Whistleblowing and Confidential Disclosure Policy



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 Does this document meet the requirement to age, disability, gender reassignment, m and maternity, race, religion or belief, sex. 	arriage and civil partnership, pregnancy

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1. Introduction

- 1.1. This document is the English Karate Federation Whistleblowing Policy as defined under Public Interest Disclosure Act 1998, which came into force on 2 July 1999. The Act protects workers who disclose information about malpractice at their current or former workplace, provided certain conditions are met. For the purposes of this policy the workplace includes that of English Karate Federation as well as off-site locations related to competition and training camps.
- 1.2. All contractors, members, athletes and other relevant persons within English Karate Federation in any capacity, at one time or another may have concerns about what is happening. It is the duty of everyone to speak up about genuine concerns. These concerns are usually best resolved by having a conversation with their line manager or their Performance Manager in respect of an athlete.
- 1.3. When disclosing a concern, an employee, member, athlete or contractor must reasonably believe two things:
 - I. That they are acting in the public interest; and
 - 2. that the disclosure may fall under one or more of the following headings of malpractice (the list is not exclusive):
 - a criminal offence e.g. fraud;
 - betting, corrupt conduct, inside-information and match fixing;
 - someone's health and safety is in danger e.g. coercion of an athlete to train against medical advice or conducting an unsafe-practice;
 - risk or actual damage to the environment;
 - a miscarriage of justice;
 - an organisation is breaking the law e.g. incorrect or inadequate insurance cover; or
 - covering up wrong doing, such as fabricating test results or supporting cheating (sport rule violation, anti-doping rule violation).
- 1.4. Employees, members, athletes and contractors may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling that it is none of their business or that it is only a suspicion. They may feel that raising the matter would be disloyal to colleagues, managers or to English Karate Federation. They may decide to say something but find that they have spoken to the wrong person or raised the issue in

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the wrong way and are not sure what to do next.

1.5. English Karate Federation takes any form of misconduct seriously and has introduced this policy to enable employees, athletes, contractors and members to raise concerns early and in the right way. We encourage all individuals, where appropriate, to raise the matter as a concern rather than wait for proof.

2. <u>Scope</u>

2.1. The policy applies to all employees, members, athletes and contractors. Personal grievances (e.g. bullying, harassment, discrimination) are not normally covered by this policy, these are covered by the English Karate Federation Disciplinary Code and Complaints Policy.

3. Assurances

3.1. Commitment

- 3.1.1. The English Karate Federation board members are committed to this policy. If a genuine concern is disclosed under it, English Karate Federation will use all reasonable endeavours to protect the position of the individual concerned, provided they are acting in good faith. This assurance does not apply to someone who maliciously, raises a concern that they know is untrue.
- 3.1.2. The daily environment for a English Karate Federation employee, member, athlete or contractor may be challenging following a whistleblowing disclosure, both whilst the disclosure is being investigated and following the conclusion of the process. If the individual feels that his/her environment is not tolerable, discussions should take place with the President, or the Performance Director in respect of an athlete. English Karate Federation will seek to either redeploy that individual, suitably change their environment, or ensure that they are not disadvantaged as a result of making the disclosure.

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3.2. Confidence

- 3.2.1. English Karate Federation does not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that someone may wish to raise a concern 'in confidence'. If any individuals, ask us to protect their identity we will not disclose it without their consent. If the situation develops and English Karate Federation is not able to resolve the concern without revealing their identity (for instance because evidence is required in court), we will consult with the employee, member, athlete or contractor on how they would like to proceed.
- 3.2.2. English Karate Federation recognises that if we do not know the identity of the person disclosing a concern, it may be more difficult to resolve the matter: however, we will always endeavour to balance this with the needs of the individual raising a concern.

4. Procedure

- 4.1. Once English Karate Federation has been made aware of a concern, we will make an initial assessment in order to decide what action should be taken. This may involve: an internal investigation; or an external review/investigation completed by independent experts who are not involved in the operation of English Karate Federation. The person disclosing will then be made aware of who is handling the concern and how they can be contacted and whether they will be required to assist in the future. A Panel will then be formed based on the needs of the case, which will be composed of those who have the knowledge required to fairly assess the disclosure.
- 4.2. English Karate Federation will act as quickly as possible to resolve the matter though the time taken to come to a resolution will depend on the nature of the disclosure. If appropriate and confidentiality allows, the person disclosing may be kept informed though this may not always be possible.
- 4.3. When raising a concern, the employee, member, athlete or contractor may be asked how they feel the matter might best be resolved. At this stage, we must be made aware of any personal interest in the matter. If the concern is deemed to be covered more appropriately by the Disciplinary Code or Complaints Policy, we will make the individual aware and direct them to the policy. Records of disclosures will be kept in accordance with applicable law.

5. Raising a concern internally

- 5.1. Those who have a concern about misconduct would ideally raise it in the first instance with their relevant Line Manager, or Performance Director. This may be done orally or in writing. The person disclosing must state whether they wish to raise the matter in confidence so the appropriate arrangements can be made.
- 5.2. If after following these concerns the person disclosing feels the matter has not been addressed, or if they feel that the matter is so serious that they cannot discuss it with any of

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the above they should contact the President. Where a concern pertains to the President the person disclosing should contact the English Karate Federation Board.

5.3. If the person disclosing is still not satisfied with the decision-making process or the action taken, they can go to the other levels of escalation detailed in this policy (see below).

6. Raising a concern externally

- 6.1. Some professions, such as medicine and nursing, have statutory duties to inform certain categories of disclosure externally. In disclosure cases such as criminal misconduct, child or adults at risk abuse, all employees, members, athletes, and contractors must inform the regulatory authorities without undue delay.
- 6.2. The disclosure process when dealt with internally by English Karate Federation may be duty bound to report this externally to statutory bodies.
- 6.3. Please refer to Appendix 1 for contact information of external bodies.

7. Keeping the English Karate Federation Board informed

7.1. The Disciplinary Officer will notify the President of the English Karate Federation Board when a whistleblowing case has instigated a Panel investigation. Details of the case will not be discussed at that stage. Once the Panel findings are concluded, the English Karate Federation Board will be fully informed, in confidence.

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Appendix A – Contact information for External Bodies

Further information For your information some regulatory statutory bodies are listed below: (<u>https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people- and-bodies--2</u>)

These Regulatory statutory bodies have individual policies and procedures for handling concerns and complaints. Many of their websites contain guidance on issues that you may face which may be helpful in your initial deliberations on whether to make a disclosure.

The Information Commissioner

In relation to compliance with the requirement of legislation relating to data protection and to freedom of information. Email: casework@ico.gsi.gov.uk and the website is www.ico.gov.uk

The Health and Safety Executive

This relates to health or safety of individuals at work or the health and safety of the public that is work-related, in connection with those industries and work activities for which HSE is the enforcing authority. Online form:

http://www.hse.gov.uk/contact/raising-your-concern.htm and the website is www.hse.gov.uk

The National Society for the Prevention of Cruelty to Children (NSPCC) Matters relating to child welfare and protection. Email: <u>help@nspcc.org.uk</u>

Care Quality Commission

Matters relating to the provision of health and social care. www.cqc.org.uk

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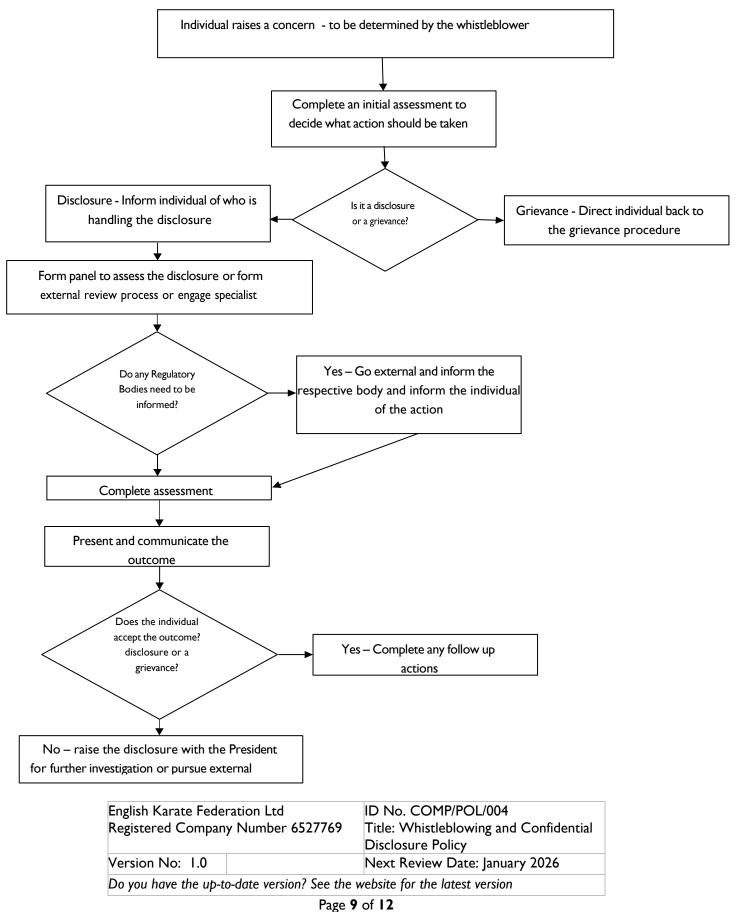
General Medical Council Matters relating to the registration and fitness to practise of a member of the medical profession. www.gmc-uk.org

Health and Care Professions Council

Matters relating to the registration and fitness to practise of health and care professional (eg physiotherapy). www.hpc-uk.org

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Appendix B - Process Flowchart



Appendix C – EKF Values

To help create a great place to work, volunteer and a great place to undertake karate, it is essential that EKF policies and procedures support our values and behaviours. This document, when used effectively, can help promote a culture that is truly respectful and inclusive, where we are compassionate towards each other, and with our ambitious drive we truly support an open, honest and transparent culture.

Organisational values drive the way we influence, how we interact with each other, and how we work together to achieve results. Organisational values are not descriptions of the work we do or the strategies we employ to accomplish our mission, they are the unseen drivers of our behaviour, based on our deeply held beliefs that drive decision-making.

They underpin everything we do and the EKF expects our Members to continue to reflect these values in the way they work – within their Associations, across the Federation and within our communities.

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Appendix D – Eq	uality Im	pact Assessment

Equality Impact Assessment Form					
Department/Function	Compliance				
What is being assessed?	EKF Whistleblowing and Confidential Disclosure Policy				
Date of assessment	January 2025				
	January 2023				
1) What is the impact on the following protected characteristics/groups?					
 Positive: Advance Equality of opportunity Foster good relations betwee different groups Address explicit needs of Equality target groups 	 Unlawful disc harassment / Failure to add needs of Equ groups 	victimisation dress explicit	 Neutral: It is quite acceptable for the assessment to come out as Neutral Impact. Be sure you can justify this decision with clear reasons and evidence if you are challenged 		
Equality Groups	Impact (Positive / Negative / Neutral)	 Comments Provide brief description of the positive / negative impact identified benefits to the equality group. Is any impact identified intended or legal? 			
Race (All ethnic groups)	Neutral				
Disability (Including physical and mental impairments)	Neutral	Policy has been developed to ensure that everybody is treated equally and according to policy regardless of protected characteristics. Reasonable adjustments to the process will be made wherever required.			
Sex	Neutral				
Gender reassignment	Neutral				
Religion or Belief	Neutral				
Sexual orientation	Neutral				
Age	Neutral				
Marriage and Civil Partnership	Neutral				
Pregnancy and maternity	Neutral				
Other (e.g. carers, veterans,	Neutral				
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people from a low socioeconomic background, people with diverse gender identities, human rights)				
2) In what ways does any impact identified contribute to or hinder promoting equality and diversity across the EKF?				
 3) If your assessment identifies a negative impact on Equality Groups you must develop an action plan to avoid discrimination and ensure opportunities for promoting equality diversity and inclusion are maximised. > This should include where it has been identified that further work will be undertaken to further explore the impact 				
on equality groups				
This should be reviewed annually.				
Action Plan Summary				
Action		Lead	Timescale	
N.A		N.A	N.A	

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