



THE BRITISH EQUESTRIAN FEDERATION WHISTLEBLOWING POLICY

21ST REVISION – JANUARY 2025

PURPOSE

The British Equestrian Federation (the “BEF”), in line with its values, is committed to the highest standards of integrity, credibility and accountability. This policy outlines the procedure by which any individual involved at any level of equestrianism (including employees of the BEF) can report, or blow the whistle on, concerns relating to the running of the BEF or the actions or activities of employees, contractors or volunteers of the BEF (including directors of the BEF or BEF committees as listed on the BEF’s website from time to time).

SCOPE

Whistleblowing is a term commonly used to describe the act of reporting any actions or events within an organisation’s control involving danger, risk, malpractice, or wrongdoing. Examples of malpractice or wrongdoing include:

- a criminal offence e.g. fraud;
- misappropriation of funds;
- failure to declare any potential or actual conflict of interest when required to do so by the BEF Rulebook, Terms of Reference, or other BEF policy;
- concerns relating to corrupt conduct by BEF employees, consultants or volunteers e.g. using information obtained through their role at BEF for personal gain/reward;
- BEF employees failing to adhere to company standards and/or policies e.g. gifts & bribery;
- BEF employees or volunteers covering up wrong-doing, such as fabricating test results or supporting cheating (rule violation, anti-doping rule violation);
- improper endangerment to human or equine participant welfare; or
- bullying, harassment or discrimination of others.

The above list is non-exhaustive.

A whistleblower who is categorised as a BEF ‘worker’ may also be protected under English law. The Public Interest Disclosure Act 1998 protects workers who report wrongdoing in defined circumstances within the workplace, for example criminal offences, breaches of legal obligations, dangers to health and safety, bribery, or corruption and the deliberate covering up of matters that may show any of these issues. It is also required that the disclosure must be in the interests of the public. For further information on this, please see www.gov.uk/whistleblowing.

INTERACTION WITH OTHER POLICIES

1) SAFEGUARDING

If your concern relates to welfare, or harm or abuse of young people or adults at risk, reporting concerns to the BEF’s Safeguarding Officer via safeguarding@bef.co.uk or [via our online reporting form may](#) be more appropriate. The BEF Safeguarding Policy and Safeguarding Case Management Process are available in full on the BEF’s website. If in any doubt, report your concerns either via the safeguarding procedure or this whistleblowing policy.

2) EMPLOYEE GRIEVANCES

Separately, if you are an employee of the BEF and you have a complaint or personal grievance relating to your position or personal circumstances, you should refer to the BEF's Grievance Policy available on the staff intranet.

3) INTEGRITY OF EQUESTRIANISM

This whistleblowing policy covers concerns relating to the running of the BEF or the actions or activities of employees, contractors or volunteers working for the BEF. Unless the concerns also involve these groups, this policy does not cover other people or organisations involved in equestrianism, notwithstanding that such entities or persons may have a contractual relationship with the BEF e.g. athletes on the World Class Programme.

Although not covered by this Policy, the BEF encourages both members of the public and Participants in equestrian sport to come forward with information about any wrongdoing in equestrianism, including any conduct that constitutes Prohibited Conduct under the BEF Safeguarding Policy, a breach of our equine welfare rules or policy, or otherwise may constitute a breach of the BEF Rulebook. Please see the relevant policies on our website for details of how to make these reports.

4) MODERN SLAVERY

Please note that the statutory obligations under the Modern Slavery Act 2015 only apply in relation to the BEF with regard to the BEF's own internal business and not the wider industry. If you have concerns regarding modern slavery and/ or human trafficking in relation to the BEF these should be reported via this whistleblowing policy. Similar concerns in relation to the wider industry should be reported to the relevant BEF Member Body directly, the Police or the Modern Slavery Helpline:

- Phone: 0800 0121 700
- Online: www.modernslaveryhelpline.org

WHY REPORT WRONGDOING

The BEF encourages all individuals to raise concerns relating to wrongdoing. This is important to:

- ensure the problem does not get worse;
- ensure the matter is properly investigated;
- protect others; and
- maintain ethical standards and the integrity of the BEF, equestrian sport, and wider equestrian activity.

WHO CAN MAKE A REPORT

Any individual involved at any level of equestrianism (including employees of the BEF) can make a whistleblowing report under this policy.

You may also wish to seek advice from independent charity Protect (previously called Public Concern at Work) which is set up to provide advice and guidance about whistleblowing issues. Please see [further information on their website](#) or by contacting their free helpline on 020 3117 2520.

HOW TO MAKE A REPORT

Should you wish to make a report under this Whistleblowing Policy, you may make a report to the BEF's Integrity Team through any of the following channels:

Via post to: FAO Head of Integrity and HR, British Equestrian Federation, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2RH, marking the envelope 'Private and Confidential'.

Via email to: lynne.bailey@bef.co.uk

The above channels are monitored by the BEF's Integrity Team. In the event your complaint concerns any member(s) of the BEF's Integrity Team or you are otherwise uncomfortable reporting via the above channels, you may alternatively make a whistleblowing report to any of the following persons:

If you are an employee of the BEF: to your line manager.

For anybody making a report: to the Chief Executive of the BEF, contactable via executiveoffice@bef.co.uk or by post via FAO Chief Executive, British Equestrian Federation, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2RH, marking the envelope 'Private and Confidential'.

ESCALATION PROCEDURE

If after reporting concerns in accordance with the above you feel that your concern has not been addressed or that the matter is so serious that you cannot discuss it with any of the above, you may escalate your report:

For anybody making a report: to the Chief Executive of the BEF, contactable by post via FAO Chief Executive, British Equestrian Federation, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2RH, marking the envelope 'Private and Confidential'.

For anybody making a report: to the Chair of the Board of the BEF, contactable by post via FAO Chairman, British Equestrian Federation, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2RH, marking the envelope 'Private and Confidential'.

For anybody making a report: to the Senior Independent Director of the Board of the BEF, contactable by post via FAO Senior Independent Director, British Equestrian Federation, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2RH, marking the envelope 'Private and Confidential'.

PROCESS AFTER A REPORT IS MADE

The BEF is committed to investigating appropriately all reports made under this policy.

If you have provided your identity and contact information with any report, a member of the BEF's Integrity Team (or if you have chosen to report through a different channel, the relevant individual receiving the report) will contact you to confirm receipt of the report and outline the next steps that will be taken.

Usually, the person who receives such a report shall consider its details and then make a decision as to what investigatory team is required to investigate fully the wrongdoing reported (which may comprise an internal or external investigation).

If a report contains allegations against an employee/s of the BEF, this will be dealt with in accordance with the BEF's Disciplinary Procedures in the first instance. If a report contains allegations against a particular individual or team within the BEF, that person or group of

individuals will not be a part of that investigation team or privy to any particular details of such an investigation (although it may be necessary to contact them and disclose certain details in order to investigate the alleged wrongdoing).

If the report is deemed to be covered more appropriately by the BEF's Grievance Procedure or other policy, the person making the report will be informed and directed to the applicable policy.

Once the investigation is complete, any recommendations or remedies required shall be actioned where possible. If any recommendation or action requires the approval of the BEF Board, this shall be requested, and steps shall be taken following the Board's decision.

Where possible, the BEF shall endeavour to keep you updated with ongoing decisions and investigations. If no contact information is provided and a report is made anonymously, it will not be possible for the BEF to contact or update you. Additionally, in certain circumstances it may be possible to share only limited information regarding the outcome of the report with the whistleblower, particularly in the case of individual employment matters or safeguarding matters.

The BEF shall act upon any report as soon as reasonably possible. However, the timescale of any such investigation will be dependent on a broad range of factors which can be case specific, for example, how complex the investigation details are. Notwithstanding this, the BEF will conduct any investigation within a reasonable time period.

CONFIDENTIALITY

It is in the interests of equestrianism that individuals with genuine concerns are able to voice them within a confidential process that leads to effective results. This Whistleblowing Policy outlines the mechanism by which serious concerns can be lodged with the BEF and addressed appropriately.

The BEF will ensure that any person who makes a report in good faith will not be subjected to any detriment as a result.

Should a whistleblower request anonymity, such confidence shall be maintained by the BEF wherever possible. A whistleblower should indicate the need for anonymity as early as possible to avoid any unintended disclosure. However, it may not always be possible to guarantee confidentiality, such as where disclosure is required relating to child protection matters or investigations into crimes such as serious fraud or where the matter requires the invocation of the BEF Disciplinary Procedures.

Disclosure of a whistleblower's identity may be required to external bodies, such as external investigators engaged by the BEF or law enforcement agencies. In these instances, only the minimum number of people required shall be included in any disclosure of identity of the person making the report and, unless prevented by applicable law, the BEF will discuss disclosure with the whistleblower first and be sensitive to any concerns they may have.

It should be noted that in cases where a complaint is made anonymously to the BEF, the investigation may be hindered, and this may limit the efficacy of the process. Therefore the BEF encourages those who wish to make a complaint and ensure it has the maximum effect, to include their contact details with any complaint.

Where a whistleblower wishes to remain anonymous the BEF may still share the information disclosed with the appropriate statutory agencies where the concern involves, or may involve, a criminal offence. In such circumstances, the whistleblower's identity, if known to the BEF, will not be disclosed.

Should a whistleblower be subjected to any prejudice following a report of any wrongdoing, the whistleblower may report such an event in accordance with this policy. The BEF shall begin to investigate such a report promptly. For more information on what to do if you have been treated unfairly after whistleblowing, please go to www.gov.uk/whistleblowing.

Records of whistleblowing reports and investigations will be kept in accordance with applicable law and the BEF's Privacy Policy.

MALICIOUS REPORTS

The BEF encourages those who have concerns to report wrongdoing and an individual should not feel that they need proof or evidence of wrongdoing before making a report. A person making a report in good faith will not suffer detriment.

However, the BEF acknowledges that it is possible that individuals could make malicious or vexatious whistleblowing reports. Where the BEF discovers upon investigation that a report is rooted in malicious personal intention or a report is knowingly dishonest, the BEF reserves the right to take further action, which may include:

- investigating employees of the BEF (making malicious reports may constitute misconduct), which may result in disciplinary proceedings; and/or
- investigating other parties to establish if there has been a breach of the BEF Rulebook or associated policies.

For the avoidance of doubt, no action will be taken against those who make reports in good faith, irrespective of whether the suspicions or allegations reported by the individual prove unfounded.

ADDITIONAL USEFUL CONTACTS

- 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 and the website is www.ico.gov.uk
- The Health and Safety Executive: This relates to health or safety of individuals at work or the health and safety of the public that is work-related, in connection with those industries and work activities for which HSE is the enforcing authority. Online form: <http://www.hse.gov.uk/contact/raising-your-concern.htm> and the website is 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 or the Child Protection in Sport Unit of the NSPCC. www.thecpsu.org.uk
- Care Quality Commission: Matters relating to the provision of health and social care. 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
- 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
- Protect: Protect is the UK's whistleblowing charity. They aim to stop harm by encouraging safe whistleblowing. Their free, confidential Advice Line supports more than 3,000 whistleblowers each year who have seen malpractice, risk or wrongdoing in the workplace.

REVIEW OF THIS POLICY

The BEF shall conduct periodic and qualitative reviews of this Whistleblowing Policy from time to time. It shall evaluate the efficacy of the arrangements and measure the levels of transparency and openness.