

Introduction

British Curling is committed to providing the highest level of service to our internal and external partners and customers and to applying the highest standards of quality, probity, openness and accountability. Part of this commitment involves encouraging individuals (whether employees, volunteers, athletes or others with serious concerns regarding any aspect of our work, the conduct of others or the running of our organisation) to report such concerns in confidence and with confidence.

In the majority of cases these concerns or complaints can be dealt with through the existing procedures. However we do recognise that there may be occasions when individuals will want to express concerns of a confidential nature. The aim of this policy is to ensure that all individuals feel able to do this on the understanding that they have nothing to fear and will not suffer reprisals or victimisation.

When we find that there is a problem we will ensure that it is viewed with the seriousness that it deserves and will be dealt with appropriately. We will also pursue fraud and abuse vigorously through our disciplinary procedures, and/or if necessary through the courts. We hope that all individuals will share our sense of what is right and wrong and be confident that we will act on anything that is reported to us in a responsible way.

What is whistleblowing?

Whistleblowing is the term used when a person passes on information about wrongdoing. If you're concerned that any of the things below are happening, have happened or are likely to happen, we encourage you to raise this as soon as possible:

- any bribery, fraud or other criminal offence
- a miscarriage of justice
- a risk to health and safety
- a risk or actual damage to the environment
- a breach of any other legal or professional obligation

You don't need to have any proof that any of these things are happening. As long as you have a reasonable belief, you should report your concerns. But if we find that you've knowingly made a false allegation, we may deal with this under the Disciplinary/Misconduct procedure.

Remember, if you've got a personal complaint or concern, like about how you're being treated as an employee or an athlete, this isn't a whistleblowing matter. It would be covered under the Grievance Procedure, which can be found on the British Curling website.

The British Curling Whistleblowing Policy

We acknowledge that it is not easy to report a concern, particularly one that relates to fraud, corruption or abuse. We urge individuals to come forward with any concerns at an early stage, before the problem has a chance to become serious.

British Curling - Whistleblowing Policy

We are happy for individuals to come forward with a third party for support or alone if they prefer. We will support and protect individuals from reprisal or victimisation. Individuals can be confident that reporting any matter will in no way affect their selection, their career or enjoyment of their job. This also applies if an individual comes forward in good faith and with reasonable belief and, after investigation, it turns out that the matter has genuine and innocent explanation. We will do all we can to respect any request for confidentiality.

If anyone tries to discourage an individual from coming forward with any concerns, this will be treated as a disciplinary offence. This will apply to anyone who expresses criticism or any negative responses and to anyone who harasses, bullies, isolates or victimises individuals in any way after they have come forward.

Before starting down this process, an individual may wish to seek information or advice from Public Concern at Work: www.pcaaw.co.uk or on 0207 404 6609.

Procedure

Stage 1

The individual should request a confidential meeting with the Chief Operating Officer if they are concerned about anything to do with the organisation or their work. If the individual feels that it would not be appropriate to discuss the issue with the Chief Operating Officer, they should bring the matter to the attention of the Chairman.

Stage 2

The Chief Operating Officer (or chairman) will arrange for an investigation into the allegations to be carried out. As far as possible, confidentiality will be respected but there may be occasions where we have no alternative but to take action, which may break that confidentiality. We will ensure however that the individual who has raised the issue is fully informed in advance if possible, of any such action.

In order to ensure fair treatment of all concerned, if someone is potentially being accused of misconduct, our investigation will involve taking statements from those involved. During our investigation, we will respect any fears that the individual who has raised the issue may express about his/her own or their family's physical and/or emotional safety and/or career.

Our investigations may involve other regulatory bodies such as the police, Customs & Excise, the Health and Safety Executive, etc. We would expect the individual who has raised the issue to co-operate fully with all of these outside agencies in assisting with their investigations.

Stage 3

Once the investigation is complete, the Chief Operating Officer (or chairman), along with an appropriate member of the Senior Management team, will agree a course of action. If the

British Curling - Whistleblowing Policy

individual who raised the issue wishes to receive details of the result of the investigation and any proposed action, this information will be provided however, we do have to respect the right to confidentiality of other individuals or the other parties and it may not be possible to provide all the details.

Abuse of the System

If it is discovered that an individual has abused this confidential reporting process and has maliciously or in bad faith or without reasonable belief raised unfounded allegations, British Curling will treat this as a very serious disciplinary matter. In this event the process will be dealt with in accordance with our Disciplinary and Grievance Procedures. Please note that anyone who comes forward in good faith and/or with a reasonable belief has nothing to fear even if it turns out that his or her concerns were unfounded.

Help from External Agencies

The current policies and procedures should allow individuals to express their concerns and have them dealt with without the need to involve any external agencies however we do acknowledge that in exceptional, urgent or emergency circumstances, individuals might feel that it is best to contact an external agency. e.g. If they believe a serious criminal offence has been or is about to be committed, they may wish to call the police, and the policy may thereafter not apply and be dropped.

or

If the problem involves a member of staff, they may wish to raise this directly with the Chair or a Board Member.

An individual may wish to contact Public Concern at Work for confidential and independent advice on: 0207 404 6609, alternatively see www.pcaw.co.uk .

Monitoring the Policy and Procedures

The Chief Operating Officer will actively monitor the Policy and Procedures relating to Whistleblowing. If you have any queries regarding the policy and procedures, please contact the Chief Operating Officer for guidance.

Contacts

Chairman - Willie Nicoll - 07747 007 066 - wn.associates@britishcurling.com

Chief Operating Officer - Bruce Crawford - 07841 880 548 - info@britishcurling.com

Public Concern at Work - 0207 404 6609 - www.pcaw.co.uk