

Sports Leaders UK Whistleblowing Policy

Overview of the policy

Introduction

This policy covers both Sports Leaders UK (we, us, our etc.) qualifications which are subject to scrutiny and enforcement by our qualification regulators (regulated qualifications) and unregulated products which are owned and / or offered by Sports Leaders UK.

Purpose of the policy

Sports Leaders UK are committed to our centres providing a transparent and honest working environment that's free from wrongdoing, bad practice, or corruption. The purpose of this policy is to allow learners, Tutors Assessors and centre staff, including Centre Course Managers, to feel comfortable and secure if they want to report suspected or actual wrongdoing, bad practice, or corruption on the part of another or the centre's practices relating to our regulated and non-regulated products.

In line with the Public Interest Disclosure Act 1998 you 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.

Who needs to know about the policy?

You must make your staff that are involved in the administration, delivery, management, assessment and quality assurance of our products and your learners aware of, and familiar with, the contents of the policy.

Reviewing the policy

We will review the policy as part of our self-evaluation arrangements and revise it as and when necessary in response to customer and learner feedback or requests from, or good practice guidance issued by, the regulatory authorities

If you would like to feedback any views please contact us via the details provided at the end of this policy.

Complaints and Appeals

You have the right to express your dissatisfaction regarding our actions, products or services or appeal against a decision that we have made. A complainant should refer to the Sports Leaders UK Complaints policy or if appealing against a decision the appellant should refer to the Sports Leaders UK appeals 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. Definitions of malpractice and maladministration can be found in Sports Leaders UK's Malpractice and maladministration Policy.

Examples of disclosures accepted via this Whistleblowing policy may comprise of, but are not limited to:

- A failure to adhere to regulation and/or the Sports Leaders UK Terms and Conditions
- A person has committed, is committing or is likely to commit maladministration or malpractice
- A member of our 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 (for example not registering learners with us following payment)
- Health and safety risks
- Concealment of information relating to any of the above.

Whistleblowing doesn't apply to either making a complaint or an appeal. A complaint is usually a grievance and could relate to poor administration or customer service. An appeal is usually a disagreement with a decision on awarding approval or certificates for a Centre.

Submitting a Whistle-blower disclosure

Where there's a concern that suspected or actual malpractice has taken place in relation to our products, normal practice is to raise it through the line management at the organisation concerned. For a learner/delegate the first point of contact would be the Tutor Assessor.

If your concerns aren't addressed at this stage, or you feel it's not possible to raise concerns with the centre, then you should contact and address concerns directly to Sports Leaders UK in writing.

What information will we need from you?

We require as much information as possible and where possible this should include: -

- Centre's name, address and number
- learner's name and Sports Leaders UK registration number
- Centre/Sports Leaders UK personnel's details (name, job role) if they are involved in the case
- details of the Sports Leaders UK course/qualification affected or nature of the service affected
- nature of the suspected or actual malpractice and associated dates
- details and outcome of any initial investigation carried out by the Centre or anybody else involved in the case, including any mitigating circumstances

If a Centre has conducted an initial investigation prior to formally notifying us, the Centre should ensure that staff involved in the initial investigation are competent and have no

personal interest in the outcome of the investigation. However, it is important to note that in all instances the Centre must immediately notify us if they suspect wrong doing, malpractice or maladministration has occurred as we have a responsibility to the regulatory authorities to ensure that all investigations are carried out rigorously and effectively.

The individual can use the form at the end of this policy to whistle blow on practice that they deem to be suspected maladministration or malpractice.

Anonymous Disclosures

Sometimes a person making an allegation of malpractice or maladministration may wish to remain anonymous. Although Sports Leaders UK encourages anyone making a disclosure to put their name to increase credibility. If you are concerned about possible adverse consequences request us not to divulge your identity.

Sports Leaders UK will need to take the following into account when deciding whether to consider an anonymous disclosure:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood that we can confirm the allegation from attributable sources.

While we are prepared to investigate issues, which are reported to us anonymously and/or by whistleblowers¹ we shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those the complaint/allegation relates. The form and guidance for reporting an issue can be found in the Complaints and Whistleblowing policy.

We encourage anyone making a disclosure to put their name to any disclosure they make, because concerns expressed anonymously can be less credible.

We'll need to take the following into account when deciding whether to consider an anonymous disclosure:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood that we can confirm the allegation from attributable sources.

We may accept a disclosure from a person who wishes to remain anonymous and / or does not disclose any contact details to us. Providing we have sufficient information, we may still investigate the allegation. If we don't have enough information then we'll log the allegation internally, and it may be used for future reference / decision making / actions, if appropriate.

¹ Sports Leaders UK defines whistleblowers as being: i) current or ex members of staff (both permanent or contracted); ii) third party suppliers of a centre or Sports Leaders UK; iii) current or previous learners

Confidentiality

We will always endeavour to keep your identity confidential where asked to do so, although by law and 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're required by law to disclose your identity
- The Regulator(s) who are responsible for the standards of the qualification(s) concerned.

You should also be aware that you may be identifiable by others due to the nature or circumstances of the disclosure.

We 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, eg to our Regulators and / or the Police or other relevant and / or Statutory Bodies.

Responding to a Whistle-blower disclosure

What will we do when we receive a Whistle-blower disclosure?

We will review the notification and any evidence and determine whether any further action is needed, such as carrying out an investigation. This review period will usually be completed within **20 working days** of receipt of the notification. We will decide whether and how to pursue the issue reported by you. You'll receive an acknowledgement by Sports Leaders UK normally within 5 working days of raising your concern. We will evaluate your concern and may ask you for more evidence / information using the contact details you provided on the Whistleblowing Report Form. We may decide to conduct an initial fact find into your concerns, and we may go on to instigate a formal investigation about the concerns you raise, which would involve us contacting the parties referenced in your form. If we do this, we'll use our internal staff and /or External Contractors who are independent of the centre and /or centre staff concerned. We may inform our Regulator(s) in line with regulator's requirements of the issue raised and the intended course of action to be taken. We will update them, as necessary, at key stages of the investigation

We may also inform other relevant third parties e.g. other Awarding Organisations, the Education and Skills Funding Agency and the Police (if applicable). Upon conclusion of any investigation, we will provide you with a written overall summary of the outcome but cannot share the details of the investigation given our need to protect confidentiality. This will usually be done within **20 working days** of the conclusion of the investigation. We will provide the relevant Regulator(s) with the final outcome of the investigation, and where serious issues are proven, any relevant sanctions imposed by us. Other Awarding Organisations offering the same or similar qualifications may also be informed, in line with our Regulators' requirements.

Key points

Having raised a concern with us there's no need to contact us on a regular basis for updates; we are not required to provide any updates and will inform you of the outcome, at all stages of the matter being investigated, we will take all possible steps to protect your identity given the details/context expressed in the 'Confidentiality' section. We will consider each disclosure of information sensitively and carefully, and decide upon an appropriate response. Information received in a disclosure may be shared with third parties where considered necessary.

How to contact us

To ensure that we have all the correct details and facts please complete the Whistleblowing Report Form, at the end of this policy. If you have already collated evidence to support your allegation please also send this to us when you submit the form. Sports Leaders UK would be happy to discuss your concerns in detail.

If you've any queries about the contents of the policy, please contact Sports Leaders UK, Telephone: 01908 689180 or via email: contact@sportsleaders.org or via post to: 24 Linford Forum, Rockingham Drive, Linford Wood, Milton Keynes, MK14 6LY.

MALPRACTICE AND MALADMINISTRATION REPORT FORM

This form is to be completed on identifying a potential or suspected malpractice and sent to the Compliance Manager at Sports Leaders UK (part of the whistleblowing process).

Name:
Address:
Qualification/Award:
Course Number:
Approved Assessment Centre Name:
Centre Course Manager:
Internal Verifier:
Independent Witness:

1.0 MALPRACTICE OR MALADMINISTRATION

Please complete this section to report a case of suspected malpractice or maladministration.

Details of suspected malpractice:

(If more space is required please continue overleaf or attach additional sheets)

Details of suspected malpractice or maladministration:

(Continued)

Evidence

(please provide details of any evidence that has been collected to support this report)

Reported by:

Reported by:

Position:

Signed:

Date:

Please return this form to the Compliance Manager, 24 Linford Forum, Rockingham Drive, Linford Wood, Milton Keynes, MK14 6LY.