



✉ superstarsportsuk@gmail.com 🌐 www.superstarsportsuk.com ☎ 023 8212 7331

WHISTLEBLOWING POLICY

1 Policy

1.1 Superstar Sports is committed to the highest standards of openness and accountability. All employees have a right and a duty to report serious concerns about irregularities and unprofessional conduct within the company.

1.2 The aim of this policy is to:

- Deter malpractice and avoid crisis management.
- Help ensure good governance of the Authority and the appropriate and efficient use of its resources.
- Encourage employees to question and act upon concerns about poor practice and to feel confident in raising serious concerns.
- Provide a process for employees to raise concerns.
- Ensure that concerns are addressed promptly and effectively.
- Ensure that employees who raise concerns receive feedback on action taken.
- Provide guidance to employees on how to take matters further if they are not satisfied.
- Reassure employees that they will be protected from possible reprisals or victimisation if they have made the disclosure in good faith, and maintain Superstar Sports good reputation.

1.3 The policy has been designed to operate in accordance with and fulfil Superstar Sports legal obligations in respect to the Public Interest Disclosure Act 1998, which provides special rights for people making disclosures to encourage reporting of malpractice. It provides employees with protection from victimisation and dismissal for making a 'qualifying disclosure'. The Act encourages employees to raise matters internally with their employer in the first instance. Disclosures will be protected if they meet the legal requirements, which generally require the employee to be acting in good faith. This policy applies to all employees, and includes temporary, part time and casual workers.

1.4 Examples of the types of malpractice that should be disclosed include, but are not limited to the following:

- Fraud, corruption and bribery

- Financial irregularities
- Unauthorised use of public funds
- Serious breaches of professional codes of conduct or practice
- A criminal offence
- Endangering an individual's health and safety
- Failure to follow financial or contract service orders
- Conduct which is an offence or a breach of the law
- Miscarriages of justice
- Damage to the environment
- Showing undue favour to a job applicant
- Deliberate concealment of information relating to any of the above
- Other dangers or illegalities which may affect members of the public or Superstar Sports itself
- Other unethical conduct

1.5 The standards expected of Superstar Sports employees are set out in the 'Staff Code of Conduct' and related 'Safeguarding and Child Protection' policies.

1.6 Superstar Sports recognises that the decision to report a concern can be difficult. Employees who believe that there is a serious problem within the company may feel reluctant to express their concerns because they feel that speaking up would be disloyal to their colleagues or to Superstar Sports. They may fear harassment or victimisation. This policy makes it clear that employees have a duty to disclose concerns, in confidence, without fear of subsequent victimisation, discrimination or disadvantage.

1.7 All concerns will be treated in confidence and every effort will be made to preserve the anonymity of the person making the disclosure where necessary. However, at the appropriate time it may be necessary for the person making the disclosure to come forward as a witness, for example, as part of the internal investigation, disciplinary process or legal proceedings.

1.8 Wherever possible, employees are encouraged to put their name to an allegation, as concerns expressed anonymously can be less effective and more difficult to investigate properly.

1.9 Anonymous disclosures will be considered by Superstar Sports, but whether further action is taken will depend on the seriousness of the issues raised and the likelihood of confirming the allegation. This decision will be made by the Company Director in conjunction with the Senior Leadership Team (SLT).

1.10 Superstar Sports will take steps to minimise any difficulties which an employee may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, Superstar Sports will arrange

for advice and support to be provided. Superstar Sports will also consider practical issues such as travel costs and the implications of spending time away from the workplace.

1.11 If an employee makes an allegation in good faith but it is not confirmed by the subsequent investigation, no action will be taken against them. However, if it is found as a result of the investigation that an allegation has been made frivolously, maliciously, or for personal gain, then disciplinary action may be taken against the individual.

1.12 Victimisation or deterring an employee from raising a legitimate concern will constitute serious misconduct and will be addressed under Superstar Sports disciplinary policy.

1.13 The Service recognises that the complainant will need to be assured that the matter has been properly addressed. Due to confidentiality considerations, the complainant may not be informed of the outcomes of any investigation, but will be provided with appropriate information to reassure them that the matter has been addressed.

1.15 SLT is responsible for providing advice and guidance on this procedure, and line managers are responsible for ensuring that all employees have the opportunity to raise concerns under the Whistleblowing procedure, and that any concerns received by them follow the correct procedure.

2 Procedure for raising a concern.

2.1 It is hoped that most concerns can be resolved simply and effectively at the lowest appropriate level within Superstar Sports. This will normally entail employees raising concerns with their line manager. However, this will depend on the seriousness and sensitivity of the issues involved and who is suspected of malpractice. If it is believed that line managers are involved, or the issue can not be resolved at this level, the employee should contact SLT.

2.2 Managers and SLT will need to assess whether the concern raised by the employee falls within the scope of this policy or is to be managed under the Grievance Policy. If the concern falls within the scope of those detailed in Section 1.4, they should be dealt with under this policy.

2.3 However, if this does not resolve the situation, the employee should contact one of the following:-

- Company Director

2.4 Disclosures can be made orally and followed up in writing. They should include the background and history of the concern, including relevant dates, and the reason why the situation gives particular cause for concern, with as much detail as possible. Although employees are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern. This should be made clear when an issue is being raised under the Whistleblowing policy.

2.5 Concerns should be raised as early as possible, as this will make it easier to take action and enable any problems to be resolved quickly. However, it is recognised that some poor practises can develop over a long period of time, delaying the opportunity for disclosure, or could be discovered after they have become well-established. Whilst there is no definite time limit on raising concerns, individuals should make every effort to bring any matters to the attention of Superstar Sports as soon as possible after an event has occurred. Whether an issue can be dealt with after a long period of time will depend on the circumstances. It is more likely that a matter can be addressed if Superstar Sports is aware of it when it is current, or has recently occurred.

2.6 Employees may wish to discuss their concern with a colleague first and may find it easier to raise the matter if there are two (or more) people who have had the same experience or concerns. However, employees should also be prepared to give their own individual account during the investigation process.

2.7 Employees may be accompanied by a colleague or trusted person during any meeting or interviews in connection with the concerns they have raised.

3 Response to disclosures

3.1 Superstar Sports will always respond to concerns raised by employees and the matter will be investigated by management. Further courses of action will vary, depending on the issue, but could include:

- Investigation by the Company Director and SLT, resulting in disciplinary procedure if appropriate, or other formal action.
- Referral to the Police.

3.2 When deciding on whether an investigation is appropriate, and what form this should take, Superstar Sports will consider the public interest as an overriding principle.

3.3 Within ten working days of the concern being raised, the person receiving the disclosure will write to the employee, giving due regard to personal confidentiality of parties involved, to:

- acknowledge that the concern has been received
- indicate how it is proposed that the matter will be dealt with (i.e. whether further investigations will take place, and what form these will take)
- indicate whether any initial enquiries have been made
- give an estimate of how long it will take to undertake any investigation and to reach a conclusion, and supply information on employee support mechanisms.

3.4 The amount of contact between persons considering the issue and the employee who raised the issue will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further

information will be sought from the person making the disclosure, ensuring that confidentiality is maintained as far as possible.

3.5 Investigations into allegations of potential malpractice will not influence, or be influenced by, any disciplinary or redundancy procedures that an employee may already be subject to. However, any allegations of poor practice within the disciplinary procedure itself will only be dealt with through that process (i.e. by invoking the disciplinary appeal procedure).

4 Escalation to external contacts

4.1 This procedure is intended to provide employees with an avenue with which to resolve their concerns internally, but if an employee raising a concern is dissatisfied with the action taken and wishes to take the matter outside of Superstar Sports, the following are examples of appropriate contact points:

External contacts:

- · The Citizens Advice Bureau
- · Public Concern at Work (a national charity that gives advice on 'blowing the whistle')
- · Appropriate professional bodies or regulatory organisations
- · The Police

Full contact details for the above are given in **Appendix A**.

4.4 If the matter is taken outside of Superstar Sports, the employee should ensure that information is not disclosed, such as personal details about colleagues, or restricted financial information. All Superstar Sports policies on the transfer or disclosure of information should be followed. We would expect the individual to inform Superstar Sports in the event that a matter is being raised externally.

4.5 Employees raising a concern externally should consider carefully whether this is the most appropriate course of action for resolving the issue and that all reasonable, possible internal steps have been taken.

Monitoring and Review

This policy will be reviewed annually or following changes in legislation.

Date Reviewed: January 2026

Next Review: September 2026

Whistleblowing Policy - Appendix A

Public Concern at Work (a national	3 rd Floor, Bank Chambers 6-10 Borough High Street, LONDON SE1 9QQ
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charity that gives advice on 'blowing the whistle')	Tel: 020 7404 6609 (answering machine is in use out of hours) UK helpline: helpline@pcaw.co.uk UK enquiries: whistle@pcaw.co.uk UK services: services@pcaw.co.uk
The Citizens Advice Bureau	Customer service: 0808 223 1133 Adviceline (England): 0800 144 8848