



St. Paul's Boxing Academy CIO
Policy on Whistleblowing



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1. Statement of Intent

It is important that any fraud, misconduct or wrongdoing by volunteers, staff or others working on behalf of St Paul's Boxing Academy CIO is reported and properly dealt with. We therefore encourage all individuals to raise any concerns that they may have about the conduct of others in the charity or the way in which the organisation 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.

2. Aim

The aim of this policy is to enable and encourage anyone working or volunteering with St Paul's Boxing Academy CIO to raise concerns about possible wrongdoing without fear of reprisal and to give reassurance that such concerns will be dealt with seriously and effectively.

3. What is whistleblowing?

Whistleblowing is a term used to refer to the internal or external disclosure of malpractice as well as illegal acts or omissions. It covers for example how St Paul's raises funds, commissions work, makes payments. The Public Interest Disclosure Act (PIDA) 1998 (see section 4) provides protection for employees who raise legitimate concerns about the following:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

It is not necessary to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. Staff and volunteers have no responsibility for investigating the matter - it is the charity's responsibility to ensure that an investigation takes place.

4. Principles

Although the Public Interest Disclosure Act (PIDA) 1998 provides protection for workers who raise legitimate concerns about specified matters in the public interest there is no such protection in law for volunteers and others involved with a charitable organisation. At St Paul's CIO we aim to conduct ourselves ethically, with honesty and integrity and believe the principles of natural justice should apply. Consequently:

- Volunteers and others involved with the charity should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this policy will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No-one working on behalf of the Academy will be victimised for raising a matter under this procedure.
- Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure our disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- 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. You should report the matter to the Chair of the Board of Trustees.

5. Non whistleblowing concerns

This policy should only be used with reference to the exceptional circumstances outlined in Section 3 above. There are a number of other policies which are relevant in other circumstances. These include:

- Safeguarding
- Grievance procedure
- Bullying and harassment

6. Procedure

If you are unsure whether to raise a concern it is recommended you seek advice. Protect is a charity providing free, confidential advice. (www.protect-advice.org.uk)

Stage 1:

Any concerns should be raised with the Club Welfare Officer (CWO) who will arrange an investigation of the matter which will be carried out in accordance with the principles set out above. Your statement (verbal or in writing) will be taken into account, and you will be asked to comment on any additional evidence obtained. The CWO will take any necessary action, including reporting the matter to the Chair of the Board of Trustees and any appropriate government department or regulatory agency. The CWO will also invoke any disciplinary action required. On conclusion of any investigation, you will be told the outcome and what the charity has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

Stage 2:

If you are concerned that the CWO is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should escalate the matter to the Chair of the Board of Trustees. The Chair will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the Board.

Stage 3:

If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. We strongly encourage you to exhaust the internal process before escalating the matter externally.

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority

Disclosures to the press or social media will not be deemed reasonable and may constitute misconduct and as such will be treated as a disciplinary matter.

Data protection

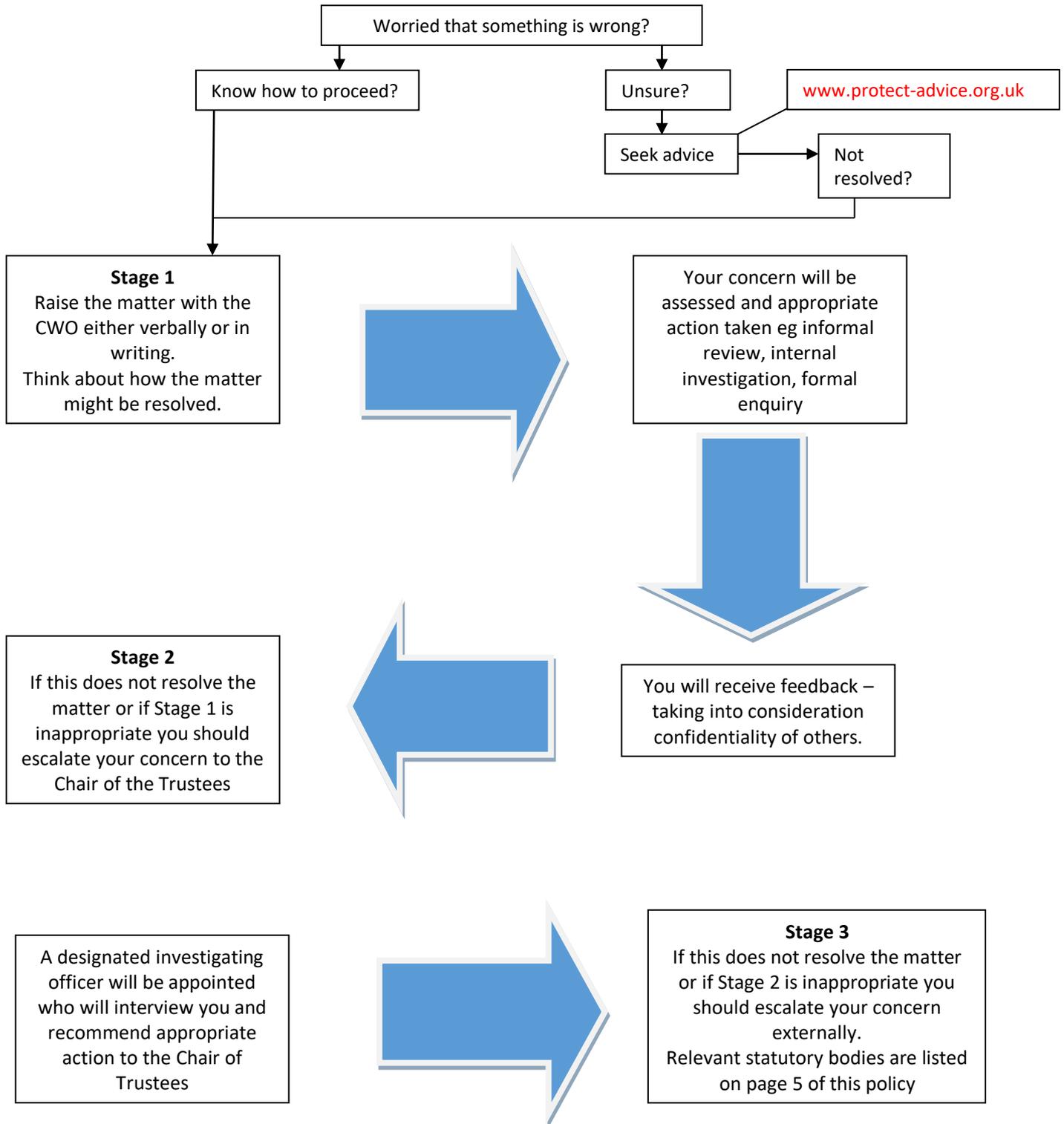
When a person makes a disclosure, we will process any personal data collected in accordance with our data protection policy. Data collected from the point at which the person makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Date: April 2020

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Appendix 1

How to raise a concern flowchart



If in doubt - raise it!

Appendix 2

What to report

You can report on issues that have happened, are happening or are about to happen.

These might include issues that could harm:

- people St Paul's CIO works with;
- services offered by St Paul's CIO
- the charity's assets;
- the reputation of St Paul's CIO

Examples:

- if someone's health or safety is in danger for example if the Academy is not following its Safeguarding procedures;
- a criminal offence eg theft, fraud or financial mismanagement;
- loss of charity funds ie if the Academy loses more than 20% of its income or £25,000.
- if the Academy is using its activities as a platform for extremist views;
- if members of the charity are using their position for personal gain.

Appendix 3

Guidance – information required when raising a concern

To help us to investigate your concerns it would be helpful if you could be as clear as possible about the details.

- Date/s of incident/s
- Type of incident – see Appendix 1 for help with this
- Descriptions of incident/s or details of your concerns
- Where did it happen?
- Who was or has been involved?
- In your opinion how might the matter be resolved?

If you feel comfortable sharing your identity please provide your name and contact details.