



Whistleblowing Policy

Update Record

Month Approved	March 2026
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Approved By	Trustee Board on recommendation from Governance and Finance Committee
Related Policies/Codes	Safeguarding Adults Policy Safeguarding Children Policy Members Code of Conduct Values and Behaviours Complaints and Reporting

Content:

1. Introduction
2. What is Whistleblowing?
3. How do I know if it qualifies for a Whistleblowing Disclosure?
4. How to Raise a Concern
5. How concerns will be handled
- 5.1 Investigation Process and Timescales
6. Charity Commission and Serious Incident Reporting
7. Protection from Retribution
8. Confidentiality
9. Support and Advice
10. Oversight and Culture Building
11. Designated Whistleblowing Officers (DWOs)



1. Introduction

At Lord's Taverners, we are committed to acting with honesty, integrity, and the highest ethical standards. This should be reflected in the way we all work together no matter what your role or connection is with Lord's Taverners.

We recognise, however, that there may be times when things don't go as they should and when this occurs, individuals should use existing policies, codes, values and behaviours complaints and reporting processes as their first step in raising a concern or incident. These can all be found on www.lordstaverners.org However, if an individual has an ongoing genuine and serious concern, these can be raised through whistleblowing, in order to address them appropriately and continue to uphold organisational standards.

Lord's Taverners is committed to creating an inclusive, transparent, and accountable environment where everyone feels safe to raise concerns about wrongdoing. This policy ensures that concerns are heard, investigated fairly, and resolved without fear of reprisal.

This policy is underpinned by our organisational values: We Include, We Empower, We Inspire.

2. What is Whistleblowing?

'Whistleblowing' refers to the act of raising concerns either within the organisation or externally about serious issues such as wrongdoing, illegal activity, or situations where something important may have been overlooked in the workplace. Examples include but are not limited to;

- Misuse of charitable funds or resources
- Safeguarding risks or failures
- Criminal activity or fraud
- Discrimination, harassment, or abuse of power
- Breaches of legal, ethical, or regulatory obligations
- Failure to uphold professional standards or policies
- Conduct likely to have a significant negative effect on the Charity's reputation
- Attempts to conceal any of the above



3. How do I know if my concern qualifies for a whistleblowing disclosure?

Understanding the difference between whistleblowing, reporting a concern/incident about safeguarding or concern/incident about values and behaviours or a personal grievance is essential.

- Whistleblowing concerns significant wrongdoing that affects others or the public interest
- Safeguarding incidents are situations that put an adult or child at risk
- Concerns about behaviours outside of the charities values are reported via the complaints process
- Grievances are personal complaints about your own treatment

Whistleblowing is linked to concerns that may affect beneficiaries, the charity, or the wider public. Examples include but are not limited to;

1. A safeguarding failure involving a child or vulnerable adult
2. The misuse of charitable funds for personal gain
3. The falsifying financial records or expense claims
4. The witnessing and or perpetrating of discriminatory behaviour without taking on the role of active bystander
5. Ignoring health and safety protocols
6. Attempts to cover up misconduct or serious incidents
7. A breach of legal or regulatory obligations (e.g. GDPR, Charity Commission rules)

For employees only, these are examples but not limited to concerns about your own treatment, which **would not be treated as grounds for a Whistleblowing** investigation:

1. You feel unfairly passed over for promotion
2. You are unhappy with your workload or working hours
3. You are unhappy about switching to a different programme slot
4. You have had a disagreement with your line manager
5. You believe your performance appraisal was biased
6. You are experiencing interpersonal conflict with a colleague
7. You are dissatisfied with your pay or benefits

These concerns should be raised through the charities internal policies. As an employee, if you are not sure whether your concern is whistleblowing, a concern or a grievance, speak to the People Team who will help you find the right route without judgement or delay.

4. How to Raise a Concern

Email your concern in writing to;



LORD'S TAVERNERS
Empowering young people through cricket

Whistleblowing only not related to CEO whistleblowing@lordstaverners.org

Whistleblowing related to CEO chair@lordstaverners.org

You can also call 020 7025 0000 and select 0 which is the final option.

Other non-whistleblowing incidents can be reported via other channels as directed by the Lord's Taverners website content on safeguarding and values and behaviours.

If your concern relates to wrongdoing by the Board of Trustees – you may wish to report it to the Charity Commission by calling 0300 066 9197. They may recommend you contact another official organisation, such as the Fundraising Regulator, HMRC, Information Commissioner's Office.

In addition to the Charity Commission, whistleblowers may also report directly to other prescribed persons or bodies under the Public Interest Disclosure Act (PIDA), such as HMRC, HSE, the Information Commissioner's Office, or the Fundraising Regulator. A full list of prescribed persons is available on GOV.UK.

We encourage early reporting. You should describe the reason why the situation gives cause for concern and provide any other relevant context and background. Submitting evidence may enable us to assess your concerns more quickly.

5. How concerns will be handled

When you raise a concern, we will acknowledge it and confirm next steps with you. This might involve asking for more information or arranging a time to speak with you directly.

Once we have carefully considered your concern by means of investigation, we will share what steps we intend to take and explain our reasoning. In some cases, we may not be able to share full details due to confidentiality (see section 8), but we will always aim to be as open as we can.

Where a whistleblowing concern involves third parties, Lord's Taverners may be required to communicate with these as part of an investigation. Any investigation will be proportionate to the level of concern raised.

5.1 Investigation Process and Timescales

All stages will be managed within the timescales stated where practicable.

Stage 1: Acknowledgement (Within 5 working days)

- Written confirmation of receipt
- Initial triage with safeguarding considerations



Stage 2: Preliminary Assessment (Within 10 working days)

- Recipient of whistleblowing concern reviews concern
- Determines scope and next steps

Stage 3: Formal Investigation (Within 20–30 working days)

- Full investigation launched if warranted
- Interviews, document review with legal and/or safeguarding consultation
- Panel review

Stage 4: Decision, Findings and Recommendations (Within 10 working days of investigation close)

- Decision Made
- Report submitted to Board of Trustees
- Remedial actions initiated if necessary

Stage 5: Feedback to Whistleblower (Within 5 working days of Board review)

- Summary of outcome provided
- Support and next steps offered

Total Indicative Timescale: 6–8 weeks. Complex cases may take longer; whistleblowers will be kept informed.

Depending on the nature of the concern, possible outcomes may include:

- No further action being needed
- An internal investigation under this policy
- Action taken under another Lord's Taverners policy
- Referral to the police or another relevant authority
- Referral to a regulator
- Referral to the Charity's external auditors

To uphold impartiality and trust, Lord's Taverners may appoint an external, independent whistleblowing investigator for any formal investigation. This investigator will:

- Operate confidentially and independently of charity management
- Review and, where appropriate, investigate concerns
- Report findings and recommendations to the Board of Trustees
- Ensure whistleblowers are protected throughout the process



6. Charity Commission and Serious Incident Reporting

Where a concern meets the threshold for a serious incident, Lord's Taverners will report it to the Charity Commission in line with regulatory guidance. This policy may be subject to review and revision following any Serious Incident Reports.

7. Protection from Retribution

Lord's Taverners is committed to creating a safe and respectful environment for everyone. We want to reassure you that if you raise a concern in good faith, you will be protected from any form of retaliation.

This means you should not face:

- Victimisation of any sort
- Bullying or harassment
- Being penalised by any means

Any attempt to retaliate against someone for speaking up will be taken very seriously.

8. Confidentiality

Lord's Taverners understands that some people may prefer to raise concerns anonymously. The charity will consider such disclosures, however, sharing your identity can help look into the matter more thoroughly and keep you informed about any outcomes.

If you do choose to share your concerns, please let us know if you'd like your identity to remain confidential. The charity will respect this throughout the process where practicable. In rare cases where we are legally required to disclose your identity (eg if it relates to Safeguarding), we will always aim to let you know beforehand. Anonymous concerns are accepted, though they may limit our ability to investigate. Named disclosures allow us to offer better support and resolution.

All whistleblowing records will be stored securely, with access strictly limited to authorised personnel, to ensure confidentiality and compliance with data protection law.

9. Support and Advice

Lord's Taverners recognises that speaking up can be difficult. You can seek free, independent advice from Protect (Speak Up Stop Harm) <https://protect-advice.org.uk> Protect offers confidential guidance on whistleblowing and your rights under the Public Interest Disclosure Act 1998.



10. Oversight and Culture Building

Lord's Taverners will learn from whistleblowing concerns and embed the learning into the continuous improvement of the charity.

- The Chair of the Board will oversee whistleblowing governance, as strategic governance lead
- Annual anonymised reporting to the Board on disclosures and trends
- Whistleblowing will be included in trustee induction and governance reviews
- Post-investigation “lessons learned” reviews will inform policy updates and training to be delivered
- Whistleblowing policy included in staff and volunteer induction
- Annual “Speak Up Week” to promote awareness and psychological safety

11. Designated Whistleblowing Officers (DWOs)

To ensure independence and trust in the process, Lord's Taverners has Designated Whistleblowing Officers.

These will always be nominated from the Board of Trustees, Senior Leadership Team and Governance & Finance Committee or People and Culture Committee Membership and will rotate on an annual basis where required and practicable.

Officers are responsible for:

- Receiving and handling whistleblowing disclosures sensitively and confidentially.
- Ensuring concerns are triaged, investigated, and escalated appropriately.
- Reporting anonymised data on disclosures and outcomes to the Board of Trustees as part of annual governance reporting, and sooner if a serious issue requires urgent escalation.

This policy will be updated to reflect any future legislative changes to whistleblowing law or employment protections, ensuring continued alignment with statutory requirements and best practice.