



WORCESTERSHIRE

COUNTY CRICKET CLUB

Whistleblowing Policy

1. About this policy

1.1 'Whistleblowing' means the reporting of suspected wrongdoing or dangers in relation to Worcestershire County Cricket Club's activities. The aim of this policy is to encourage individuals who have genuine concerns about any aspect of the Club's work or individuals who operate under the Club's jurisdiction, to come forward and voice those concerns.

2. Who this policy applies to

2.1 This policy applies to:

- all Worcestershire County Cricket Club employees;
- all students, interns and agency staff and anyone undertaking work on behalf of Worcestershire County Cricket Club; and
- all partners, stakeholders, players, volunteers and any other parties with interests in the game of cricket in England and Wales.

2.2 This policy is non-contractual and so does not form part of your or an employee's terms and conditions of employment/engagement. The Club may also amend this policy from time to time.

3. General principles

3.1 Worcestershire County Cricket Club is committed to developing a culture where it is safe and acceptable for all individuals who work for and work with the Club, to raise concerns about unacceptable practice and suspected wrongdoing. Any such unacceptable practice or suspected wrongdoing should be reported as soon as possible.

3.2 Worcestershire County Cricket Club operates this policy to enable anyone to raise genuine concerns safely so that such issues are raised at an early stage and in the right way. Worcestershire County Cricket Club is committed to dealing with all genuine concerns raised appropriately, openly, responsibly, and professionally. Any issues genuinely raised under this policy will be viewed as a valuable contribution to the Club's efficiency and long-term success.

4. What is whistleblowing?

4.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers in relation to the Club's activities. Some non-exhaustive examples of this may include:

- criminal activity;
- miscarriages of justice;



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- discrimination related to any protected characteristics;
- danger to health and safety;
- damage to the environment;
- bullying or harassment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- facilitation of tax evasion;
- financial fraud or mismanagement;
- safeguarding concerns;
- negligence;
- breach of our internal policies and procedures;
- conduct likely to damage our reputation, including when using social media;
- unauthorised disclosure of confidential information;
- mistreatment of people in regard to dignity, inclusion and diversity; or
- the deliberate concealment of any of the above matters.

4.2 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 or Dignity at Work policy, as appropriate.

5. Raising a whistleblowing concern

5.1 We hope that in many cases you will be able to, and we encourage you to, raise any concerns with your line manager or Human Resources. You may tell them in person or put the matter in writing if you prefer. You may be able to agree a way of resolving the concern quickly and effectively.

5.2 However, where you feel that your line manager or HR has not addressed the concern, or you prefer not to raise it with them for any reason, you should contact the CEO of the Club.

5.3 We have created a number of ways for you to submit a whistleblowing concern:

- there is a dedicated people email address peoplematters@wccc.co.uk that you can contact;



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- call Human Resources on 07768 487470;
- speak to your line manager or Human Resources in confidence.

5.4 We hope that you will feel able to voice whistleblowing concerns openly under this policy. Although we would prefer you to disclose your identity (as completely anonymous disclosures are difficult to investigate), we understand that for various reasons you may not wish to do so.

5.5 Should you elect to remain anonymous, please note that any action that we have taken to address your concerns may not be apparent to you (see more information in the 'Confidentiality' section below).

6. Process for managing a claim

6.1 Within five working days of your concern being received by Worcestershire County Cricket Club, an investigating manager will be allocated. The investigating manager will respond to you in writing acknowledging that the concern has been received and outlining how the matter is proposed to be dealt with. We may then arrange a meeting with you to discuss the concern. You may bring a work colleague or Trade Union representative to any meetings held under this policy, although companions must respect the confidentiality of disclosures and any subsequent investigations.

6.2 Following on from an initial review of the concern that has been received, a decision will be made by the Club as to whether the matter requires further investigation.

- the investigation may involve you and other individuals involved giving a written statement;
- any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained;
- you may be asked to attend a meeting (or further meetings) to provide further information;
- the investigating manager will then report to the CEO, who will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency;
- if disciplinary action is required, the investigating manager will report the matter to Human Resources who will consider next steps in line with our Disciplinary policy.

6.3 The amount of feedback you will receive relating to the issue will vary depending on the nature and result of the investigations. However, where possible, you will be kept informed of the progress and eventual conclusion of investigations.



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7. External disclosures

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 7.2 The law recognises that in some instances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.
- 7.3 Protect operates a confidential helpline. Their contact details are set out below.

Protect (Independent whistleblowing charity):

Helpline: 0203 117 2520

E-mail: whistle@pcaw.co.uk

Website: www.pcaw.co.uk

8. Safeguards

- 8.1 We recognise that the decision to report a concern is a difficult one to make. At all stages during any ensuing investigation, this will be considered. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 8.2 The Public Interest Disclosure Act 1998 protects whistleblowers from detrimental treatment or dismissal as a result of raising a genuine concern. We will take whatever action is necessary to protect the employee who has raised a genuine concern. If you believe you have suffered any such treatment, you should inform your line manager and/or Human Resources immediately. If the matter is not remedied, you should raise it formally using our Grievance policy.
- 8.3 You must not threaten or retaliate against whistleblowers in any way. Any such behaviour, or any direct or indirect harassment or victimisation will not be tolerated and may result in disciplinary procedures against those concerned.
- 8.4 However, if Worcestershire County Cricket Club concludes that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action under our Disciplinary policy.

9. Accountability

- 9.1 Worcestershire County Cricket Club will take organisational accountability for any whistleblowing concerns raised and in particular will take accountability for:
- poor practice in relation to encouraging the raising of concerns and responding to them; and



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- the victimisation of workers for raising genuine concerns.

9.2 We expect the person raising the genuine concern to take accountability and:

- not raise false concerns in bad faith/for personal benefit; and
- not act with disrespect or other unreasonable behaviour when raising or responding to concerns.

10. Confidentiality

10.1 All concerns will be treated in confidence. During the process of investigating the matter, every effort will be made to keep the identity of the employee raising the concern unknown, except to the minimum number of individuals practicable.

10.2 Although we would prefer you to disclose your identity, you may raise concerns anonymously, or request that your identity is known only to the individual to whom you have reported. Such instances will still be investigated; however, it must be recognised that such a degree of anonymity could hinder the investigation and that in certain situations (such as court or criminal proceedings) anonymity cannot be maintained.

10.3 Employees are themselves bound by confidentiality not to disclose details of such matters to any individuals other than those identified above.

10.4 If you believe that the investigation is not following the procedures outlined in this policy without good reason, then you should where possible discuss your misgivings with the investigating manager concerned. If you are unable to do this, then you should take up your concerns with Human Resources.

11. Receiving a whistleblowing allegation

11.1 Should suspicions be alerted to you as an employee of the Club, via a tip off (usually, but not always, from outside Worcestershire County Cricket Club, you should attempt to obtain the following information from the individual:

- name, address, and telephone number;
- name(s) of individual(s) and organisation(s) involved;
- whether they will submit the evidence; and
- how they became aware of the matter.

11.2 Where the information is received verbally, either in person or via a telephone call, you should record in writing all details, verbatim, if possible, particularly noting dates and times.

11.3 Any permanent evidence, either written or held electronically, should not be altered in any way, either by use of highlighters, underlining, annotating or any other method. Where possible envelopes containing evidence should be retained.



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11.4 You should not attempt to deal with any allegation or suspicion of fraud yourself but should refer them to your line manager. Specifically, do not:

- inform the employee about whom the concern was raised;
- inform any other colleagues;
- commence your own investigation;
- annotate or remove evidence; and/or
- delay in reporting the suspicion. It is imperative that any allegation is passed on and dealt with in the appropriate way.

11.5 It is everyone's responsibility to ensure that whistleblowing allegations are recorded and dealt with appropriately under this policy. If you are in any doubt as to whether you should raise the concern, whether it should be taken seriously or whether this being raised to you means it becomes your responsibility to escalate it, please speak to your line manager.

11.6 If in any doubt, please contact Human Resources.

11.7 Worcestershire County Cricket Club is committed to undertaking a prompt, proportionate, fair and blame free investigation. Where necessary, independent investigators will be used.

12. Other Information

12.1 If you have any questions or require further support, please contact Human Resources who will be happy to help.

13. Related policies

- Disciplinary Policy;
- Grievance Policy;
- Dignity at Work Policy;

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