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WELSH SHOOTING

Whistleblowing Policy and Procedures

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Document Overview	
Purpose	• Explain what a Whistleblowing concern is • Encourage individuals to raise concerns at an early stage • Provide clear guidance on how to do so • Ensure concerns are taken seriously and investigated appropriately • Protect those who speak up from any form of retaliation
Applies to:	This policy applies to all individuals associated with Welsh Shooting, regardless of their role or contractual status. This includes Directors, employees, coaches, athletes, volunteers, and any contractors.
Related policies and documents:	Safeguarding Children Policy, Safeguarding Adults Policy, Complaints Policy, Staff Grievance Policy, Disciplinary Policy, EDI Policy, Code of Conduct



1. Purpose and Commitment

Welsh Shooting is committed to maintaining the highest standards of integrity, openness, accountability, and safeguarding across all of its activities. We believe that a culture where individuals feel safe and empowered to speak up is essential to protecting participants, maintaining trust, and ensuring effective governance.

This policy is designed to:

- Encourage individuals to raise concerns at an early stage
- Provide clear guidance on how to do so
- Ensure concerns are taken seriously and investigated appropriately
- Protect those who speak up from any form of retaliation

We recognise that raising concerns can feel difficult, particularly where it may involve colleagues, senior individuals, or sensitive issues such as safeguarding. Welsh Shooting is therefore committed to supporting anyone who raises a concern in good faith and ensuring they are treated fairly and respectfully throughout the process.

No concern is too small, if something does not feel right, individuals are encouraged to raise it.

2. Scope

This policy applies to all individuals associated with Welsh Shooting, regardless of their role or contractual status. This includes employees, coaches, athletes, volunteers (including Directors), and any contractors.

It applies to concerns relating to activities connected with Welsh Shooting, whether those activities take place within formal settings or in broader sporting environments linked to the organisation.

3. Legal Framework

This policy operates in accordance with the Public Interest Disclosure Act 1998 (PIDA), which provides legal protection to individuals who raise concerns about wrongdoing in the public interest.

To qualify for protection, an individual must have a reasonable belief that:

- The information they are raising is true, and
- The concern relates to matters affecting the public interest

Individuals are not required to have evidence or proof, only a genuine and reasonable belief that wrongdoing may have occurred, is occurring, or is likely to occur.



4. What is a Whistleblowing Concern

A whistleblowing concern is a concern about a risk, wrongdoing, or malpractice that goes beyond personal circumstances and may affect others, the organisation, or the wider public.

Examples of concerns that should be raised under this policy include:

- Criminal offences such as fraud, theft, or corruption
- Misuse or mismanagement of funds
- Safeguarding concerns, including abuse, neglect, or harm to individuals
- Breaches of legal or regulatory obligations
- Risks to health and safety
- Serious breaches of equality, diversity and inclusion laws or policies, including discrimination, harassment, victimisation, or systemic unfair treatment of employees, service users, customers, or other stakeholders
- Environmental damage
- Miscarriages of justice
- The deliberate concealment of any of the above

Personal employment concerns, such as dissatisfaction with treatment at work or issues affecting only an individual's own employment circumstances, should normally be raised through the Grievance Policy. However, concerns may be raised under this Whistleblowing Policy where they indicate wider unlawful practices, systemic issues, misconduct, or risks affecting other individuals, the organisation, or the public interest.

5. Speaking Up – How to Raise a Concern

Welsh Shooting encourages individuals to raise concerns as early as possible. No concern is too small, if something does not feel right, it is always appropriate to speak up.

Concerns can be raised in a way that feels most comfortable to the individual, and there is no requirement to follow a single reporting route.

Concerns may be raised with:

- A line manager or supervisor
- The Chief Operating Officer (designated Whistleblowing Officer)
- A member of the Board, including the Chair
- Via the online [Welsh Shooting Whistleblowing Report Form](#).

If the concern involves the Chief Operating Officer, or you feel unable to raise it with them, you should report the concern directly to the Chair of the Board or another nominated Board member.

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Commented [AG3]: Whilst there is a paragraph, below, that states the form can be used when internal channels are not appropriate, the form itself doesn't reiterate this. To improve confidence of use, it would be good to have a stronger statement in the lead paragraph on the form.

For my understanding - who sees the details on the form externally and how do they decide who within the WTSF the contact?



Where an individual does not feel comfortable raising a concern through internal channels—for example, due to concerns about independence or confidentiality, they may use the [Welsh Shooting Whistleblowing Report Form](#) to report the concern anonymously. The Governance and Safeguarding Manager manages the reporting form, undertakes an initial review of reports received, and directs concerns to the appropriate person or authority for consideration.

You may also raise concerns externally with appropriate bodies, depending on the nature of the concern. These may include the NSPCC Whistleblowing Helpline (for safeguarding matters), the Health and Safety Executive, Sport Wales, UK Sport, the Police, or other relevant regulators. Contact details can be found in [Appendix A](#) and guidance can be provided if you are unsure which body is most appropriate.

You do not have to raise a concern internally before contacting an external body, particularly where the matter is serious or you believe it may not be handled appropriately.

Where a concern relates to safeguarding, individuals should raise this immediately with the Governance and Safeguarding Manager or appropriate authority. Safeguarding concerns may require urgent action and may be referred directly to external agencies such as social services or the police.

Concerns may be raised verbally or in writing. While individuals are encouraged to provide as much relevant information as possible (such as dates, context, and supporting detail), this should not prevent concerns from being raised.

6. Anonymity and Confidentiality

Individuals may choose to raise concerns anonymously if they wish. However, it should be recognised that anonymity can make it more difficult for Welsh Shooting to investigate the matter fully and to provide feedback on the outcome.

Where an individual provides their identity, Welsh Shooting will take all reasonable steps to keep this confidential. Information will only be shared with those who need to know in order to investigate the concern and take appropriate action.

There may, however, be limited circumstances, such as legal proceedings, where it becomes necessary to disclose the identity of the individual raising the concern. In such cases, this will be discussed with the individual wherever possible before any disclosure is made.

Individuals are encouraged to provide their identity where they feel able to do so, as this can support a more effective investigation and enable appropriate feedback and support. However, all anonymous disclosures will still be considered carefully and assessed on their merits.

7. What Happens After a Concern is Raised

7.1 Internal Assessment and Investigation



Once a concern is raised, Welsh Shooting will respond in a timely, proportionate, and fair manner.

An acknowledgement will normally be provided within two working days, confirming that the concern has been received and will be reviewed.

An initial assessment will usually take place within five working days to determine the nature and seriousness of the concern, and whether a formal investigation is required.

Where an investigation is necessary, it will be carried out by an appropriately qualified and impartial Investigator. The Chief Operating Officer (or Chair of the Board where the concern involves the Chief Operating Officer) will appoint the Investigator, who must have no actual or perceived conflict of interest in the matter being investigated.

The Board will identify a Whistleblowing Oversight Panel of at least two Board members, none of whom are connected to the matter being considered, to oversee the investigation process, consider findings, and approve recommendations.

Where a concern involves a member of the Board, that individual will take no part in the appointment, oversight, consideration, or determination of the matter.

Concerns regarding the conduct, impartiality, or independence of the Investigator should be raised as soon as reasonably practicable with the Whistleblowing Oversight Panel, which may appoint an alternative Investigator where appropriate.

Where internal independence cannot be assured, consideration will be given to appointing an external investigator.

The scope and method of the investigation will be proportionate to the concern and focused on establishing the facts objectively.

Where possible, investigations will be completed within a reasonable timeframe (typically within 10 to 30 working days depending on complexity). If this is not possible, the individual raising the concern will be kept informed of progress and any delays.

The findings of the investigation will be reported to the Whistleblowing Oversight Panel, which will determine any necessary actions. These actions may include changes to procedures, disciplinary measures, or referral to external authorities.

Where a concern relates to safeguarding, Welsh Shooting's Safeguarding Policy and Procedures will also apply. Safeguarding concerns may require immediate action and, in certain circumstances, may be escalated directly to external agencies such as social services or the police, without completing the full whistleblowing process.

7.2 External Reporting and External Investigations



Where a concern is raised directly with an external regulator, statutory agency, governing body, law enforcement agency, or other authorised organisation, Welsh Shooting will cooperate fully with any enquiries, investigations, or directions issued by that body.

Where permitted, Welsh Shooting will be notified of the concern and take any immediate safeguarding, risk management, or governance actions necessary. The organisation's internal process may be suspended, modified, or limited where doing so could prejudice an external investigation.

Where there is evidence or reasonable suspicion that criminal offences, safeguarding legislation, regulatory requirements, or other legal obligations may have been breached, Welsh Shooting may refer the matter to the relevant statutory, regulatory, or enforcement body.

The organisation will cooperate fully with any external investigation. Where an external body assumes responsibility for investigating a matter, its procedures, powers, and directions will take precedence over this policy. Welsh Shooting may pause, restrict, or adapt its own investigation to avoid compromising any external process.

8. Right to Support

Individuals raising concerns are entitled to support throughout the process. They may choose to be accompanied at meetings by a colleague, trade union representative, or other appropriate person.

Welsh Shooting recognises that raising concerns can be stressful and will seek to ensure that appropriate support is available, such as access to our Governance and Safeguarding Manager, line manager support, or independent advice where appropriate.

The role of a companion or support person is to provide practical and emotional support to the individual raising the concern. They may take notes, confer privately with the individual, and help them present their concerns. The companion is not acting as a representative, advocate, witness, or investigator. Unless agreed by the person chairing the meeting, they may not answer questions on behalf of the individual or otherwise participate directly in discussions.

9. Feedback to the Individual Raising the Concern

Welsh Shooting is committed to keeping individuals informed, while respecting legal and confidentiality constraints.

Where possible, individuals will:

- Receive updates during the investigation process
- Be informed when the investigation has concluded
- Receive a summary of the outcome and any actions taken, where appropriate



In some cases, detailed information cannot be shared, particularly where it relates to other individuals or sensitive matters.

10. Right of Review and Escalation

If an individual is dissatisfied with how their concern has been handled, they have the right to request a review. This review will be conducted by a different senior individual or Board member who has not been involved in the original process.

Requests for review should normally be submitted within 15 working days of notification of the outcome. The reviewer will be appointed by the Chair of the Board or another appropriately authorised individual who has had no prior involvement in the matter and has no actual, potential, or perceived conflict of interest.

A review is not a reinvestigation of the original concern but will consider whether the concern was handled appropriately, whether relevant information was considered, and whether the conclusions reached were reasonable based on the available evidence.

Individuals also retain the right to escalate concerns externally to appropriate bodies if they feel the matter has not been addressed adequately.

11. Protection from Victimisation

Welsh Shooting will not tolerate retaliation, victimisation, or detrimental treatment of any individual who raises a concern in good faith.

This includes protection from:

- Dismissal or disciplinary action
- Loss of opportunities
- Harassment or unfair treatment

Any individual found to have engaged in retaliatory behaviour will be subject to disciplinary action, up to and including dismissal or removal from role.

12. Malicious or Vexatious Concerns

Welsh Shooting encourages all concerns to be raised and recognises that the vast majority of concerns are raised in good faith and will always be considered carefully and fairly.

Welsh Shooting understands that individuals may sometimes be mistaken and no action will be taken against individuals who raise a concern in good faith, even if the concern is ultimately not upheld. A concern will not be considered vexatious or malicious solely because it is unsubstantiated, unfounded, or not upheld.



In rare cases, where there is clear evidence that a concern has been raised without reasonable grounds or with the intention of causing harm or disruption, it may be considered vexatious or malicious. Any such determination will be made cautiously, based on evidence, and at an appropriately senior level. Where appropriate, this may result in disciplinary action.

13. Records and Data Protection

All concerns raised under this policy will be recorded and managed securely. Records will include details of the concern, actions taken, investigation findings, and outcomes.

Welsh Shooting will ensure that all records are handled in accordance with UK data protection legislation, including the UK GDPR. Access to records will be strictly limited to those who require it for legitimate purposes.

Whistleblowing records will be retained for a period of up to 6 years, unless a longer period is required due to legal or safeguarding considerations.

14. Governance and Oversight

Oversight of whistleblowing arrangements is a key governance responsibility. Welsh Shooting will maintain a Board-level oversight mechanism to review whistleblowing activity.

This will include monitoring:

- The number and nature of concerns raised
- The timeliness and effectiveness of investigations
- Any patterns or systemic issues

This oversight helps ensure continuous improvement and reinforces accountability at senior levels.

15. Training and Awareness

Welsh Shooting is committed to promoting awareness of this policy and fostering a positive speak-up culture.

This includes:

- Providing appropriate training to staff, volunteers, and relevant stakeholders
- Ensuring new joiners are made aware of this policy as part of induction
- Encouraging leaders and managers to model open, transparent, and supportive behaviours
- Promoting clear routes for raising concerns through internal communications and guidance



Appendix A – External Whistleblowing Contacts

If you feel unable to raise a concern internally, or believe it has not been dealt with appropriately, you may contact one of the following external organisations depending on the nature of your concern.

Safeguarding Concerns

NSPCC Whistleblowing Helpline

- **Purpose:** Advice and support for reporting concerns about how organisations are safeguarding children
- **Phone:** 0800 028 0285
- **Email:** help@nspcc.org.uk
- **Website:** www.nspcc.org.uk/whistleblowing

Health and Safety Concerns

Health and Safety Executive (HSE)

- **Purpose:** Reporting workplace health and safety risks or failures
- **Website:** www.hse.gov.uk/contact/concerns.htm

Sport Governance / Integrity Concerns

Sport Wales

- **Purpose:** Concerns about governance, safeguarding, or conduct within sport in Wales
- **Website:** www.sport.wales

Anti-Doping Concerns

UK Anti-Doping (UKAD)

- **Purpose:** Reporting concerns relating to doping, prohibited substances, rule violations, or integrity issues in sport
- **Website:** www.ukad.org.uk/report-doping

Criminal Activity

Police (Non-Emergency)

- **Phone:** 101

Emergency Services

- **Phone:** 999
- **When to use:** If someone is in immediate danger or a serious crime is in progress

Other Concerns / General Advice

ACAS (Advisory, Conciliation and Arbitration Service)



- **Purpose:** Free and impartial advice on workplace issues
- **Phone:** 0300 123 1100
- **Website:** www.acas.org.uk

Important Guidance

- You do not have to raise a concern internally before contacting an external body.
- If the concern is urgent or involves risk of harm, you should report it immediately to the appropriate external organisation.
- If you are unsure which organisation to contact, you can seek advice from the NSPCC Helpline or ACAS.

This list is not exhaustive. Individuals may contact any appropriate regulatory or professional body relevant to their concern.



Appendix B - Welsh Shooting – Speak Up Guide

If Something Doesn't Feel Right – Speak Up

At Welsh Shooting, we are committed to creating a safe, respectful, and accountable environment. If you see or experience something that doesn't feel right, it is important to speak up.

No concern is too small.
You will be listened to.
You will be supported.

What Should I Speak Up About?

Raise a concern if you believe something may be wrong, unsafe, or inappropriate, including:

- Safeguarding concerns (harm, abuse, neglect)
- Health and safety risks
- Bullying, harassment, or discrimination
- Fraud, misuse of funds, or dishonesty
- Breaches of rules, laws, or policies
- Attempts to hide wrongdoing

If in doubt, raise it anyway.

Who Can I Speak To?

You can report your concern to:

- Your line manager or coach
- Chief Operating Officer (Whistleblowing Officer)
- A Board member (including the Chair)
- Safeguarding Lead (for safeguarding concerns)

You can also submit a report using our online whistleblowing form:

[Welsh Shooting Whistleblowing Report Form](#).

You can report anonymously if you prefer.

Can I Report Outside Welsh Shooting?

Yes.

You can contact external organisations such as:

- NSPCC Whistleblowing Helpline (safeguarding)
- Health & Safety Executive
- Sport Wales
- UK Anti-Doping
- Police (for serious or criminal matters)

You do not have to report internally first.



What Happens Next?

When you raise a concern:

1. We will acknowledge it quickly
2. We will review and assess it
3. An impartial investigation may take place
4. Action will be taken where appropriate

We will keep you informed where possible.

Safeguarding – Act Immediately

If your concern involves the safety or welfare of a child or adult at risk:

Report it immediately.

Contact the Safeguarding Lead or appropriate authority.

It may be referred directly to social services or the police.

Will My Identity Be Protected?

You can remain anonymous

If you share your identity, it will be kept confidential wherever possible

Will I Be Supported?

Yes.

You can:

- Bring someone with you to meetings
- Access support (for example, our Safeguarding Lead, manager, or adviser)

Will I Get in Trouble?

No, not if you raise a concern in good faith.

You are protected even if:

- You are mistaken
- You do not have full evidence

We take action against anyone who treats someone unfairly for speaking up.

Remember

- Speak up early
- No concern is too small
- You are helping to keep others safe

If you see something, say something.