



## British Biathlon Union Whistleblowing Policy

All employees, athletes, contractors and members within the British Biathlon Union, at one time or another may have concerns about what is happening. It is the duty of everyone to speak up about genuine concerns. These concerns are usually best resolved by having a conversation with their line manager or the BBU CEO.

When disclosing a concern, an employee, athlete, contractor or 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 following headings of malpractice (the list is not exclusive):
  - a criminal offence e.g. fraud;
  - betting, corrupt conduct, inside-information and match fixing;
  - someone's health and safety is in danger e.g. coercion of an athlete to train against medical advice or conducting an unsafe-practice;
  - risk or actual damage to the environment;
  - a miscarriage of justice;
  - an organisation is breaking the law

There are separate BBU grievance policy for employees and athletes for any grievances that fall outside the above criteria.

Employees, athletes, contractors and volunteers may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling that it is none of their business or that it is only a suspicion. They may feel that raising the matter would be disloyal to colleagues, coaches or to the BBU.

The British Biathlon Union takes any form of misconduct seriously and has introduced this policy to enable employees, athletes, contractors and members to raise concerns early and in the right way. We encourage all individuals, where appropriate, to raise the matter as a concern rather than wait for proof.

Assurances to employees, athletes, contractors and members that The Board of the British Biathlon Union is committed to this policy. If a genuine concern is disclosed under it, the British Biathlon Union will use all reasonable endeavours to protect the position of the individual concerned, provided they are acting in good faith. This assurance does not apply to someone who maliciously, raises a concern that they know is untrue.

The daily environment for a British Biathlon employee, athlete, contractor or member may be challenging following a whistleblowing disclosure, both whilst the disclosure is being investigated and following the conclusion of the process. If the individual feels that his/her



environment is not tolerable, discussions should take place with the CEO or Coach in respect of an athlete. The British Biathlon Union will seek to either redeploy that individual, suitably change their environment, or ensure that they are not disadvantaged as a result of making the disclosure

All should have confidence the British Biathlon Union does not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that someone may wish to raise a concern 'in confidence'. If any individuals ask us to protect their identity we will not disclose it without their consent. If the situation develops and the British Biathlon Union is not able to resolve the concern without revealing their identity (for instance because evidence is required in court), we will consult with the employee, athlete, contractor or member on how they would like to proceed.

The British Biathlon Union recognises that if we do not know the identity of the person disclosing a concern, it may be more difficult to resolve the matter: however, we will always endeavour to balance this with the needs of the individual raising a concern.

### **Whistleblowing Procedure**

Once the British Biathlon Union 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 the British Biathlon Union. The person disclosing will then be made aware of who is handling the concern and how they can be contacted and whether they will be required to assist in the future.

A Panel will then be formed based on the needs of the case, which will be composed of those who have the knowledge required to fairly assess the disclosure. The British Biathlon Union will act as quickly as possible to resolve the matter though the time taken to come to a resolution will depend on the nature of the disclosure. If appropriate and confidentiality allows, the person disclosing may be kept informed though this may not always be possible.

When raising a concern the employee, athlete, contractor or member may be asked how they feel the matter might best be resolved. At this stage, we must be made aware of any personal interest in the matter. If the concern is deemed to be covered more appropriately by the Grievance Procedure we will make the individual aware and direct them to the policy.

### **Raising a Concern Internally**

Those who have a concern about misconduct would ideally raise it in the first instance with their Line Manager, alternatively with the Board of Director. This may be done orally or in writing. The person disclosing must state whether they wish to raise the matter in confidence so the appropriate arrangements can be made. If after following these concerns the person disclosing feels the matter has not been addressed, or if they feel that the matter is so serious



that they cannot discuss it with any of the above they should contact the CEO. If the person disclosing is still not satisfied with the decision making process or the action taken they can go to the other levels of escalation detailed in this policy (see below).

### **Raising a Concern Externally**

Some professions, such as medicine and physiotherapy, have statutory duties to inform certain categories of disclosure externally. In disclosure cases such as criminal misconduct, child or vulnerable adult abuse, all employees, athletes, contractors and members must inform the regulatory authorities without undue delay. The disclosure process when dealt with internally may also require the British Biathlon Union to report this externally to statutory bodies.

### **Keeping the Board of the British Biathlon Union Informed**

The CEO will notify the Chair of the British Biathlon Union when a whistleblowing case has instigated a Panel investigation. Details of the case will not be discussed at that stage. Once the Panel findings are concluded, the Board of the British Biathlon Union will be fully informed, in confidence.

### **Raising a Concern About Malpractice**

The British Biathlon Union is committed to encouraging a culture of openness: to protect its members, to uphold the reputation of the sport, and to maintain the public's confidence.

This policy provides guidance by which serious concerns may be raised within the British Biathlon Union and addressed correctly. Whistle-blowers are witnesses to a malpractice and will be protected for any disclosure of information, and supported by the British Biathlon Union. Examples of malpractice include:

- Breaches of British Biathlon rules, regulations, codes or policies
- Breaches of Safeguarding and Protecting Children, or Adults at Risk Policies;
- Danger to health and safety;
- Breach of the law;
- Bribery;
- Conduct that would cause reputational damage to British Biathlon;
- Complicity including the deliberate concealment of any of the above.

Anyone approaching British Biathlon, in good faith, with information regarding matters of malpractice taking place at a British Biathlon event, will be taken seriously, treated fairly and concerns will be properly considered. It is important that you do report your concerns. British Biathlon recognises that this can be difficult, but whistleblowing will prevent the problem from getting worse, it could protect the individual/s from further harm or risk, and will also ensure that you do not become a party to lack of appropriate action being taken.

Concerns should be raised in the first instance with the following:



Breaches of Safeguarding and Protecting Children, or Adults at Risk Policies – Safeguarding Officer [safeguarding@britishbiathlon.com](mailto:safeguarding@britishbiathlon.com)

Breach of Anti-Doping Rules and Regulations – BBU CEO [info@Britishbiathlon.com](mailto:info@Britishbiathlon.com)

All other concerns should be reported to CEO [info@britishbiathlon.com](mailto:info@britishbiathlon.com)

Where possible confidentiality will be maintained, although it must be stressed that in serious cases it will not always be possible to maintain strict confidentiality if the concerns reach the investigation stage.

Anonymous complaints may not be investigated or acted upon if there is insufficient information to proceed. All concerns will be taken seriously. They will initially be considered by the relevant lead, who will make any preliminary enquiries.

The relevant lead will then decide, on the basis of the information provided:

- Whether or not there is enough evidence to proceed
- Whether to refer for appropriate action under the relevant Policy or Procedure. The relevant lead will advise the Whistle-blower of the outcome of any enquiry and any action taken. In some instances, particularly those involving child safety, doping, or betting, it may be necessary to refer the matter to an external authority, for example the police, NSPCC, UK Anti-Doping or Sports Betting Intelligence Unit. If this is the case both the Whistle-blower and the person against whom the concern has been made will be notified of this, unless British Biathlon is prohibited from doing so by law or at the direction of the external authority.

Any person approaching British Biathlon with genuine concerns will not be disadvantaged or discriminated against in any way because of the disclosure. However, British Biathlon will take a serious view and act accordingly, including taking disciplinary action against appropriate parties, should it be found that the allegations have been raised maliciously.

British Biathlon accepts that it has an obligation to protect Whistle-blowers who make a disclosure in good faith from reprisal or victimisation as a result of the complaint. If a Whistle-blower suffers any adverse treatment as a result of reporting a concern they should submit a formal complaint under the Grievance Procedure. If it is found that a Whistle-blower has suffered adverse treatment, harassment or victimisation as a result of their disclosure disciplinary action will normally be taken against the perpetrator.



## Supporting Organisations

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 or report outside the BBU;

The Biathlon Integrity Unit handles all integrity-related matters in Biathlon, including anti-doping, ethical breaches, betting-related issues and any kind of result manipulation. It protects the integrity of the sport by investigating and prosecuting violations; strengthening the capacity to prevent potential future wrongdoing; and ensuring the International Biathlon Union complies with its obligations under the World Anti-Doping Code, the IBU Constitution and the IBU Rules; <https://www.biathlonintegrity.com/about-us/>

The Information Commissioner In relation to compliance with the requirement of legislation relating to data protection and to freedom of information. Email: [casework@ico.gsi.gov.uk](mailto:casework@ico.gsi.gov.uk) and the website is [www.ico.gov.uk](http://www.ico.gov.uk)

The Health and Safety Executive. This relates to health or safety of individuals at work. Online form: <http://www.hse.gov.uk/contact/raising-your-concern.htm> and the website is [www.hse.gov.uk](http://www.hse.gov.uk)

The National Society for the Prevention of Cruelty to Children (NSPCC) Matters relating to child welfare and protection. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) Care Quality Commission Matters relating to the provision of health and social care. [www.cqc.org.uk](http://www.cqc.org.uk)

General Medical Council Matters relating to the registration and fitness to practise of a member of the medical profession. [www.gmc-uk.org](http://www.gmc-uk.org) Health and Care Professions Council Matters relating to the registration and fitness to practise of health and care professional (eg physiotherapy). [www.hpc-uk.org](http://www.hpc-uk.org)