



Whistle-Blowing Policy

November 2022

Introduction

Bowls England aims to make our sport as safe possible. Part of this mission is to recognise our responsibility in promoting a safe environment. To achieve this aim, we encourage anyone with genuine concerns about suspected malpractice, illegal acts or failure to comply with recognised policies, codes or standards to report their concerns without fear of reprisals or victimisation.

Who does this policy apply to?

This policy applies to anyone employed by, engaged under a contract by or volunteering directly for Bowls England. We recommend that all County Associations and Clubs adopt a similar policy for their employees, contractors and volunteers. Anyone that is not covered by this policy, who feels that they have a legitimate complaint or concern about the conduct of anyone else within our sport should refer to Bowls England Regulation 9.

What is whistle-blowing?

Whistle blowing is an early warning system, raising concerns over misconduct or malpractice within an organisation or independent structure associated with it.

Bowls England will not tolerate harassment or victimisation of a genuine whistle-blower. We comply with The Public Interest Disclosure Act. For disclosures to be protected by the acts provision they must show that the individual believes one of more of the following is happening, took place in the past, or is likely to happen in the future:

- A criminal offence
- A breach of legal obligation
- A financial or non-financial maladministration or malpractice
- A failure to comply with the rules, regulations and policies of Bowls England, including but not limited to Equality, Safeguarding, Disciplinary and Anti-Doping
- A miscarriage of justice
- A danger to the health and safety of any individual
- A damage to the environment
- A deliberate concealment of information to any of the above

This policy does not apply to any personal grievances concerning and individuals contractual terms, or other aspects of the working relationships such as complaints of bullying, harassment or disciplinary matters.

A report or disclosure must not be made for the purposes of personal gain. Concerns must be raised in good faith and the individual must reasonably believe that the information disclosure is accurate. Individuals will not be penalised for raising disclosures, however malicious and false allegations will be regarded as a serious disciplinary offence.



Why should you disclose your concern?

Bowls England is committed to good practice and high standards and wants to be supportive of everyone within the lawn bowls community.

We recognise that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the alleged poor practice.

If an individual believes what they are saying to be true, they should have nothing to fear because in reporting their concern they will be doing their duty to the child, young person or adult concerned.

How to disclose a concern?

We advise that if you wish to make a disclosure you should:

- Disclosure your concerns in a timely manner, this will avoid any misinterpretation of the motives behind the concern
- Focus on the issues and proceed tactfully to avoid your disclosure appearing like a personal vendetta
- Ensure that you are factual and accurate in your claims, including any formal records of the relevant events

There are many sources of advice if you wish to seek independent help on whether to and how to proceed. Some of which are listed below:

- The Public Interest Disclosure Act, provides further information click [here](#) to read through the guidance.
- The Protest Charity, provides free confidential advice to workers who have concerns in the work place. Click [here](#) for more information.

Where to disclose any concerns?

Concern	Who to raise it with	Contact details
Board Member/ Chief Executive	Chair of the Board	david.tucker@bowlsengland.com
Elected/Appointed Volunteer	Chief Executive	jon.cockcroft@bowlsengland.com
Contractor/ Employee	Chief Executive or Head of Business Operations	jon.cockcroft@bowlsengland.com or helen.slimm@bowlsengland.com
Operational Area i.e. Safeguarding, Anti-Doping, Financial etc.	Head of Business Operations or Chief Executive	jon.cockcroft@bowlsengland.com or helen.slimm@bowlsengland.com



How will concerns be dealt with?

When a disclosure is made, an initial acknowledgement will be given along with an estimated time on when the preliminary investigation will be conducted and who will be conducting it. Depending on the circumstances the accused may be suspended through the investigations. The investigating officer will decide, either using the information provided or investigating further whether:

- There is enough evidence for there to be a case to answer.
- The matter should be dealt with under this whistle blowing policy or under a different policy.
- A full investigation should be conducted and what form it should take:
 - Internal Investigation
 - Referral to external advisors (HR, Auditors, Lawyers)
 - Relevant outside body (Police, CPSU, Sport England, UK Anti-Doping)
 - Independent Body

The answer to the above will be communicated to the individual making the disclosure.

If the investigating officer decides not to proceed with a full investigation, the reasons for that decision will be explained as fully as possible to the individual making the disclosure. The individual is then able, should they wish to make another disclosure to another contact listed above.

The details of the full investigation, including any disciplinary action will be kept confidential with the outcome being reported to the Bowls England Board. A formal record will be retained by either the Head of Business Operations or the Chief Executive for at least seven years and will include a signed statement by the investigating officer and the individual making the disclosure.

What about confidentiality?

Anonymous complaints are not covered by this policy and may not be investigated. In view of the protection afforded to whistle-blowers, individuals should put their name to any disclosure. The identity of the whistle-blower will be kept confidential, if so requested, for as long as possible provided that this is compatible with a proper investigation.

What about retaliation?

Bowls England has an obligation to shield whistle-blowers who make a protected disclosure in good faith. If however, you feel that you have suffered adverse treatment as a result of making a disclosure, you should submit a formal complaint. All reports of whistle-blowers suffering adverse treatment, harassment or victimisation as a result of a disclosure will be taken exceedingly seriously.