

# Esports Wales

## Whistleblowing Policy

**Status:** Board-approved governance policy

**Applies to:** Directors, Committee Members, Officers, Employees, Volunteers, Members, Contractors

**Owner:** Board of Directors

**Review cycle:** Annual

**Next review due:** 12 months from adoption

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### 1. Purpose

1.1 This policy provides a clear framework for **raising concerns about serious wrongdoing, malpractice, or risk** within **Esports Wales CIC** ("the Company").

1.2 It exists to:

- encourage a culture of openness, integrity, and accountability
- enable concerns to be raised safely and responsibly
- ensure concerns are investigated appropriately
- protect individuals who raise concerns in good faith from retaliation

1.3 Whistleblowing is viewed as a **positive and responsible action** that supports the safety, integrity, and long-term success of the Company.

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### 2. Legal Context

2.1 This policy is informed by:

- the **Public Interest Disclosure Act 1998 (PIDA)**
- the **Employment Rights Act 1996**

Policy Number: P0116  
Version Number: 001



Esports Wales CIC: 12372413

2.2 PIDA provides legal protection to workers who make qualifying disclosures in the public interest. While not all individuals covered by this policy are “workers” under PIDA, the Company commits to applying the same principles of protection and fairness wherever possible.

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### **3. Scope**

#### 3.1

This policy applies to:

- Directors and Committee members
- employees and volunteers
- Members and officials
- contractors, suppliers, and partners

#### 3.2

It covers concerns relating to activities connected to the Company, whether in Wales, the UK, or internationally.

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### **4. What Is Whistleblowing?**

4.1 Whistleblowing is the disclosure of information that the individual reasonably believes shows wrongdoing or risk, including (but not limited to):

- criminal offences
- fraud, bribery, or corruption
- misuse of funds or assets
- breaches of legal or regulatory obligations
- safeguarding failures
- health and safety risks
- unethical or improper conduct



- deliberate concealment of any of the above

4.2 It is **not necessary** for the individual to prove the concern—only that it is raised in good faith.

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## 5. What This Policy Does Not Cover

5.1 This policy does **not** cover:

- safeguarding concerns (which must follow safeguarding procedures)
- personal employment grievances
- complaints about service delivery or competition matters
- disciplinary matters covered by other procedures

5.2 Such matters will be redirected to the appropriate policy.

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## 6. Safeguards & Protection

6.1 The Company is committed to:

- protecting whistleblowers from victimisation, retaliation, or detriment
- treating all concerns seriously and confidentially

6.2 No individual will be disadvantaged for raising a concern in good faith, even if the concern is not ultimately upheld.

6.3 Malicious or knowingly false allegations may result in governance or disciplinary action.

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## 7. How to Raise a Concern

### 7.1 Internal Reporting Routes

Concerns may be raised:

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- to the **Chief Executive Officer**
- to the **Chair of the Board**
- to the **Company Secretary**

7.2 If the concern relates to the CEO, it should be raised with the **Chair**.  
If the concern relates to the Chair, it should be raised with the **Vice-Chair**.

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### **7.3 How to Make a Disclosure**

Concerns may be raised:

- verbally or in writing
- anonymously (though this may limit investigation)

Individuals should provide as much information as possible, including:

- the nature of the concern
  - relevant dates, locations, or individuals
  - any supporting evidence (if available)
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## **8. Handling Whistleblowing Reports**

8.1 All disclosures will be:

- acknowledged promptly
- assessed impartially
- investigated proportionately

8.2 The Company may:

- appoint an independent investigator
- establish a small review panel



- seek external professional advice

8.3 Conflicted individuals shall take no part in handling the concern.

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## **9. Outcomes & Feedback**

9.1 Possible outcomes include:

- no further action
- corrective or preventative action
- governance, disciplinary, or regulatory referral

9.2 The whistleblower will be informed of the outcome as far as confidentiality and legal constraints allow.

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## **10. External Disclosure**

10.1 Where appropriate, concerns may be raised externally to prescribed bodies, including regulators.

10.2 Individuals are encouraged to raise concerns internally first, unless:

- they reasonably believe this would be inappropriate
  - the concern is exceptionally serious
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## **11. Confidentiality & Data Protection**

11.1 All whistleblowing disclosures shall be handled:

- sensitively
- confidentially



- in accordance with data protection legislation

11.2 Information will be shared strictly on a need-to-know basis.

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## 12. Records & Reporting

12.1 The Company shall maintain confidential records of:

- disclosures received
- actions taken
- outcomes and learning

12.2 Anonymised, high-level reporting may be provided to the Board to support governance improvement.

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## 13. Review & Monitoring

13.1 This policy shall be reviewed:

- annually
  - following any significant whistleblowing case
  - following changes in law or governance requirements
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## 14. Adoption

14.1 This Whistleblowing Policy was approved by the Board of Directors of **Esports Wales CIC**.

**Date approved:** \_\_\_\_02/03/2026\_\_\_\_

**Signed (Chair):** \_\_\_\_  \_\_\_\_

