

BF WHISTLEBLOWING POLICY - FRAUD CORRUPTION AND BRIBERY

Last Updated: 15th March 2017

Last Approved by Board: 14th March 2019

1. INTRODUCTION

This Policy sets out how BF will deal with any Whistleblowing for matters concerning suspected fraud, corruption or bribery.

This Policy should be read in conjunction with the Fraud Prevention Policy, Bribery Policy and the Conflict of Interest Policy.

There is a separate Whistleblowing Policy that relates to Safeguarding concerns and an internal Whistleblowing Policy for staff.

2. THE PURPOSE OF THE POLICY

This policy sets out how British Fencing will handle allegations of fraud, corruption and bribery.

3. RAISING A CONCERN

If you have a concern about British Fencing members of staff, volunteers or board member's conduct on matters concerning suspected fraud, corruption or bribery whilst carrying out British Fencing business, or, if you wish to report any an incident of illegal or wrongful conduct by British Fencing members of staff, volunteers or board member's then you can notify:

- a. If it involves a member of staff then write to the Chief Executive Officer at 1 Baron's Gate, 33-35 Rothschild Road, London W4 5HT marking the envelope private & confidential. Alternatively you can email the CEO at ceo@britishfencing.com tagging the email private & confidential.
- b. If it involves the Chief Executive or a Board Member then write to the Chair at 1 Baron's Gate, 33-35 Rothschild Road, London W4 5HT marking the envelope private & confidential. Alternatively you can email the Chair at chair@britishfencing.com tagging the email private & confidential.
- c. If the matter involves the Chair then write to the Senior Independent Director, 1 Baron's Gate, 33-35 Rothschild Road, London W4 5HT marking the envelope private & confidential.

- d. Alternatively depending on the nature of the concern you may notify a regulator or investigator such as:
- Commissioners for Revenue and Customs
 - Director of the Serious Fraud Office
 - National Crime Agency

Please do not use this process if you have a complaint. There is a separate Customer Complaints Policy which describes how to make a complaint.

Please note British Fencing is not a prescribed regulator for whistleblowing purposes under the Public Interest Disclosure Act 1998.

4. WHAT WE NEED TO KNOW

To help us investigate your concern, please provide as much of the information as possible when you contact us, including

- Whether it is an original concern, or a follow-up to a reply you were not satisfied with
- A clear description of the concern, with supporting evidence
- Details of any relevant information or communications relating to any contact you may previously have had with British Fencing on this subject
- Your full postal address, telephone number (including dialling code), and email address if you have one.

5. WHAT HAPPENS NEXT?

Where you have provided contact details will acknowledge your concern within ten working days.

All notifications and subsequent internal investigations will be conducted professionally, ethically and with discretion. British Fencing will endeavor to protect confidentiality whilst any internal investigation is being completed.

In the event that the concern does not fall under the Whistleblowing Policy we will direct you to the Customer Complaints Policy.

6. WHO CAN RAISE A CONCERN?

Any member of the public or their representatives, staff, businesses, public and voluntary bodies can raise a concern about, or to, British Fencing.

7. CONFIDENTIALITY

All concerns are treated with confidentiality in mind. Only the investigating team will be aware that a concern has been received and is being dealt with. We will respect anonymity, with respect to those raising concerns, but, it is better for the complainant to provide contact details, so that they can be informed of the outcome.

8. EQUALITIES STATEMENT

British Fencing aims to handle all concerns honestly and respectfully regardless of who raises the concern. British Fencing treats all members of the community equitably and will not show bias to any particular individual or group.

9. MATTERS THAT ARE OUTSIDE THIS POLICY

The following matters are not included in this policy:

- Complaints about the services that British Fencing provides
- Complaints which are subject to legal proceedings
- Complaints about member behaviour contrary to the British Fencing Code of Conduct (please see the Disciplinary Policy and Procedure)
- Adult statutory complaints
- Children's statutory complaints

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Version History

Version Number	Date Updated	Updated by	Comments	Approved by Board
Vdraft	15/03/17	GU	Created for review and discussion by Board	04/07/17
V2.1			Reviewed by Board	14/03/2019