

SPECIAL OLYMPICS GREAT BRITAIN

WHISTLEBLOWING POLICY

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PART I: POLICY DETAILS

1. What does this policy cover, and who is covered?

Contents

This document is the Special Olympics Great Britain ("**Special Olympics GB**") Whistleblowing Policy.

This policy sets out the framework for dealing with allegations of improper conduct both within Special Olympics GB and within its affiliated programmes, clubs or at its events. This policy sets out what Members (as defined below) should do if they have a reasonable belief that wrongdoing or something dangerous, illegal or unethical has happened, is happening or is likely to happen, at work. When you report these kinds of concerns, it is called "whistleblowing".

This policy also covers the actions of third parties such as suppliers, service providers, and clients, as well as Members. If you are concerned about a third party, please raise this concern with us before approaching anyone else. The Director of Operations will be able to explain how you should proceed.

This policy is intended to ensure that Special Olympics GB complies with its duty under the Public Interest Disclosure Act 1998, which came into force on 2 July 1999. This legislation 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 Special Olympics GB, its affiliated programmes, clubs and off-site locations related to competition and events.

Scope

This policy applies to all trustees, employees, contractors, consultants, officers, interns, casual workers and agency workers within Special Olympics GB and Special Olympics GB athletes and registered volunteers ("**Members**").

Personal grievances (e.g. bullying, harassment, discrimination) are not normally covered by this policy. These are covered by the Special Olympics GB Bullying, Discrimination & Harassment Policy/ Complaints Policy / Disciplinary Policy/ Grievance and Mediation Policy.

Introduction

Special Olympics GB is committed to operating at all times, and in everything that it does, to the highest standards of transparency, probity, integrity, and accountability and aims to encourage a culture of openness. Members in any capacity, at one time or another, may have concerns about the conduct of other Members. It is the duty of everyone to speak up about genuine concerns.

Part II of this policy sets out the procedure to be followed to immediately report any concerns about the conduct detailed in section 3 of this Part I, so that Special Olympics GB can take the necessary action to address these concerns as fast and comprehensively as possible.

Special Olympics GB will take appropriate action to protect a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do.

As a whistleblower, you are protected by law. You should not be treated unfairly, lose your job or be subjected to victimisation, discrimination, or harassment because you 'blow the whistle'. Special Olympics GB will act where a whistleblower is treated badly or threatened or has other action taken against them.

If you would like more information about your rights as a whistleblower and how you are entitled to be protected, please see the further information provided in Part III of this policy.

Special Olympics GB takes any form of misconduct seriously and has introduced this policy to enable Members to raise concerns early and in the right way. We encourage all individuals, where appropriate, to raise a matter as a concern rather than wait for proof. There will be no reprisals for individuals who bring genuine concerns to our attention – we value and respect all such reports and those who make them to us.

2. Employment contract

This policy is not part of any employment contract. Special Olympics GB may amend this policy at any time.

3. What sorts of activities are typically considered relevant to whistleblowing?

When disclosing a concern, a Member must reasonably believe two things:

1. that they are acting in the public interest; and
2. that the disclosure may fall under one or more of the headings listed below. This is not an exhaustive list, but the types of concerns that you may want to raise with us by whistleblowing could include:
 - Any activity you suspect is criminal;
 - Any activity you suspect breaches our policy on safeguarding;
 - Any activity you suspect seriously puts health and safety at risk;
 - Any activity you suspect may be fraudulent;
 - Any activity you suspect may damage the reputation of Special Olympics GB;
 - Any activity you suspect breaches our policy on bribery and corruption;
 - Any incidences of sexual harassment;
 - Any activity you suspect may damage the environment;
 - Any activity you suspect may lead to a miscarriage of justice;
 - Any failure to comply with legal or regulatory obligations;
 - Any failure to meet professional requirements; and
 - Any attempt to conceal one or more of these activities.

Please speak to the Director of Operations or Chief Executive (CEO) if you are unsure whether something that you are concerned about is covered by this policy.

4. We protect whistleblowers

Commitment

Special Olympics GB is committed to this policy. If a genuine concern is disclosed under it, Special Olympics GB will use all reasonable endeavours to protect the position of the individual concerned, provided they are acting with the reasonable belief that one or more of the conducts detailed in section 3 of this Part I, has happened, is happening or is likely to happen and that it is in the public interest to make the disclosure, even if an allegation is not substantiated by an investigation.

Special Olympics GB also protects whistleblowers from others, so where a whistleblower reports to us that they have been treated inappropriately by others (including having received threats as a result of raising their concerns), Special Olympics GB will take disciplinary action against those individuals, if required. Consequences could include dismissal for gross misconduct. Whistleblowers may also be entitled to take legal action against those individuals.

Although Special Olympics GB will handle all disclosures in a sensitive and confidential manner, the daily environment for a Member may be challenging following a whistleblowing disclosure, both whilst the disclosure is being reviewed/investigated and following the conclusion of the process. If the individual making the disclosure feels that their environment is not tolerable, discussions should take place with the Director of Operations or the CEO. Special Olympics GB will seek, where possible, to either redeploy that individual, suitably change their environment, or ensure that they are not disadvantaged as a result of making the disclosure.

If, at any time, you do not feel that you have been fairly or properly treated by us in the handling of your whistleblowing concern, you should inform us immediately. You should inform the Director of Operations in the first instance; and if you are not satisfied with the outcome of that conversation, you should follow the procedure set out in our Grievance and Mediation Policy.

Untrue Allegations

Disciplinary action may be taken against a whistleblower who makes an allegation frivolously, carelessly, maliciously or for personal gain.

5. Confidentiality

All allegations will be treated in confidence as far as reasonably possible and Special Olympics GB will endeavour to not disclose a Member's identity without their consent. However, if the situation develops and Special Olympics GB

is not able to resolve the allegation without revealing their identity (for instance, because evidence is required in court, or because a criminal offence has been committed and the matter must be reported to the police), Special Olympics GB will, to the extent reasonable and legally permissible, make every effort to consult the relevant Member on how they would like to proceed.

Subject to this section and any request for anonymity in accordance with sections 6 and 7 of Part I of this policy, Special Olympics GB will not disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation, unless the whistleblower consents.

6. Anonymity

You are always encouraged to raise concerns openly. This is because it is not always easy to manage and to investigate anonymous reports, especially as it is not possible to ask you for clarification or for further details, Special Olympics GB may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion. In these circumstances, Special Olympics GB risk missing evidence or opportunities to gather important supporting information, or identify helpful witnesses.

However, if you prefer to keep your identity anonymous, Special Olympics GB will ensure that you retain your anonymity, and the confidentiality of your concerns, as far as possible, subject to sections 5 and 7 of Part I of this policy.

7. Whistleblowing: external review and/or investigation

Regulators and Statutory Duties

The whistleblowing procedure set out in this policy has been designed to allow Special Olympics GB to resolve concerns internally and to protect any Member raising such concerns as part of this process. However, some professions, such as medicine and physiotherapy, have statutory duties to inform certain categories of disclosure externally.

In some instances, particularly those involving safeguarding, it will be necessary to refer the matter to the Safeguarding Lead internally or an external authority, for example, the police or Local Authority Designated Officer (LADO). If this is the case, both the complainant and, where possible, the person against whom the complaint has been made will be notified of this, unless Special Olympics GB is prohibited from doing so by law or at the direction of the external authority.

Special Olympics GB may be duty bound to report matters externally to statutory bodies. In exceptional circumstances, a Member may wish to involve an external body – an industry regulator, for example. In such situations, the information provided in Part III of this Policy may be consulted.

Involving the press/media

Given that any disclosure is likely to be sensitive, everyone involved in the process should treat the process as confidential. Involving the media in a whistleblowing matter often has the effect of inflaming the situation, not assisting it. It can significantly hamper evidence gathering and the willingness of other relevant individuals to support the process.

PART II: PROCEDURE FOR RAISING A WHISTLEBLOWING CONCERN

Please follow this procedure to report any concerns about the conduct detailed in section 3 of Part I of this policy:

- Raise your concerns with the CEO in the first instance: laura.baxter@sogb.org.uk
- If your concern relates to safeguarding, this should be raised with the Safeguarding Lead in the first instance. You may do so in writing or in person by the following methods:
 - Via email: safeguarding@sogb.org.uk
 - Via telephone: 07383 389663
- If you would prefer not to share your concerns with the CEO or Safeguarding Lead, or consider that your concerns are extremely serious, you should raise your concerns with the Special Olympics GB Chair of Trustees: paul.richardson@sogb.org.uk or the Senior Independent Trustee: andy.young@sogb.org.uk
- Please explain that you are raising your concerns as part of the Special Olympics GB Whistleblowing Policy and Procedure. Then set out all the key facts, including names of those involved and any relevant dates. You must state whether you wish to raise the matter in confidence and/or anonymously so the appropriate arrangements can be made.
- Once Special Olympics GB 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 Special Olympics GB. You will then be made aware of who is handling the concern and how they can be contacted and whether you will be required to assist in the future.
- You may then be invited to a meeting at which you can discuss your concerns if further information is required. If a meeting is required, you are entitled to bring someone with you to this meeting – and any subsequent meetings. That companion may be a colleague (or a trade union representative, if relevant). Anyone who accompanies you will be asked to agree to keep strictly confidential the contents of the meeting including any materials disclosed and/or examined during it. This obligation of confidentiality will extend before, during and after the meeting and any following investigation that we conduct in relation to the concerns raised by you. When raising a genuine concern the person making the disclosure may be asked how they feel the matter might be best resolved.
- Following any initial meeting, Special Olympics GB will investigate the matters raised and we may request that you come to additional meetings to assist us in our efforts.
- Any review/investigation will not, at any stage, be carried out by any person against whom allegations are made, and details will only be shared with those individuals who are considered vital to the effective functioning of any review/investigation.
- The relevant personnel involved in the investigation will keep you informed about the progress of the investigation as far as they are able to do so. For a number of reasons, generally relating to legal obligations, including obligations of confidence, to others, or in relation to any legal advice that Special Olympics GB may decide to take on its own behalf, we may not be able to share every detail of our discoveries or deliberations with you. Special Olympics GB will always endeavor, however, to reassure you, as best as we can, of the fact that we are taking your concerns seriously and that we are conducting a responsible investigation.
- It is possible that the outcome of our investigations will not be one that you find satisfactory. If this happens, you are entitled to complain to the Special Olympics GB Chair of Trustees Paul Richardson via paul.richardson@sogb.org.uk or the Senior Independent Trustee Andy Young via andy.young@sogb.org.uk and request a review of what has been done and concluded.
- Records of disclosures will be kept in accordance with applicable law.

PART III: FURTHER INFORMATION

For your information, some regulatory statutory bodies / whistleblowing charities are listed below:

(<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>)

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.

1. The Information Commissioner

In relation to compliance with the requirement of legislation relating to data protection and to freedom of information.

[Report as a whistleblower | ICO](#) and the website is www.ico.org.uk

2. 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.

[Tell us about a health and safety issue - Contact HSE](#) and the website is www.hse.gov.uk

3. The National Society for the Prevention of Cruelty to Children (NSPCC)

Matters relating to child welfare and protection. Email: help@NSPCC.org.uk Call: 0808 800 5000

4. Care Quality Commission

Matters relating to the provision of health and social care.

www.cqc.org.uk/contact-us/contact-us-online-form and the website is www.cqc.org.uk

5. General Medical Council

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

6. Health and Care Professions Council

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

7. Protect

Protect is the UK's whistleblowing charity. They aim to stop harm by encouraging safe whistleblowing. Their free, confidential Advice Line: 020 3117 2520 (<https://protect-advice.org.uk/advice-line/>) supports more than 3,000 whistleblowers each year who have seen malpractice, risk or wrongdoing in the workplace.