Whistleblowing Policy

BowlsWales · BowlsCymru

Document type	Policy
Version	V3
Last reviewed	June 2026
Next review	June 2028
Approved by	BowlsWales Board
Owner	General Manager

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1. Introduction and Purpose

BowlsWales is committed to setting and upholding the highest possible standards with regard to our corporate governance, behaviour at work, service to members and the general public, and in all our working practices.

To ensure this, BowlsWales encourages employees, volunteers, and representatives to report concerns about poor or dishonest practice, illegal acts, or failures to comply with our required standards of work, without fear of reprisals or victimisation.

This policy provides a safe, transparent, and rapid mechanism under which genuine concerns can be raised internally without fear of repercussions. This policy is non-contractual but represents a statement of BowlsWales policy which will be reviewed regularly and amended as necessary.

2. Scope

This policy and procedure applies to all BowlsWales:

- Employees.

- Board Directors and committee members.
- Volunteers, match officials, and representatives.
- Members and affiliated participants.

3. What is Whistleblowing?

Whistleblowing refers to the disclosure of information about past, current, or anticipated wrongdoing within an organisation. To qualify for legal protection under the Public Interest Disclosure Act 1998 (PIDA) and the Enterprise and Regulatory Reform Act 2013 (ERRA), the disclosure must be made in the public interest — meaning it affects others, the sport, or the wider public, not just the individual making the disclosure.

3.1 Qualifying Malpractice

Malpractice or wrongdoing within BowlsWales taken seriously under this policy includes, but is not limited to:

- Criminal offences (e.g. fraud, bribery, financial mismanagement, or corruption).
- Failures to comply with legal obligations (e.g. operating without appropriate insurance).
- Miscarriages of justice.
- Endangering an individual's health and safety.
- Risk of, or actual damage to, the environment.
- The deliberate concealment or covering up of any of the above matters.

> *Where a disclosure concerns an immediate or specific risk of harm to a child or adult at risk, it must be escalated immediately to the BowlsWales Designated Safeguarding Person (DSP) in line with the BowlsWales Safeguarding Policies and the Wales Safeguarding Procedures, rather than waiting for standard whistleblowing investigation timelines. To report a safeguarding concern, visit bowlswales.com/report-a-concern.*

3.2 Whistleblowing vs Personal Grievances

This policy is not intended for personal grievances, such as disputes regarding employment terms, bullying, discrimination, or harassment, unless the specific circumstances present a wider public interest concern. Personal complaints must be raised through the BowlsWales Grievance Procedure.

4. Protections and Safeguards

4.1 Protection from Detriment and Victimisation

BowlsWales does not tolerate any unfair treatment, harassment, bullying, or victimisation of a whistleblower. Any such conduct by an employee will be treated as gross misconduct

and may result in summary dismissal. Any such conduct by a member or volunteer will result in immediate disciplinary procedures.

If a whistleblower believes they have suffered adverse treatment as a result of making a disclosure, they should report it immediately to the Chair of the Board. The matter will be investigated immediately as a separate disciplinary issue.

4.2 Good Faith and Reasonable Belief

In accordance with the Enterprise and Regulatory Reform Act 2013, a whistleblower is legally protected if they possess a reasonable belief that the disclosure is true and in the public interest. Even if a subsequent investigation finds no evidence of malpractice, no action will be taken against the discloser. However, deliberately raising malicious or knowingly false allegations is a serious disciplinary offence and will be dealt with under BowlsWales disciplinary processes.

4.3 Confidentiality

BowlsWales will make every effort to keep the identity of the whistleblower confidential if requested. However, confidentiality cannot be absolute, as the nature of the investigation may inadvertently signal the source, or disclosure may become necessary if:

- There is a statutory or legal obligation to reveal the identity.
- The information enters the public domain.
- Identification is required by a qualified lawyer for the purpose of legal advice.
- It is fundamentally necessary for the proper progression of a formal investigation.

4.4 Anonymous Disclosures

Individuals are encouraged to put their name to a disclosure to enable a thorough investigation and to allow feedback. Anonymous disclosures will be accepted and evaluated by the receiving officer; however, the organisation's ability to fully investigate, protect the discloser, and report back on outcomes will naturally be restricted.

5. Whistleblowing Procedure

Step 1: Raising the Concern

Any eligible individual who has a genuine concern regarding malpractice should raise it at the earliest opportunity with the Responsible Board Director, or with the Chair of the Board if the concern involves the Responsible Director.

Step 2: Acknowledgement and Initial Review

- The receiving officer will formally acknowledge receipt of the disclosure in writing within 5 working days.

- An initial review will be conducted to determine if the matter falls under the scope of this Whistleblowing Policy or should be routed elsewhere.

Step 3: Investigation

- The Responsible Board Director will appoint an appropriate Investigating Officer, who may be internal or an independent external investigator.
- The Investigating Officer will hold an initial clarification meeting with the whistleblower. If the whistleblower is an employee, they have the right to be accompanied to this meeting by a work colleague or trade union representative.
- The Investigating Officer will aim to complete a comprehensive, confidential investigation within 28 working days. If the complexity of the case requires additional time, the whistleblower will be provided with an update and a revised timeline.
- Secure written records must be kept at every stage of the procedure. These records will be retained confidentially by BowlsWales for five years in compliance with data protection law.

Step 4: Outcome and Actions

Following the investigation, the Investigating Officer will determine the appropriate course of action.

- If malpractice is found: the matter may be reported to the Police, referred for full internal disciplinary proceedings, or escalated to external auditors or specialist investigators. Remedial actions to address the processes that gave rise to the concern must be implemented as soon as possible.
- If no further action is required: the case will be closed if the investigator is satisfied that malpractice has not occurred, the matter is already subject to separate legal or police proceedings, or the discloser did not hold a reasonable belief of malpractice.

The whistleblower will be advised of the outcome of the investigation and subsequent actions taken, subject to legal and confidentiality restrictions regarding third parties.

6. External Disclosures and Prescribed Regulators

While BowlsWales aims to provide the necessary safeguards to resolve matters internally, individuals have a statutory right to raise concerns externally with an appropriate prescribed person (regulator) if they believe an internal route is inappropriate or has failed.

Relevant prescribed bodies include, but are not limited to:

- Natural Resources Wales / Cyfoeth Naturiol Cymru — for environmental matters.
- The Health and Safety Executive (HSE) — for health and safety risks.
- The Information Commissioner's Office (ICO) — for data protection failures.
- The Police — for criminal matters.

7. Governance, Risk and Media Management

The raising of a serious malpractice concern can impact an organisation's continuity and reputation. Therefore:

- Any active whistleblowing investigation must be assessed and reflected appropriately within the BowlsWales Risk Register.
- Media management and external communications following a whistleblowing disclosure will be handled strictly by the Board to protect the integrity of the sport and the privacy of the individuals involved.

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