



**DURHAM
CRICKET**

Public Interest Disclosure Policy

1st February 2025

Public Interest Disclosure Policy

Durham Cricket at all times endeavours to conduct its business with the highest standards of integrity and honesty. It expects all its employees to maintain the same standards in everything they do. Employees are therefore encouraged to report any wrongdoing by the organisation or its employees that falls short of these business principles, in the first instance, club and events staff to the Chief Operating Officer, and for foundation staff to the Chief Executive Officer.

The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace, but it is the aim of this policy to ensure that as far as possible our employees are able to tell us about any wrongdoing at work which they believe has occurred or is likely to occur.

The organisation recognises that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that the company itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter with the organisation that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.

You are encouraged to use the procedure set out below if you have any concerns at all about wrongdoing at work referred to below.

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, volunteers, casual workers and agency workers.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities.

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- facilitating tax evasion;

- financial fraud or mismanagement;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- safeguarding concerns
- negligence;
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Policy and Procedure.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Chief Operating Officer for club issues, or the Operations Manager for foundation issues.

Raising a whistleblowing concern

An informal approach to your manager will be treated as completely confidential and will not result in any report to anyone within the Club unless you agree.

We hope that in many cases you will be able to raise any concerns with your manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. However, where you prefer not to raise it with your manager for any reason, you should contact the Chief Operating Officer for club issues, or the Operations Manager for foundation issues. If the issue relates to a safeguarding concern it should be raised with the Head of Safeguarding.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every

effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Chief Operating Officer for club issues, or the Operations Manager for foundation issues, and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline.

Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Chief Operating Officer for club issues, or the Operations Manager for foundation issues.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

The organisation undertakes that no employee who makes a *bone fide* report in good faith under this procedure will be subjected to any detriment as a result, in accordance with the Employment Rights Act 1996. In the event that you believe you are being subjected to a detriment by any person within the organisation as a result of your decision to invoke the procedure you must inform the Chief Executive immediately and appropriate action will be taken to protect you from any reprisals.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with in accordance with the terms of the Club's disciplinary procedure.

External disclosures

The organisation is keen to hear any concerns that employees may have about wrongdoing at work and encourages them to use the procedure described wherever possible.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first.

The organisation recognises there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary the Club/Foundation reserves the right to make such a referral without your consent.

In the event that you are unsure whether you should raise an issue under this policy, or you need advice as to how to do so, free confidential advice is available from Protect (telephone 0203 1172520 or by visiting www.protect-advice.org.uk). Protect is a charity with the objective of promoting compliance with the law and good practice and operates a confidential helpline.

If the matter that concerns you is serious and you have exhausted the organisation's internal procedures, or you do not have confidence in the organisation's actions to

investigate the matter, you may contact the appropriate regulating authority relevant to the matter in question (e.g. the Financial Services Authority, Health and Safety Executive etc).