



Whistleblowing Policy

Adopted July 2023

Next Review: July 2025

Whistleblowing policy

The scope of this policy

This policy defines how Coolsportz will support a whistleblower to feel comfortable and secure if they feel it necessary to report suspected or actual wrongdoing, bad practice, corruption, malpractice, maladministration and/or the possible covering up of these actions in relation to our programmes.

It relates to all provision by Coolsportz.

Coolsportz takes any disclosures from whistleblowers seriously and we are committed to our participants, contractors and other stakeholders to providing a transparent and honest working environment that's free from wrongdoing, bad practice, or corruption.

The steps that Coolsportz will take are outlined in this policy

What is whistleblowing?

Whistleblowing is a term used when an individual discloses information relating to wrongdoing, bad practice, corruption, malpractice, maladministration and/or the possible covering up of these actions.

In line with the Public Interest Disclosure Act 1998 an individual can raise disclosures under our policy. Provided these are made in good faith and are reasonably believed to be true, the person reporting the concern should be protected against dismissal or victimisation.

Whistleblowers could be a:

- current or former member of the team (both permanent or contracted);
- third party suppliers;
- current or previous participants;
- members of the public;
- individuals from partner organisations or interested parties.

Examples of disclosures accepted via this Whistleblowing policy may comprise of, but are not limited to the following scenarios linked to the delivery of our programmes:

- A failure to adhere to the requirements of the participating in the provided activities
- A person has committed, is committing or is likely to commit maladministration or malpractice.
- A member of Coolsportz team staff has committed, is committing or is likely to commit maladministration or malpractice.
- Any action to deceive an individual which has led to financial gain (e.g. not paying for booked sessions).
- Safeguarding incidents that have not been satisfactorily disclosed and/or managed
- A failure to manage or address health and safety risks.

- Concealment of information relating to any of the above.

Whistleblowing does not apply to making a complaint.

Submitting a disclosure as a whistleblower

Where there is a concern that suspected or actual malpractice has taken place in relation to our provision, normal practice is to raise it through the line management at the organisation concerned.

For a participant or parent of a participant the first point of contact should be a member of Coolsportz team. If concerns are not addressed at this stage, or the individual does not feel it is possible to raise concerns with the team member, then the disclosure should be directly raised with the Coolsportz Director through a writing.

The information needed in a disclosure

We require as much information as possible to address and manage the concerns raised through the disclosure. Where possible, and where the individual feels comfortable and secure to do so, this should include the:

- Name and address;
- Participants name and details if different from the whistleblower's;
- details of any Coolsportz team members if they are involved in the case (e.g. name, position)
- details of the programme or service affected;
- nature of the concern that has led to the disclosure. This could include:
 - The nature of the concern (e.g. suspected or actual malpractice).
 - Associated dates.
 - Details of the people involved.
 - Details about the number of other people this might have affected.
 - Any other information related to the concern.
- details of any evidence that supports the concerns raised;
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How Coolsportz will manage the whistleblow

Maintaining anonymity in anonymous disclosures

Sometimes an individual making an allegation in a disclosure wishes to remain anonymous if there are concerns about possible adverse consequences as a result of making the allegation. However, we encourage anyone making a disclosure to put their name to any disclosure they make, because concerns expressed anonymously can be seen as less credible.

Coolsportz will take the following criteria into account when deciding the steps to take to address an anonymous disclosure:

- The seriousness of the issues raised.
- The credibility of the concern.
- The sufficiency of information provided.

- The likelihood that we can confirm the allegation from attributable sources.

Providing we are confident the disclosure satisfies the above criteria, we will investigate the anonymous disclosure. In addition, we will always try to confirm an allegation by means of a separate investigation before taking up the matter with those the allegation relates to.

If we are not confident the disclosure satisfies the above criteria, we will log the allegation internally, and it may be used for future reference, decision making or setting corrective actions, if appropriate.

Confidentiality of the whistleblower

We will always endeavour to keep the identity of a whistleblower and investigation information confidential, although by law and/or regulation we may need to disclose it to:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud);
- the courts (in connection with any court proceedings);
- another person to whom we are required by law to disclose the identity of the whistleblower.

Whistleblowers should also be aware that they may be identifiable by others due to the nature and/or circumstances of the disclosure and its investigation.

Confidentiality of investigation information

In performing the investigation Coolsportz may need to access confidential information. We will ensure that such information is kept secure and only used for the purposes of an investigation and in line with relevant data protection legislation.

We will not normally disclose the information to third parties unless required to do so by law.

Responding to a whistleblower disclosure

Coolsportz will acknowledge receipt of disclosure within five working days, identifying who will be investigating into the whistleblow.

Further information or clarification may be requested during this period to ensure we have full details of the concerns raised. In some instances we may request a meeting with the whistleblower to get more information about the disclosure.

For all disclosures received from whistleblowers, Coolsportz will ensure that the person making the response will not have a conflict of interest in the reason the disclosure was raised. If there is a conflict of interest that cannot be mitigated against an independent review of the disclosure by the whistleblower may be initiated.

A summary of the outcome to the investigation into a whistleblowing concern should be expected within 20 working days. We will not share the details of the investigation given our need to protect confidentiality.

If the investigation into the cause of the whistleblow is more complex or involves people who are not available at the time, we may extend this. In such instances, Coolsportz will contact all parties concerned to inform them of what steps are going to be taken and provide a revised timescale.

Informing others of the investigation into a disclosure from a whistleblower

Following the initial steps of the investigation into the concerns raised in a disclosure, we may be obliged to inform relevant parties of the investigation. This would be done to support our safeguarding obligation to address and set corrective actions to resolve any suspected or actual wrongdoing, bad practice, corruption, malpractice, maladministration and/or the possible covering up of these actions in relation to our programmes.

Closing an investigation into a whistleblow

Following completion of an investigation into a disclosure made by a whistleblower, Coolsportz will:

- compile a report to relevant parties (as identified above);
- set actions to correct or address any areas of programme delivery where wrongdoing, bad practice, corruption, malpractice, maladministration and/or the possible covering up of these actions are found (where relevant and appropriate);
- provide a summary of the investigation to the whistleblower;
- take actions that Coolsportz see as necessary to protect the interests of participants and maintain the validity of our programmes.
- record and securely store all details relating to the whistleblow.

Contact us

If you would like to inform Coolsportz of a whistleblowing situation please contact Neil Supperstone – nsupperstone@hotmail.com with the details specified in the whistleblowing policy.



Signed

Name/Position...Neil Supperstone, Manager.....

Date.....12/7/23.....