

SPORT NORTHERN IRELAND

Whistleblowing Policy and Procedures

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LINKED DOCS:	<ul style="list-style-type: none">• Antifraud and Corruption Policy and Procedures• Wrongdoing Procedures• Public Interest Disclosure (NI) Order 1998• Grievances Procedures• Code of Practice• Complaints Procedures
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WHISTLEBLOWING PROCEDURES

This revised Whistleblowing document provides updated guidance on the procedures for reporting, recording and investigating allegations and reported concerns about potential wrongdoing which might be taking place within Sport Northern Ireland (Sport NI).

The document supersedes and replaces the previous Sport NI information policy dated August 2017.

This policy and procedures is designed to support workers who wish to raise concerns and who seek information about the Public Interest Disclosure (Northern Ireland) Order 1998 and avenues for raising their concerns.

Members of the public wishing to raise concerns should refer to Sport NI's Wrongdoing Policy and Procedures.

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Introduction

- 1.1 Sport NI is committed to the highest possible standards of openness and accountability in the delivery of its services. Despite this, concerns about impropriety or malpractice may still arise.
- 1.2 This policy and procedures is designed to support workers who wish to raise concerns and who seek information about the Public Interest Disclosure (NI) Order 1998 and avenues for arising their concerns.
- 1.3 The Public Interest Disclosure (Northern Ireland) Order 1998 provides protection for an individual who makes a qualifying disclosure (also referred to as whistle blowing) in good faith to their employer or other third party against dismissal or detriment for making the disclosure.
- 1.4 Members of the public wishing to raise concerns should refer to Sport NI's Wrongdoing Policy and Procedures.

[Wrongdoing Policy and Procedures.](#)

- 1.5 The purpose of this updated guidance is to ensure that:
 - all concerns are referred to the appropriate person to be recorded and monitored centrally;
 - the most appropriate action is taken, especially in cases that are complex and cover a range of fraud, governance, staffing or service-related issues;
 - action is taken as swiftly as possible following the concern being received; and
 - access to potentially sensitive information/issues is restricted, as far as possible, to preserve confidentiality and protect both the party raising the concern and any parties named in the concern.

Types of concern covered

- 2.1 This guidance relates to concerns about serious malpractice, abuse, neglect or wrongdoing, notably when the interests of others or Sport NI are at risk. Concerns of this nature are likely to involve matters such as unlawful or inappropriate conduct, serious safety or security deficiencies, breaches of confidence or danger to the public or to the environment.
- 2.2 This guidance does not deal with complaints about Sport NI's processes, performance or standards of service, for which separate procedures exist.

[SNI Complaint Procedures](#)

Reporting Concerns: Sport NI Staff

Assurances

- 3.1 Sport NI is committed to taking 'whistleblowing' seriously. If you raise a genuine concern under these arrangements, you will be protected by the Public Interest Disclosure (NI) Order 1998 and will not be at risk of losing your job or suffering any form of retribution. Provided you are acting in good faith, it does not matter if you are mistaken.

[Public Interest Disclosure \(NI\) Order 1998](#)

- 3.2 This assurance does not extend to someone who makes an allegation purely for malicious intent or personal gain. Making allegations of this nature which are found to have no foundation will be regarded by Sport NI as a serious disciplinary offence.

Confidentiality

- 3.3 Sport NI will not tolerate the harassment or victimisation of anyone who raises a genuine concern, and, given these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would initially prefer to speak in confidence to someone in Sport NI. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless we are required to do so by law.
- 3.4 You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In cases where an investigation leads to criminal proceedings, for example, there may be an expectation for you, as a complainant, to give evidence in a court of law. In such cases, we will discuss with you whether and how the matter can best proceed.

Anonymity

- 3.5 Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter, to protect your position, or to give you a response to your concerns. Whilst anonymous reports will be considered, we can apply these Sport NI arrangements more fully if we know who you are and can discuss the matter with you.

How to raise a concern internally

- 3.6 If you have a concern, we hope you will feel able to raise it first with your line manager or your Director. This can be done orally or in writing.

Procedure for Staff who Receive Notification of a Concern

- 4.1 When a concern is raised by a member of staff, you must refer the concern to the Nominated Officer (Director of Finance and Governance) using the Record and Referral Form (Annex A).
- 4.2 Personal grievances or dissatisfaction in respect of employment issues are not considered to be whistleblowing. These matters should be dealt with through other Sport NI HR Policies.

Escalation of a Concern

- 4.3 Although initial contact might be brief, when dealing with a concerned individual you should have a supportive attitude.
- 4.4 If contact is made over the phone or in person you should:
 - record, as fully as possible, what the caller's concern is;
 - explain to the caller that their concern will be handled in accordance with Sport NI's whistleblowing arrangements;
 - clarify if the caller is a member of staff;
 - ask the caller if they wish to leave contact details and if they consent to being contacted to discuss their concerns further. Record contact details if provided and whether the caller consents to be contacted;
 - immediately complete the Record and Referral Form (Annex A) with details of the telephone conversation;
 - immediately inform the Nominated Officer (Director of Finance and Governance) of the nature and detail of the concern. Provide the written record of the call and the Record and Referral Form and advise if the person consented to be contacted or agreed to submit further correspondence.
- 4.5 If contact is made via email or letter you should:
 - immediately on receipt, complete the Record and Referral Form (Annex A) with the date and your name as the officer who received the correspondence;
 - immediately forward the email or letter, with the Record and Referral Form, to the Nominated Officer (Director of Finance and Governance)
- 4.6 If you are a member of Sport NI staff and you need to raise a concern yourself, for whatever reason, you feel that raising a concern with your Line Manager or your Director is not appropriate or has not worked, please raise the matter with one of the officers whose contact details are listed in annex B.

- 4.7 If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.
- 4.8 If you have followed the channels above and you believe there is an ongoing risk, or if you feel the matter is so serious that you cannot discuss it with your Director, you can raise your concern directly with the Chief Executive Officer or the Chair of the Board whose contact details are listed at annex B.
- 4.9 Please remember that you do not need to have firm evidence of malpractice before raising a concern. A suspicion of wrongdoing is sufficient cause to raise a concern. However, we do ask that you explain, as fully as you can, the information or circumstances that give rise to your concern.

Independent advice

- 4.10 If you are unsure whether or how to raise a concern, or if you want confidential advice at any stage, you may contact your trade union. You may also contact the independent charity, Public Concern at Work (Tel: 020 7404 6609 or email whistle@pcaw.org.uk). They can assist with assessing your options and help you raise a concern about malpractice at work. For more information, you can visit their website at www.pcaw.co.uk

Raising your concern outside Sport NI

- 4.11 Sport NI would prefer to hear about your concerns directly, but recognises that there may be circumstances in which staff may instead wish to report a serious concern about wrongdoing to an outside body. Indeed, Sport NI would rather staff raise a matter with the appropriate regulator, such as the Northern Ireland Audit Office, the Ombudsman, or the Health & Safety Executive for Northern Ireland, than not at all.
- 4.12 A list of prescribed persons and bodies to which staff may report a serious concern, with protection afforded by the Public Interest Disclosure (NI) Order 1998, can be accessed via the following link:

[Public Interest Disclosure \(NI\) Order 1998](#)

- 4.13 The Sport NI Code of Ethics outlines the framework within which Sport NI Officers work and details the core values and standards of behaviour which they are expected to uphold.

[Code of Practice](#)

Procedure for Investigations

- 5.1 Concerns may be raised directly with the Nominated Officer or be referred to them by staff or managers using the Record and Referral Form (Annex A). When concerns are raised directly with the Nominated Officer they will complete the Record and Referral Form. The Nominated Officer will determine whether the disclosure

qualifies for protection under the Public Interest Disclosure (NI) Order 1998 and based on preliminary enquiries determine what further action is required. Further action may involve an informal review, an internal inquiry or a more formal investigation.

- 5.2 The Nominated Officer will complete the Reporting Register (annex C) and advise where appropriate the CEO, Audit Chair, NIAO and Department in a manner that safeguards the anonymity of the whistleblower.
- 5.3 Where a formal investigation is considered necessary, the Nominated Officer will meet with the HR Director to assign responsibility for the investigation. Depending on the nature and seriousness of the concern (as identified from preliminary enquiries), the investigation may be referred to the Department's Central Investigations Unit or other independent reviewer.
- 5.4 If the concern is about possible fraud, the investigation will be conducted in line with the Sport NI's Anti Fraud and Corruption Policy.

Informing the Whistleblower

- 6.1 When dealing with your concern, we will tell you who is dealing with the matter, how you can contact him or her, and whether your further assistance may be needed. If you specifically request it, we will write to you summarising your concern and setting out how we propose to handle the investigation of it.
- 6.2 When you raise the concern, you may be asked how you think the matter might best be resolved. If you have any personal interest in the matter, we would ask that you tell us at the outset. If your concern falls more properly within other procedures, eg the Sport NI Grievance Procedure or Sport NI Complaints Procedures, we will tell you.
- 6.3 We will give you as much feedback as we properly can, and, if requested, we will confirm this feedback in writing. However, we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

Records

- 7.1 Records of serious concerns raised by staff, including the outcomes, will be retained by Sport NI in a confidential and secure environment and at a readily identifiable location which will facilitate any required overview of complaints/concerns.

Conclusion

- 8.1 While we cannot guarantee that we will respond to all allegations and reported concerns in the way that individuals might wish, we will strive to ensure that all cases are handled fairly and properly. By using these arrangements, you will help us to achieve this.

Raising Concerns (Whistleblowing) - Record & Referral Form

Please e-mail the completed form to:

Sport NI Nominated Officer (Director of Finance and Governance):

leighbrown@sportni.net

1.	Date concern received
2.	Concern received by
3.	Date referred to Nominated Officer
4.	Contact details of the person raising the concern, if known
5.	Brief outline of the nature of the disclosure
6.	Details of any documents (electronic or hard copy) received with disclosure

To be completed by the nominated officer:

Does the disclosure qualify for protection under the Public Interest Disclosure (NI) Order 1998; YES NO

If yes explain what has occurred, is occurring or is likely to occur

Further action required

Date

Signature

Designated Officers

Contact	Details
Chief Executive	Sport Northern Ireland 2a Upper Malone Road, Belfast, BT9 5LA Tel: 028 9038804 Email: antoinettemckeown@sportni.net
Director of Finance and Governance (Designated Officer) Leigh Brown	Sport Northern Ireland 2a Upper Malone Road, Belfast, BT9 5LA Tel: 028 9038 1222 Email: leighbrown@sportni.net
Chair of Audit & Risk Management Committee Jay Colville	Sport Northern Ireland 2a Upper Malone Road, Belfast, BT9 5LA Tel: 028 9038 1222 Email: jaycolville@sportni.net
Board Chair George Lucas	Sport Northern Ireland 2a Upper Malone Road, Belfast, BT9 5LA Tel: 028 9038 1222 Email: georgelucas@sportni.net
DfC Head of Governance Andrea Orr	Tel: 02890819257 andrea.orr@communities-ni.gov.uk
DfC Head of Corporate Investigations Jacqueline McLaughlin	Tel: 02890819257 jacqueline.mclaughlin@communities-ni.gov.uk

Reporting Register

Date Whistle - blowing Policy approved by ARAC /Board/Issued to staff	Date Policy entered on Internet	Date Training Provided to staff	Whistleblower Anonymous Named or Internal or External Concern	Who has been informed	Date informed	Brief Summary	Ref (If Any)	Type of Concern/allegation	Position/update
By: ARAC Board Issued to staff				e.g Management; FIOG, Board, ARAC, IA, DfC				(e.g. Fraud, Disciplinary etc)	

DfC contact

DfC Head of Governance - Andrea Orr	Tel: 02890819257 andrea.orr@communities-ni.gov.uk
DfC Head of Corporate Investigations Jacqueline McLaughlin	Tel: 02890819257 jacqueline.mclaughlin@communities-ni.gov.uk

