

# ESSU Whistleblowing Policy

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# Policy Statement

ESSU is committed to maintaining the highest standards of integrity, transparency, accountability and safeguarding throughout all areas of the organisation. We encourage anyone connected with ESSU who becomes aware of wrongdoing, misconduct, illegal activity, safeguarding concerns or unethical behaviour to raise their concerns without fear of retaliation.

ESSU recognises that speaking up can be difficult. This policy exists to ensure that concerns can be reported safely, confidentially and appropriately, and that all reports are treated seriously and investigated fairly. No individual who raises a genuine concern in good faith will suffer disadvantage, victimisation or retaliation as a result of speaking up.

## Purpose

The purpose of this policy is to:

- Encourage the reporting of serious concerns and wrongdoing.
- Promote a culture of openness and accountability.
- Protect individuals who raise concerns in good faith.
- Ensure concerns are investigated appropriately.
- Safeguard participants, volunteers, staff and the wider ESSU community.
- Support legal and regulatory compliance.
- Protect the reputation and integrity of ESSU.

## Scope

This policy applies to:

- Employees
- Volunteers
- Athletes and participants
- Coaches and officials
- Committee members
- Contractors and consultants
- Members
- Anyone acting on behalf of ESSU

The policy applies to concerns relating to ESSU activities, programmes, events and operations.

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## Definition of Whistleblowing

Whistleblowing is the disclosure of information relating to wrongdoing, malpractice or risk that is in the public interest and which an individual reasonably believes to be true.

A whistleblowing concern is generally more serious than a personal grievance and usually relates to matters that affect:

- Participants
- Staff
- Volunteers
- Members
- The organisation
- The wider public

This policy is intended for concerns relating to misconduct, wrongdoing or organisational failings.

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## Legal Framework

This policy is informed by and supports the principles contained within:

### **Public Interest Disclosure Act 1998 (PIDA)**

PIDA provides legal protection for workers who make certain qualifying disclosures in the public interest regarding wrongdoing within an organisation.

The protections established under PIDA are now incorporated within the:

### **Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998).**

ESSU will operate this policy in accordance with current UK legislation and good practice guidance.

# When Should You Raise a Concern?

Everyone involved with ESSU has a responsibility to speak up when they become aware of serious misconduct, malpractice or risks to others.

Concerns should be reported where you believe wrongdoing:

- Has occurred.
- Is currently occurring.
- Is likely to occur in the future.

Reports should be made as soon as reasonably possible.

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## Matters That May Be Reported

Examples of concerns that may be raised under this policy include, but are not limited to:

### Criminal Conduct

- Fraud
- Theft
- Corruption
- Bribery
- Financial misconduct
- Criminal offences

### Safeguarding Concerns

- Child abuse
- Neglect
- Emotional abuse
- Physical abuse
- Sexual abuse
- Grooming
- Exploitation
- Failures to safeguard children or adults at risk

## **Bullying, Harassment and Discrimination**

- Bullying behaviour
- Harassment
- Victimisation
- Hate incidents
- Discriminatory practices

## **Health and Safety Risks**

- Serious breaches of health and safety procedures
- Unsafe working practices
- Failure to manage significant risks

## **Financial Impropriety**

- Misuse of funds
- Financial malpractice
- Accounting irregularities
- Unauthorised expenditure

## **Governance and Ethical Concerns**

- Abuse of authority
- Conflicts of interest
- Favouritism
- Improper recruitment practices
- Serious breaches of ESSU policies

## **Misuse of Resources**

- Deliberate misuse of ESSU property
- Misappropriation of organisational assets
- Unauthorised use of funds or equipment

## **Concealment**

- Deliberately withholding information relating to any wrongdoing listed above.
  - Attempting to cover up misconduct or organisational failures.
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# Matters Not Normally Covered by This Policy

The following matters will generally be managed through other procedures:

- Personal grievances
- Selection appeals
- Competition result appeals
- Routine operational disagreements
- Complaints already addressed through formal procedures

However, concerns regarding how such matters have been handled may fall within this policy where misconduct or malpractice is alleged.

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## How to Raise a Concern

ESSU encourages concerns to be raised internally in the first instance wherever possible.

### Step 1

Report the concern to one of the following:

- ESSU Event organiser.
- ESSU Programme lead.
- ESSU Safeguarding Lead (for safeguarding concerns).
- Any other senior ESSU committee representative.

Provide as much information as possible, including:

- What happened.
  - When and where it happened.
  - Who was involved.
  - Any available evidence.
  - Names of any witnesses.
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## Step 2

The recipient of the concern should:

- Listen carefully.
- Record the information provided.
- Explain next steps.
- Identify any urgent safeguarding or safety risks.
- Refer the matter to the appropriate individual for investigation.

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## Alternative Reporting Routes

If the concern involves the person listed above, or you feel unable to report through normal channels, you may report directly by email to:

- The Chair of the ESSU [chair@englandshooting.org.uk](mailto:chair@englandshooting.org.uk)
- The Vice-Chair of the ESSU [vicechair@englandshooting.org.uk](mailto:vicechair@englandshooting.org.uk)
- The Secretary of the ESSU [secretary@englandshooting.org.uk](mailto:secretary@englandshooting.org.uk)

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## Anonymous Reports

ESSU encourages individuals to identify themselves when raising concerns because this assists effective investigation rather than go down the anonymous reporting route.

Anonymous disclosures **will still be** considered, taking into account:

- The seriousness of the concern.
- The credibility of the information provided.
- The likelihood of obtaining supporting evidence.

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## Protection for Whistleblowers

ESSU is committed to protecting individuals who raise concerns honestly and in good faith.

No individual will be subjected to:

- Victimisation

- Harassment
- Discrimination
- Retaliation
- Detrimental treatment

because they have raised a genuine concern.

This protection applies even if an investigation later concludes that no wrongdoing occurred, provided the disclosure was made honestly and reasonably.

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## Malicious or False Allegations

ESSU will not tolerate deliberately false or malicious allegations.

Where it is determined that an individual has knowingly made a false report:

- For personal gain;
- To cause harm to another person; or
- With malicious intent,

appropriate disciplinary action may be taken.

This provision does **not** apply where a concern is raised honestly but cannot be substantiated following investigation.

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## Investigation Process

All whistleblowing disclosures will be assessed appropriately and proportionately.

### Initial Response

ESSU will normally endeavour to:

- ☒ Acknowledge receipt within **five working days**.
- ☒ Undertake an initial assessment of the concern.
- ☒ Determine the most appropriate route for investigation.
- ☒ Identify any immediate safeguarding or safety risks.

## Investigation

The appointed investigator may:

- Review documentation.
- Gather evidence.
- Interview relevant individuals.
- Seek specialist advice.
- Refer matters to external agencies where necessary.

No person who is the subject of allegations will be involved in investigating those allegations.

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## Possible Outcomes

An investigation may result in:

- No further action.
  - Recommendations for improvement.
  - Changes to procedures or practices.
  - Training or education.
  - Formal disciplinary proceedings.
  - Regulatory notification.
  - Referral to external agencies.
  - Police involvement.
  - Safeguarding action.
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## Safeguarding Referrals

Where a whistleblowing concern relates to:

- Child protection,
- Abuse,
- Neglect,
- Exploitation,
- Vulnerable adults, or
- Serious welfare concerns,

ESSU may immediately refer the matter to:

- Police
- Children's Services
- Adult Social Care
- National Governing Bodies
- Other statutory authorities

Safeguarding concerns will always take priority over other investigative processes.

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## Confidentiality

ESSU will make every reasonable effort to maintain confidentiality.

Information will only be shared where necessary for:

- Investigation purposes.
- Safeguarding requirements.
- Legal obligations.
- Regulatory reporting.

While confidentiality will be respected wherever possible, it cannot be absolutely guaranteed in circumstances where legal or safeguarding obligations require disclosure.

Where disclosure becomes necessary, ESSU will seek to inform the whistleblower where appropriate and lawful to do so.

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## External Disclosures

ESSU encourages concerns to be raised internally wherever possible.

However, where appropriate and permitted by law, individuals may make disclosures to prescribed external bodies in accordance with whistleblowing legislation.

Examples may include:

- The Charity Commission
- Health and Safety Executive (HSE)
- Information Commissioner's Office (ICO)
- Police
- Relevant regulatory authorities

Individuals should seek advice before making external disclosures.

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# **Roles and Responsibilities**

## **All Individuals**

Everyone associated with ESSU is responsible for:

- Acting with integrity.
  - Reporting genuine concerns.
  - Cooperating with investigations.
  - Supporting a culture of openness and accountability.
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## **Managers and Leads**

Managers, leads and officials receiving concerns must:

- Take allegations seriously.
  - Escalate concerns appropriately.
  - Maintain confidentiality.
  - Protect whistleblowers from retaliation.
  - Support investigations.
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## **ESSU Committee**

The ESSU Committee is responsible for:

- Overseeing implementation of this policy.
- Monitoring whistleblowing activity.
- Ensuring independence in investigations.
- Reviewing policy effectiveness.
- Promoting good governance and accountability.
- Reviewing whistleblowing outcomes.
- Monitoring trends and risks.
- Recommending governance improvements.
- Supporting independent and impartial investigations where appropriate.

# Monitoring and Reporting

ESSU will maintain appropriate records of whistleblowing concerns.

Anonymous trend data may be reviewed to identify:

- Repeated issues.
- Emerging risks.
- Safeguarding concerns.
- Governance weaknesses.
- Opportunities for improvement.

Reports may be considered by the Committee while respecting confidentiality requirements.

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# Communication and Training

ESSU will ensure this policy is:

- Available to all stakeholders.
- Published on appropriate platforms.
- Included within inductions where relevant.
- Supported through education and awareness activities.

ESSU will encourage a culture where raising concerns is viewed as a positive contribution to safeguarding, governance and organisational improvement.

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# Related Policies

This policy should be read alongside:

- ESSU Code of Conduct
- ESSU Complaints Policy
- ESSU Bullying and Harassment Policy
- ESSU Equality Policy
- ESSU Safeguarding Children Policy and Procedures
- ESSU Safeguarding Adults Policy and Procedures

# Policy Review

This policy will be reviewed:

- Every three years;
  - Following legislative changes;
  - Following significant incidents;
  - Following governance or safeguarding reviews; and
  - Whenever organisational learning identifies a need for amendment.
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