

	<b>POLICY</b>	Document Number: BWPo03
	<b>WHISTLEBLOWING POLICY</b>	Version number: 4 Updated: Feb-2026 Next Review Date: Feb-2028

v.	Latest Amendment Details	Approved by
4.	This policy has been updated to incorporate legislative changes arising from the Employment Rights Act 2025, which are due to come into effect in April 2026	Youth Sport Trust Board (NGR Committee)

## Introduction

The Youth Sport Trust is committed to creating a safe environment and culture of openness in which all those involved in the charity can raise concerns about unacceptable practice, behaviour, and misconduct.

The Youth Sport Trust encourages all individuals to raise any concerns they may have about the conduct of others in the charity or the way in which the charity 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.

The scope of this policy applies to all employees and workers

The Youth Sport Trust is committed to:

- Providing simple and secure mechanisms to raise concerns.
- Investigating concerns promptly and fairly and maintaining objectivity and confidentiality throughout.
- Providing individuals with an opportunity to remain anonymous.
- Recording concerns confidentially.
- Providing the right to be accompanied for any meetings in relation to their concerns.
- Keeping individuals informed throughout the investigations undertaken, where appropriate.

## Whistleblower

The term is commonly used to describe an individual who discloses concerns about wrongdoing, illegal or unethical conduct.

## Concerns covered by the policy

This policy covers actions or omissions which could be illegal, non-compliant with regulatory requirements, contrary to policy or organisational procedures, outside the scope of an individual's authority or which could materially damage the Youth Sport Trust. Examples might include:

- A criminal offence has been committed, is being committed or is likely to be committed.
- Breaches of the Code of Ethics and Codes of Conduct.
- Breaches of the Equality and Diversity Policy.
- Sexual harassment, including where it is alleged that sexual harassment has occurred, is occurring, or is likely to occur.
- Witnessing or being made aware of poor practice and/or a failure to safeguard children, young people and adults.
- Breaches of the Youth Sport Trust Safeguarding Policies and Procedures for children, young people and adults.
- A failure to comply with legal obligations.
- Imminent health and safety risks, including risks to the public as well as other staff and volunteers.
- Damage to the natural environment.
- Risk to an individual's health and welfare.
- Fraud, theft, bribery or corruption.

- Improper or unauthorised use of Youth Sport Trust funds, resources or time.
- Unethical or improper conduct or conduct which breaches Youth Sport Trust policies or procedures, including improper use of authority.
- Slavery, servitude, forced or compulsory labour and/or trafficking in the Youth Sport Trust or its supply chain.
- Where any of the above is being, or is likely to be, deliberately concealed.

Concerns about a third party, such as a supplier or partner of the Youth Sport Trust, should still be reported using the procedure outlined in this policy. The Youth Sport Trust can then contact the third party or take other appropriate action.

### **Reporting concerns**

Concerns should be reported in accordance with the Whistleblowing Process outlined below.

Where a concern relates to sexual harassment, individuals may raise the matter under this Whistleblowing Policy where the disclosure meets the criteria of a qualifying disclosure. The Youth Sport Trust's Dignity at Work, Bullying and Harassment policy should be read alongside this policy.

### **Confidentiality**

The Youth Sport Trust will use its best endeavours to protect an individual's identity if they raise a concern and do not want their identity disclosed. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose an individual's identity. If such circumstances exist, they will be informed.

### **Anonymous reporting**

Individuals are encouraged to provide their names with any disclosures they make. Concerns expressed anonymously may be less credible and will be considered at the discretion of the Youth Sport Trust. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised.
- The credibility of the concern and the evidence available.
- The likelihood of confirming the allegation from attributable sources.

Proper investigation may prove impossible if the Youth Sport Trust cannot obtain further information. It is therefore preferable for those raising concerns to reveal their identity. Measures can then be taken to preserve confidentiality as appropriate.

### **Protection and support for those raising concerns**

"Whistleblowing" legislation aims to protect individuals who feel they have genuine concerns. The Youth Sport Trust is committed to good practice, high standards and ensuring all individuals who raise concerns are supported and treated fairly. In particular:

- Whistleblowers raising matters of concern internally are protected from harassment, victimisation, disciplinary action or dismissal or any other disadvantage at work (even if the disclosure of any wrongdoing or malpractice is not substantiated after investigation), provided issues are raised and disclosed in good faith; and
- The Youth Sport Trust will not tolerate harassment or victimisation and will take such action as is necessary to protect individuals when they raise concerns in good faith under this Policy.

If an individual believes that they are being subjected to a detriment within the workplace as a result of raising concerns under this policy, they should inform the Assistant Director of HR immediately. Staff who victimise or retaliate against those who have raised concerns under this policy may be subject to disciplinary action under the Youth Sport Trust Disciplinary Policy.

The Public Interest Disclosure Act 1998 provides protection for individuals who raise legitimate concerns about specified matters known as qualifying disclosures. A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that a concerning act is being, has been, or is likely to be, committed. The individual has no responsibility for investigating the matter - it is the Youth Sport Trust's

responsibility to ensure an investigation takes place. More information can be found at [Public Interest Disclosure Act 1998 \(legislation.gov.uk\)](https://legislation.gov.uk/Public%20Interest%20Disclosure%20Act%201998).

Qualifying disclosures include criminal offences, breaches of legal obligations, health and safety risks, environmental damage, the concealment of such matters, and disclosures relating to sexual harassment.

### **Right to be accompanied**

Raising concerns can be difficult, particularly those that may relate to fraud. However, an individual is urged to come forward with concerns at an early stage and before suspected problems may become more serious. If it helps, they may come forward with another colleague, to support them when raising a concern. The companion will be asked to respect the confidentiality of the disclosure and any subsequent investigation.

### **Whistleblowing Process**

#### **Reporting concerns**

This process is for disclosures about matters other than a breach of an individual's own contract of employment. If an individual is concerned that their own contract has been, or is likely to be, broken they should use the Youth Sport Trust Grievance Procedure.

#### **Who do I report my concerns to?**

If there is a concern about any activity that an individual witness or is aware of, then this should be raised promptly. This includes not only issues that involve the individual but also others in relation to Youth Sport Trust activities.

Whenever possible concerns should be raised with the individual's line manager. They will work with the individual to address the concern and/or escalate it as appropriate whilst also reporting it to the Youth Sport Trust Assistant Director of HR. If an individual does not have a line manager or does not feel comfortable discussing the concerns with their line manager, they wish to remain anonymous or they believe that their line manager is in some way involved with the concern, they should either contact the Youth Sport Trust Assistant Director of HR directly, or another member of the Youth Sport Trust Senior Leadership Team (SLT), with whom they feel comfortable raising the concerns.

If they are not satisfied with the action that their line manager takes, they can also contact the Youth Sport Trust Assistant Director of HR directly, Helen Shuttleworth – [helen.shuttleworth@youthsporttrust.org](mailto:helen.shuttleworth@youthsporttrust.org)

If the individual/line manager/HR is concerned that a member of SLT is involved in the wrongdoing, they should raise the concern with the Chair of the Youth Sport Trust Board, Neil Davidson – [neil.davidson@youthsporttrust.org](mailto:neil.davidson@youthsporttrust.org)

**NB:** A concern about safeguarding should be raised directly with the Event Safeguarding Lead or Lead Safeguarding Officer at [safeguarding@youthsporttrust.org](mailto:safeguarding@youthsporttrust.org) or 01509 462963.

If the individual is not satisfied with the actions taken, they may write to the Chief Executive Officer or to the Chair of the Youth Sport Trust Board at the Youth Sport Trust head office at SportPark, 3 Oakwood Drive, Loughborough LE11 3QF.

If the individual is not satisfied with the actions taken thereafter, they should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs.
- Financial Conduct Authority.
- Serious Fraud Office.
- Independent Office for Policy Conduct.
- Charity Commission.
- Health and Safety Executive.
- Environment Agency.

## **How are concerns recorded?**

If the individual raised the concern with their line manager, the Youth Sport Trust Assistant Director of HR directly will review this with the line manager as appropriate and undertake any necessary investigation in line with agreed procedures. The Youth Sport Trust Assistant Director of HR directly will acknowledge receipt of the concern and will keep a record of further action taken.

## **Investigating and responding to concerns**

### **Initial response**

Within 10 working days of a concern being received, or sooner if the situation requires, the Youth Sport Trust will respond to the individual raising the concern, directly in writing, to acknowledge that the concern has been received and where applicable:

- Indicate how it proposes to deal with the matter; and /or
- Request additional information.

The individual will also be provided with details of the support available which will include access to counselling facilities.

### **Appropriate action**

The action taken by the Youth Sport Trust will depend on the nature of the concern, the appropriate method of investigation, the skills needed and the nature of evidence required to substantiate the concern. The matters raised may:

- Be investigated internally;
- Be referred to the Police;
- Be referred to the external auditor; and/or
- Form the subject of an independent inquiry.

### **Contact with the individual making the disclosure**

The amount of contact between those people considering the issues and the individual making the disclosure will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided.

So far as the Youth Sport Trust Assistant Director of HR directly considers it appropriate, subject to legal constraints, the individual will be kept informed of the progress of the investigation and whether external authorities have been notified; however, the need for confidentiality may prevent the Youth Sport Trust or an investigator from giving specific details.

If you have acted in good faith in reporting a concern and even if the concern is unproven or unfounded you will be supported, and no action will be taken against you.

### **Disclosures made in bad faith**

If an investigation under this policy concludes that a concern has been raised maliciously, vexatiously, in bad faith or with a view to personal gain, the individual making the disclosure may be subject to disciplinary action under the Youth Sport Trust Disciplinary Policy.

### **Monitoring**

The Youth Sport Trust Assistant Director of HR will be directly responsible for monitoring the outcome of the concerns raised through this Policy and Process.

### **Data Protection**

When an individual makes a disclosure, the Youth Sport Trust will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report, is held securely, and accessed by, and disclosed to, individuals only as necessary for the purposes of dealing with the disclosure.