



## Beccles and Sibson Skydivers Whistleblowing Policy

| Amendment | Version | Date | Page | Incorporated<br>By |
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## 1. Policy Statement

Beccles and Sibson Skydivers (sometimes referred to in this document as 'the organisation') is committed to ensuring high standards of conduct in all that it does. For our staff, partners, customers and visitors, these standards are reinforced by our organisational code of conduct. The Code of Conduct is a broad-brush, overarching document which outlines how the organisations members will ensure the health, safety, and wellbeing of all of its members, staff, visitors and customers. This is backed up by British Skydiving's own Code of Conduct. However, wrongdoing can occur. It is important that employees know what to do if, in the course of their work, they come across something that they think is fundamentally wrong, illegal or endangers others within the organisation or the public. The Policy, and Procedure ensures that there are effective arrangements in place so employees feel safe to speak up and will guide employees through the process of raising a concern, which is sometimes referred to as 'blowing the whistle'.

Beccles and Sibson Skydivers seeks to minimise the risk of malpractice and breaches of legislation through the use of this policy. The organisation is committed to best practice and the highest standards of openness, transparency, and accountability in its business affairs.

Therefore, the following principles underpin this policy:

- Employees are encouraged to speak up and raise any concerns they may have about wrongdoing as soon as they notice it;
- Employees raising a concern will be afforded protection as detailed in the Procedure;
- Employees raising a concern will be listened to and treated with respect;
- All concerns will be handled responsibly, professionally and in a positive manner;
- Help and support will be provided to employees where concerns are raised under this policy;
- Managers will be supported in dealing appropriately with concerns which are raised with them.

## 1.2 Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, apprentices, and partners. The policy extends to visitors and customers of Beccles and Sibson Skydivers.

This policy does not cover personal grievances including complaints about employment matters, which will be covered under the Grievance Policy.

What type of concern can be raised?

A concern must be something which affects others such as your work colleagues or the public.

Concerns can relate to matters of policy or misinterpretation of policy or can relate to (but not be limited to) the following when they are carried out either by the organisation, part of the organisation or by an individual(s) in their role or capacity within the Beccles and Sibson Skydivers:

- Criminal offences;
- Unlawful acts;
- Improper and/or unethical behaviour;
- Endangering the health or safety of any individual;
- Miscarriage of justice;
- Financial malpractice, impropriety or fraud;
- Mishandling or risks to data and/or information;
- Failure to comply with a legal obligation;
- Danger to the environment or people;

Deliberate concealment of any of the above.

Furthermore, if an employee is asked to do something, or is aware of the actions of another, which they consider to be fundamentally wrong, illegal, have the potential to endanger others and/or breach the values of the organisational code of conduct, they can raise a concern using the whistleblowing procedure.

## 1.3 Responsibilities

### Directors and Senior Management; -

- Promoting and providing a safe culture and environment where employees and other workers are confident that they can speak up and raise concerns without fear of reproach or recrimination and with the confidence that they will be listened to and supported.
- Ensuring that mechanisms are in place to ensure that the policy and procedure is auditable and fit for purpose.

### Employees, Instructors, Customers and Visitors

- Reporting and pursuing concerns reasonably believed to be in everyone's best interest.
- Raising concerns to the appropriate person in the appropriate way in line with this policy;
- Not raising or pursuing any malicious or vexatious allegations relating to the organisation or colleagues.

## 1.4 Training and Compliance

All staff, permanent and part-time as well as volunteers, coaches and instructors will be made aware of and given full access to this policy and procedure. Information and guidance on 'whistleblowing' will be given to all of the above using the Beccles and Sibson Skydivers employee's 'handbook'. All staff will declare and record their understanding of the policy.

All new members of staff, volunteers, coaches, and instructors will be made aware of the policy and record their understanding.

A Staff training database will capture compliance information in line with the Data Protection Act.

Mark King Operations Manager and Safeguarding Lead

17<sup>st</sup> February 2023

## 2. Beccles and Sibson Skydivers Whistleblowing Procedure

### 2.1 How to raise a concern.

Employees, Instructors, Apprentices, Visitors and Customers should speak up and raise a concern if they suspect wrongdoing.

If an employee, instructor or apprentice experience something in the workplace which they consider to be in conflict with the organisational code of practice and/or perceive to be wrongdoing, it is important that the concern is raised straight away. Proof is not required as this is the organisation's responsibility to acquire. The employee must, however, have a reasonable belief that disclosing the information is in everyone's best interest before raising a concern using this procedure. The following paragraphs outline the different ways in which to raise a concern.

The concern should, in most instances, be raised with the employee's line manager or senior instructor, though it is important that the concern is raised with the person best placed to deal with the matter and with whom the employee feels most comfortable.

There may be certain rare occasions, however, when it would be inappropriate to raise the concern with the line manager because, for example, the concern:

- May implicate the manager in some way;
- Is about a senior manager within the line management chain.
- Is particularly serious and needs to be dealt with as a matter of urgency.

Concerns may also be raised with a more senior manager or Director outside of the line management chain if it is not appropriate to raise the concern with the line manager or the employee feels more comfortable doing so.

### 2.2 Information needed to raise a concern.

When raising a concern under this procedure, an employee should provide the following information where possible:

- The nature of the concern and its key elements;
- When it happened;
- Who was involved.

In addition to details of the concern, an employee should try to provide the following information:

- The background and reason behind the concern;
- Whether they have already raised a concern with anyone and the response;
- Any other relevant dates;
- If applicable, any personal interests must be declared from the outset.

It is important that matters are not investigated by employees themselves. Proof is not needed, just a reasonable, honest belief that wrongdoing, including breaches of the code of conduct, has occurred or is likely to occur.

## 2.3 Procedure for Handling Concerns Raised

All investigations will be conducted sensitively, discreetly, and as quickly as possible. The investigation should be concluded within three months of the matter being raised, though some scenarios may result in a longer timeframe. While the organisation cannot guarantee that the outcome will be as the employee may wish, the matter will be handled fairly and in accordance with the Whistleblowing Procedure.

Once a concern has been raised, the person to whom a complaint has been raised to should arrange a meeting to establish facts and determine how the concern should be taken forward.

If it is established at the meeting that the nature of the concern means the matter would be better dealt with using the Grievance Policy, this will be explained to the employee and the person conducting the meeting must ensure the employee receives the support they need to progress their concern.

Once the nature of the concern has been established, the person conducting the meeting will decide the appropriate person or department to escalate the issue to. This could include senior management, an external governing body such as British Skydiving or in serious circumstances, the HSE or police.

## 2.4 Confidentiality

The best way to raise a concern is to do so openly as this makes it easier for the organisation to investigate and provide feedback. However, the organisation recognises that many people may not express their concerns due to fear of reprisal, worry of not being taken seriously or of being perceived as 'disloyal.'

Any concerns raised under this procedure will be treated in a sensitive manner. The organisation recognises that the employee may want to raise a concern in confidence, i.e. they may want to raise a concern on the basis that their name is not revealed beyond the disclosure route without their consent.

## 2.5 Anonymous Allegations

Employees, instructors, apprentices, and visitors may choose to raise concerns anonymously, i.e. without providing their name at all. Beccles and Sibson Skydivers prefers that allegations are not made anonymously as it enables the matter to be investigated more fully. It is also easier to protect someone raising a concern if the organisation knows their identity. However, this is a matter of choice and depending on the concern raised, there may be the rare occasion where the employee may feel uncomfortable revealing their identity when making an allegation. However, raising a concern anonymously is preferred to silence about potential serious wrongdoing.

If a concern is raised anonymously it will be treated as credible, unless it is obviously a hoax, and investigated so far as possible. The allegation will be considered at the discretion of the senior management. In exercising this discretion factors to take into account would include:

- The seriousness of the concern raised;
- The credibility of the concern; and
- The likelihood of confirming the allegations from an attributable source - that is someone other than the anonymous source.

## 2.6 Protection

- An employee will not be penalised for raising a concern, when using the most appropriate route, where they feel they are being required to act in a way which conflicts with the organisations code of conduct or British Skydiving's own code of conduct.
- This policy seeks to implement the statutory protection, given under the Public Interest Disclosure Act, to workers who raise concerns in accordance with this policy. Beccles and Sibson Skydivers will protect any person who raises a concern in the belief that it is in everybody's interest to do so, from victimisation or reprisals such as being subject to discipline, dismissal, or any other detriment as a result of raising the concern.

- If an employee has been victimised for raising a concern, either during or after the concern has been raised, the organisation will take appropriate action against those responsible, in line with the Disciplinary policy.
- If a concern is raised in the belief that it is in everyone's best interest to do so, but a subsequent investigation confirms this not to be the case then no action will be taken against the employee who has raised a concern.
- If an employee acts in bad faith or raises vexatious, malicious or knowingly untrue concerns in order to harm colleagues or the organisation, this will result in disciplinary action which may lead to dismissal.