



Whistleblowing Policy and Procedures

1. Introduction

- 1.1 Whistleblowing encourages and enables employees to raise serious concerns within the Club rather than overlooking a problem or 'blowing the whistle' outside.
- 1.2 Whistleblowing in a safeguarding context means revealing and raising concerns over misconduct or malpractice within an organisation, or within an independent structure associated with it. It can be used as an early warning system or when it's recognised that appropriate actions have not been taken.
- 1.3 Employees are often the first to realise that there is something seriously wrong with the Club. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the Club.

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2. Our Commitment

2.1 The Club is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we expect employees, and others that we deal with, who have serious concerns about any aspect of the Club's work to come forward and voice those concerns.

3. Scope

3.1 This policy applies to all individuals associated with Lancashire Cricket Club, including but not limited to:

- All employees, whether permanent, temporary, or casual
- Volunteers and contractors working on behalf of the organisation
- Coaches, officials, and support staff
- Players and participants in any programs, teams, or events organised by the organisation
- Third-party service providers engaged by the organisation

This policy is binding on all individuals regardless of their role, status, or location when representing or participating in activities related to Lancashire Cricket Club.

4. Aims of the Policy

4.1 To encourage employees to feel confident in raising concerns and to question and act upon concerns about practice.

4.2 To provide avenues for employees to raise concerns in confidence and receive feedback on any action taken.

4.3 To ensure that an employee receives a response to your concerns and that you are aware of how to pursue them if you are not satisfied.

4.4 To reassure employees that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made a disclosure in good faith.

5. Type of concern covered.

- Conduct which is an offence or a breach of law.
- Failure to comply with a legal obligation.
- Disclosure related to miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The unauthorised use of Club funds.



- Possible fraud.
- That raises a safeguarding issue.
- You suspect breaches our policy on bribery and corruption
- Sexual, physical or other abuse of clients.
- That fails to comply with legal or regulatory obligations
- That fails to meet professional requirements
- That breaches any of the Club's employment policies
- Other unethical conduct.
- Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.
- That attempts to conceal one or more of these activities
- 3rd Part bullying.

Please speak to Head of People if you are unsure whether something that you are concerned about is covered by this policy.

6. Safeguards and Victimisation

- 6.1 The Club recognises that the decision to report a concern can be a difficult one to make. If what an employee is saying is true, they should have nothing to fear because they will be doing their duty to the employer and those for whom they provide a service.
- 6.2 The Club will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the employee when they raise a concern in good faith.

7. Confidentiality

- 7.1 All concerns will be treated in confidence, and every effort will be made not to reveal their identity if this is requested. At the appropriate time, however, they may need to come forward as a witness.
- 7.2 The policy encourages employees however to put their name to their concern wherever possible. Please note that:
- Staff must disclose the information in good faith.
 - Staff must believe it to be substantially true.
 - Staff must not act maliciously or make false allegations.
 - Staff must not seek any personal gain.
- 7.3.1 You are always encouraged to raise concerns openly, and we actively discourage anonymous whistleblowing. This is because it is not always easy to manage and to investigate anonymous reports, especially since if we are unable to ask you for clarification for further details, we may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion. In these circumstances, we risk missing evidence or opportunities to gather important supporting information, or



identify helpful witnesses, because we may simply be unaware of their existence, in spite of our best efforts to uncover them.

- 7.3.2 However, if you prefer to keep your identity anonymous, we will do all that we can to ensure that you retain your anonymity, and the confidentiality of your concerns, as far as possible. If we need to disclose your identity to others as part of the investigation, we will always discuss with you beforehand both our desire and our reasons for wishing to identify you.

8. Protection for whistleblowers

- 8.1 There are no reprisals for mistakes or if following our investigations, (which we will always conduct thoroughly and conscientiously), we conclude that there has been no breach of law, policy or unethical conduct. However, to qualify for protection, the disclosure must, in the reasonable belief of the individual making the disclosure, show that one or more of the following events has happened, is happening or is likely to happen and that it is in the public interest to make the disclosure:

- A criminal offence
- Failure to comply with any legal obligation
- Miscarriage of justice
- Danger to health & safety of any individual
- Danger to the environment, or,
- Deliberate concealment of any of any of the above.

- 8.2 If at any time, you do not feel that you have been fairly or properly treated by us in the handling of your whistleblowing concern, you must inform us immediately. You should inform Head of People in the first instance; and if you are not satisfied with the outcome of that conversation, you should follow the process set out in our grievance policy.

- 8.3 We also protect whistleblowers from others, so where a whistleblower reports to us that they have been treated inappropriately by others, (including having received threats as a result of raising their concerns), we will take disciplinary action against those individuals. The consequences of us taking this action could include dismissal of such individual(s) for gross misconduct. Whistleblowers may also be entitled to take legal action against those individuals.

9. Whistleblowing to others outside of LCC/Lancashire Cricket Foundation

- 9.1 Our policy covers the process for raising, investigating, and resolving wrongdoing within LCC/LCF's workplace.
- 9.2 The whistleblowing procedure that we have carefully put in place has been designed to ensure that to the best of our ability, we are able to resolve any concerns raised and to protect you as part of this process.



9.3 For these reasons, we anticipate that it would be extremely rare, if ever necessary, for you needing to involve anyone outside of LCC/LCF as part of this process.

10. Involving the press/media

10.1 Involving the media in a whistleblowing matter often has the effect of inflaming the situation, not assisting it. It can significantly hamper evidence gathering and the willingness of other relevant individuals to support the process.

10.2 We therefore strongly discourage you from involving the media. We will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. For example, we would generally expect you to have taken all reasonable steps to deal with the matter internally, or with an appropriate external regulator, before you could justify involving the press.

11. Data Protection

11.1 When a disclosure is made, the club will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

12. How to raise a concern

12.1 As a first step the employee should normally raise concerns with their immediate Line Manager. This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

12.2 Any adult or young person with concerns about a colleague's conduct towards a child, young person or adult at risk, can report this to the Clubs Safeguarding Officer by emailing Safeguarding@lancashirecricket.co.uk or by submitting [Clue Webform](#)

12.3 Concerns can also be raised with the Cricket regulator Safeguarding Team by emailing safeguarding@cricketregulator.co.uk

12.4 Please explain that you are raising your concerns as part of the LCC/LCF whistleblowing policy and procedure. Then set out all the key facts, including names of those involved and all relevant dates.

12.5 You will be invited to a meeting at which you can discuss your concerns. You are entitled to bring someone with you to this meeting – and any subsequent meetings. That companion may be a colleague (or a trade union representative, if relevant). Anyone who accompanies you will be asked to agree to keep strictly confidential the contents of the meeting including any materials disclosed and/or



examined during it. This obligation of confidentiality will extend before, during and after the meeting and any following investigation that we conduct in relation to the concerns raised by you.

- 12.6 Following this meeting, we will investigate the matters raised which may include additional meetings with you to assist us in our efforts. We may also decide to involve relevant external (or internal) specialists to help us conduct a thorough, fair and responsible investigation.
- 12.7 Our relevant personnel involved in this investigation will keep you informed about the progress of the investigation as far as they are able. For a number of reasons, generally relating to legal obligations, including obligations of confidence, to others, or in relation to any legal advice that we may decide to take on our own behalf, we may not be able to share every detail of our discoveries or deliberations with you. We will always endeavour, however, to reassure you, as best as we can, of the fact that we are taking your concerns seriously and that we are conducting a responsible investigation.
- 12.8 It is possible that the outcome of our investigations will not be one that you find satisfactory. If this happens, you are entitled to complain to the Chair of the LCC Board and request a review of what has been done and concluded. You may also make claim to an employment tribunal.
- 12.9 If you have raised a concern in good faith, our process and all those involved in giving effect to it will support and protect you. However, if a false concern is raised with us in bad faith (e.g. for malicious reasons), we will invoke our disciplinary policy, and you may be subject to disciplinary action.

13. Process Flow Chart

