



WHISTLEBLOWING POLICY

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1 POLICY STATEMENT

- 1.1 Podium Analytics ("Podium") is an NGO which exists to support the prevention of sports injuries. Podium has a vision to create a safer world of sport, ensuring more people can play sport for longer, and has a clear mission to significantly reduce the incidence and impact of injury in sport.
- 1.2 Podium is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices. This includes creating a safe environment in which all those involved in the charity are able to raise concerns about unacceptable practices and misconduct.
- 1.3 'Whistleblowing' is viewed by Podium as a positive act that can make a valuable contribution to Podium's culture, practices and long-term success. This policy sets out the way in which individuals may raise any concerns that they have about the conduct of others in the charity or the way in which the charity is run, and how those concerns are dealt with.
- 1.4 This policy applies to all employees, trustees, volunteers, contractors and any other individuals performing functions in relation to Podium.
- 1.5 Podium is committed to:
 - Providing a simple and secure process for concerns to be raised;
 - Protecting staff who blow the whistle;
 - Treating all concerns fairly and maintaining confidentiality throughout;
 - Providing individuals with an opportunity to remain anonymous;
 - Providing the right to be accompanied for any meetings in relation to their concerns; and
 - Keeping individuals informed throughout the investigations undertaken, where appropriate.

Version Number	Status	Revision Date	Summary of Changes
2.0	Board approved	December 2020	New policy created

2 CONCERNS COVERED BY THIS POLICY

2.1 This Policy covers actions or omissions which you consider to be illegal, non-compliant with regulatory requirements, contrary to Podium policy, outside the scope of the individual's authority or which could materially damage Podium. Examples may include:

- Conduct which is an offence or a breach of law
- Racial, sexual, disability or other discrimination
- A failure to comply with legal obligations
- Health and safety risks to the public and/or Podium employees
- Damage to the environment
- Safeguarding concerns, including neglect or abuse
- Fraud, theft, bribery or corruption
- Improper or unauthorised use of Podium funds or resources
- Unethical or improper conduct or conduct which breaches Podium policies or procedures, including improper use of authority
- A miscarriage of justice
- Attempts to surpress or conceal any information relating to any of the above

2.2 If you have concerns about a third party, such as a supplier or partner of Podium, you should still report this under the procedure outlined in this policy. Podium can then contact the third party or take other appropriate action.

2.3 This policy is not intended to apply to personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. Such complaints will be dealt with under existing procedures on grievance, bullying, harassment, discipline and misconduct, found either in the staff handbook, the individual's contract of employment, or in the relevant policy.

2.4 Concerns should be reported in accordance with the procedures in this policy.

3 CONFIDENTIALITY, PROTECTION AND SUPPORT

- 3.1 Podium 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 your identity. If such circumstances exist, you will be informed.
- 3.2 Individuals are encouraged to provide their names with any disclosure made. Concerns expressed anonymously may be less credible and will be considered at the discretion of Podium. In exercising discretion, the factors to be taken into account 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
- 3.3 "Whistleblowing" legislation aims to protect individuals who feel they have genuine concerns. Podium is committed to good practice and high standards and is committed to being supportive of anyone who has concerns. In particular:
- 3.3.1 Whistleblowers raising matters of concern internally are protected from harassment, victimisation, disciplinary action or dismissal or any other disadvantage at work (even if your disclosure of any wrongdoing or malpractice is not substantiated after investigation), provided issues are raised and disclosed in good faith; and
- 3.3.2 Podium 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.
- 3.4 If you believe that you are being subjected to a detriment within the workplace as a result of raising concerns under this policy, you should inform the Finance and Business Operations Director immediately. Staff who victimise or retaliate against those who have raised concerns under this policy may be subject to disciplinary action under Podium's Disciplinary Policy.
- 3.5 The law provides protection for workers who raise legitimate concerns about specified matters. These are called "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 worker has no responsibility for investigating the matter - it is Podium's responsibility to ensure an investigation takes place.
- 3.6 Raising concerns can be difficult, particularly those that may relate to fraud. However, you are urged to come forward with concerns at an early stage and before suspected problems may become more serious. If it helps, you may come forward with another colleague, to support you when raising a concern. Your companion will be asked to respect the confidentiality of your disclosure and any subsequent investigation.
- 3.7 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 Podium's Disciplinary Policy.

4 WHISTLEBLOWING PROCESS

- 4.1 If you are concerned about any activity that you witness or are aware of, you should raise your concern promptly. This includes not only issues that affect you but also others in relation to Podium activity.
- 4.2 Wherever possible you should raise concerns with your line manager in the first instance. Your line manager will address your concern and/or escalate it as appropriate.
- 4.3 If you do not feel comfortable raising the issue with your line manager, you wish to remain anonymous, or you believe your line manager is in some way connected to your concern, you should contact Podium's outsourced HR support who will deal with your concern confidentially.
- 4.4 If you are not satisfied with the action your line manager takes, you can contact Podium's outsourced HR support directly.
- 4.5 If you are concerned that a member of the Senior Management Team ("SMT") is involved in any wrongdoing you should raise your concern directly with Podium's outsourced HR support, who is independent of the SMT.
- 4.6 A concern about safeguarding should be raised directly with the Designated Safeguarding Lead.
- 4.7 If you are not satisfied with the action taken, then you should formally raise the issue with the Chief Executive Officer.
- 4.8 If you are not satisfied with the actions taken thereafter you 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
 - The Financial Conduct Authority
 - The Serious Fraud Office
 - The Independent Office for Policy Conduct
 - The Charity Commission
 - The Health and Safety Executive
 - The Environment Agency
- 4.9 This policy is consistent with the Government's Whistleblowing Guidance for Employers and Code of Practice.

5 INVESTIGATING CONCERNS

- 5.1 If you raised the concern with your line manager, they should inform the Finance and Business Operations Director who will review the concern with your line manager as appropriate and undertake any necessary investigation in line with agreed procedures.
- 5.2 If the concern was raised directly with Podium's outsourced HR support, then they will inform the Finance and Business Operations Director of the concern, respecting your right to anonymity if requested.
- 5.3 The Finance and Business Operations Director will inform the Chief Executive Officer and the nominated Trustee of all concerns received in a timely manner.
- 5.4 Any investigation will be conducted sensitively and promptly. Podium will respond to the individual raising the concern within 10 working days, or sooner if required, and they will be informed of the intended timetable for the investigation.
- 5.5 The Finance and Business Operations Director will be directly responsible for any investigation raised through this process.
- 5.6 The action taken by Podium will depend on the nature of the concern, the appropriate method of investigation, the skills needed, and the nature of the evidence required to substantiate the concern. The matters raised may:
 - Be investigated internally
 - Be referred to the police
 - Be referred to the external auditor
 - Form the subject of an independent enquiry
- 5.7 So far as the Finance and Business Operations Director considers it appropriate, subject to legal constraints, you will be kept informed of the progress of the investigation and whether external authorities have been notified. However, the need for confidentiality may prevent Podium from giving you specific details.
- 5.8 A report of all disclosures and subsequent actions taken will be made by the Finance and Business Operations Director. In all cases, the Chief Executive Officer and the nominated Trustee will be required to approve the disclosure report and subsequent actions and will ensure that the outcome is provided to the Trustees. Such reports will be retained for at least six years.
- 5.9 Data collected from the point at which an individual makes a report, is held securely and accessed by, and disclosed to, individuals only as necessary for the purposes of dealing with the disclosure. Any personal data collected will be processed in accordance with the Data Protection Policy.