT

and Board boxes should be selected).

Approving body	Yes		
Board			
Board committee	\boxtimes	Enter committee name:	Audit Committee
Senior Leadership Team (SLT)			
Operations Management Team			
Performance			
TV events			

DOCUMENT REVISION: CONFIRMATION BY POLICY OWNER

I confirm that I have reviewed this document and:	Select as appropriate:
a) No changes are required.	
b) Some minor editorial changes were required. These do not change the substance of the document.	
c) There are material changes that are summarised in the document history table at the front of the revised document.	\boxtimes

Signed: Name:

Name: Mark Draisey

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Title: CFO

Date: 04/10/2022

UKA

DOCUMENT HISTORY

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Revision Number	Date	Amendments
001	04/10/2022	New policy – wording agreed at Audit Committee and included on policy template
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Whistleblowing Policy - External

Introduction

This policy outlines the process by which any individual involved with or engaging with UK Athletics can raise a concern with UK Athletics for investigation. For the avoidance of doubt, UK Athletics includes British Athletics and GB&NI Teams. It does not apply to those who conduct work on behalf of UK Athletics (UKA): whether full-time or part-time employees, consultants, staff engaged through an agency or as a volunteer, a separate internal policy applies.

Whistleblowing is encouraged by UK Athletics, as it is important to the business that any fraud, misconduct, bribery, corruption or wrongdoing within the organisation is reported and properly dealt with. The company therefore encourages you to raise any concerns that you may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

Background

We would ask you to "raise a concern" which you reasonably believe that one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:

- a criminal offence.
- the breach of a legal obligation.
- a miscarriage of justice.
- a danger to the health and safety of any individual.
- damage to the environment.
- deliberate concealment of information tending to show any of the above five matters.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable and honest belief is sufficient, but we ask that you provide as much information as possible. It is not the whistle-blower's responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

A whistle-blower who makes such a protected disclosure has the right not to be subjected to victimisation because they have made the disclosure.

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Principles

UK Athletics adhere to the below principles:

- Everyone involved with the organisation should be aware of the importance of preventing and eliminating wrongdoing
- When a disclosure has been made, the whistle-blower will receive a written receipt, usually within 48 hours (if received during business hours), which will outline the proposed next steps and immediate timeline. Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially. The whistle-blower should be reassured that regular contact will be maintained.
- Where possible feedback will be given, unless the outcome cannot be shared, due to confidentiality.
- No whistle-blower will be victimised for raising a matter under this procedure, the whistleblower will not be prejudiced because they have raised a genuine concern.
- We will not tolerate the harassment or victimisation of anyone raising a genuine concern.
- If misconduct is discovered as a result of any investigation under this procedure the company's Disciplinary Policy will be used, in addition to any appropriate external measures.
 - An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent.
- With these principles, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.
- Please remember that if you do not tell us who you are (and therefore you are raising a concern anonymously) it will be much more difficult for us to look into the matter. We will not be able to protect your position or to give you feedback. Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

Procedure

In the first instance any reports of whistleblowing should be raised via email with the Chief Executive at ceooffice@uka.org.uk who will instigate the investigation either directly or through an appropriate senior manager.

If this channel has been followed and you still have concerns, or if the Chief Executive is implicated or if you feel that the matters is so serious that you cannot discuss it with the Chief Executive then the matter should be referred to the Chair of UKA at chair@uka.org.uk

While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you can properly report a concern to an outside body. Where this is applicable, we would rather you raised a matter with the appropriate regulator. These include:

HM Revenue & Customs.

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- The Health and Safety Executive.
- The Environment Agency.

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• The Information Commissioner's Office.

The Department for Business, Energy and Industrial Strategy list of prescribed people and bodies can be accessed at:

https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

The charity Protect (formerly known as Public Concern at Work) can be accessed by clicking on the following link https://protect-advice.org.uk/

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Equality Impact Assessment

Section A

Date of screening	04/10/22
Name of person and job title of	Mark Draisey - CFO
the person screening	
What is being screened?	Whistleblowing Policy - External

	Yes	No	Notes
Is this a decision being taken to the Board?		\boxtimes	Click or tap here to enter text.
Is this a document that provides guidance for employees?	\boxtimes		Indirect impact

If the answer to any of these is yes, please go to Section B. If the answer is no, you do not require to complete an EQIA.

Section B

	Yes	No	Notes
Does the decision or policy impact disproportionately on gender and does the policy resolve this? (This can include pregnancy/maternity and marriage/civil partnerships?)		\boxtimes	Click or tap here to enter text.
Does the decision or policy impact disproportionately on different age groups?		\boxtimes	Click or tap here to enter text.
Does the decision or policy impact disproportionately on people from different ethnic groups?		\boxtimes	Click or tap here to enter text.
Does the decision or policy impact disproportionately on people with a disability or disabilities?		\boxtimes	Click or tap here to enter text.
Does the decision or policy impact disproportionately on people from different religions, faiths or beliefs?		\boxtimes	Click or tap here to enter text.

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Does the decision or policy impact disproportionately on people from different sexual orientations?	\boxtimes	Click or tap here to enter text.
Does the decision or policy impact disproportionately on transgendered people?	\boxtimes	Click or tap here to enter text.
Does this decision or policy potentially affect the health and safety of the employees or other parties?	\boxtimes	Click or tap here to enter text.
Any other changes to the policy required?	\boxtimes	Click or tap here to enter text.

Signed: Name:

Name: Mark Draisey Date: 04/10/2022

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