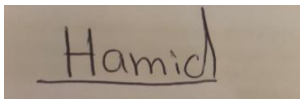




## Whistleblowing Policy

Approved by:	H Anwary
Signed:	
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V1	Apr 2024	Policy re-written and amended
V2	Jan 2025	Reporting persons amended

# Whistleblowing Policy

## Introduction

The aims of this policy are:

- to encourage stakeholders (i.e. members, participants, staff and volunteers) to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality shall be protected;
- to provide stakeholders with guidance as to how to raise these concerns;
- to reassure stakeholders that they should be able to raise concerns without fear of reprisals, even if the concerns are mistaken;

This policy may be amended at any time.

## What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of our internal policies and procedures (including our Code of Conduct);
- conduct likely to damage our reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters;
- equality incident.

A whistleblower is a person who raised a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a 'Whistleblowing Concern') you should report it under this policy.

## Raising a Concern

If you suspect or discover a Whistleblowing Concern, you should report it by email to [admin@activeswim.co.uk](mailto:admin@activeswim.co.uk)

Upon raising a Whistleblowing Concern you will receive a written confirmation of receipt, usually within 48 hours (if your concern was made by email and during normal working hours).

Where an anonymous disclosure is made, it may be investigated depending on the nature of the concern, the seriousness of the issues raised, their credibility and the likelihood of Swim England being able to confirm the allegations by attributable sources.

## **Procedure**

- Your concerns will be subject to an initial assessment by the referring to the **Designated Safeguarding Lead or nominated person**, the scope of any review or investigation necessary, and whether this review will be carried out internally or externally.
- Upon completion of the initial assessment, Active Swim will inform you of the outcome. You will be informed of the steps we plan to take to resolve the concern or, if we decide that no further action is warranted, we will explain the reasons for our decision.
- If further information is required, Active Swim will contact you for further information or to arrange a meeting to discuss the concern. If a meeting takes place, you may bring an additional person for support, though this person must respect the confidential nature of the process.
- If concerns are expressed about a staff member of the institution for hire, then the Headteacher will be contacted.
- In some cases, we may appoint an investigator or team of investigators including staff with relevant experience. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving
- you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- Enquiries will be undertaken promptly, although some more complex Whistleblowing Concerns will require a longer, more thorough, investigation.
- Upon completion, we will inform you of the outcome of our investigations and any remedial action taken.

## **Confidentiality**

- If you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- We do not encourage people to raise concerns anonymously, as where we are unable to obtain further information from you, investigation and resolution may become more difficult or impossible.
- Due to the often sensitive nature of Whistleblowing Concerns, you too should treat the process as confidential. All public statements and speculation should be avoided whilst there is an ongoing review/investigation to avoid prejudicing the process.

## **External Disclosures and Investigations**

- In some instances, particularly those involving safeguarding, it will be necessary to refer the matter to the Safeguarding Team internally or an external authority, for example, the police or LADO.

- Where possible confidentiality will be maintained, although it must be stressed that in cases of fraud and in cases of safeguarding it will not be possible to maintain strict confidentiality.
- In disclosure cases such as safeguarding, criminal misconduct, child abuse or adults at risk, all athletes, contractors, coaches, volunteers or officials must inform the regulatory authorities (i.e. police, social services) without undue delay, as soon as possible. We will contact Swim England for referral and follow guidance. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to any external authorities.

### **Whistleblower Protection and Support**

- It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support people who raise genuine concerns under this policy, even if they turn out to be mistaken. We encourage you to raise a matter as a concern rather than waiting for proof.
- You must not suffer any detrimental treatment as a result of raising a genuinely held concern. Detrimental treatment includes but is not limited to disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- If you believe you are being subjected to detrimental treatment as a result of raising your concern, or that the swimming environment has become intolerable, you should discuss the matter with our admin team, who will signpost to a suitable person or organisation.

### **Malicious allegations**

- Individuals reporting genuinely held concerns will always be protected and supported by Swim England, whether their concerns are proved to be true or not.
- If a whistleblower is deemed to have raised false allegations maliciously, or for personal gain, Swim England may bring disciplinary action against them in accordance with the

### **Judicial Regulations**

If you are not satisfied with an outcome:

- We strive to ensure that any Whistleblowing Concern is dealt with fairly and appropriately.
- If you are not happy with the way in which your concern has been handled, you may choose to make a complaint under the Active Swim by following our Formal Complaint procedure.