



Purpose

The Sport Cheer England Policy on Conduct (“Conduct Policy”), which is available at: www.sportcheerengland.org, outlines the behaviour expectations and standards of all Sport Cheer England Participants (as defined below). It is in the interest of all Sport Cheer England (SCE) Participants that concerns regarding SCE Participants’ conduct at SCE Activities (as defined below) be promptly reported so that they can be properly addressed. The purposes of this SCE Whistleblowing Policy (“Policy”) are (i) to encourage and enable SCE Participants to raise any concerns about behaviour, to report any prohibited behaviour, or any breach, or potential, or suspected breach of the Conduct Policy without fear of reprisal, and (ii) to provide for anonymous reporting. Such individuals raising these concerns are referred to as “Whistle-blowers”.

Rationale

It is an honour and privilege to be involved in the sport of Cheerleading. To maintain and continue the development of the positive image of the sport, it is expected that SCE employees, contractors, members, registrants, and volunteers conduct themselves with integrity and to the highest standards of conduct, in accordance with SCE values.

SCE Participants (as defined below) are expected to conduct themselves in all matters involving or impacting SCE, and where they may be seen to be representing SCE, in a manner that is fully consistent with the highest standards of behaviour upon which SCE’s reputation rests. At all times, SCE Participants’ behaviour must reflect and not compromise the trust of SCE’s stakeholders.

In order to further SCE’s commitment to having a positive, safe and respectful environment, this Policy facilitates the reporting of any concerns about behaviour, or of any prohibited behaviour or of any breach, or potential or suspected breach of the Conduct Policy by providing an additional mechanism to report such behaviour, including, if desired, reporting anonymously.

Applicability

This Policy applies at all times, wherever SCE work or activities take place, which includes locations in England and abroad, and includes all activities over which SCE has jurisdiction (collectively “SCE Activities”). This Policy applies to all SCE participants, which include all persons engaged in any paid or volunteer capacity with SCE or otherwise under the jurisdiction of SCE (“SCE Participants”). Without limiting the foregoing, SCE Participants include the following when they are or would be reasonably perceived as representing SCE and involved in SCE Activities:



- a) SCE directors, officers, committee members and volunteers;
- b) SCE employees, interns and persons under contract with SCE;
- c) all athletes eligible for nomination to, or forming part of, any team participating in sport competitions over which SCE has jurisdiction or in any activity in which it is reasonable to believe such individuals are representing SCE; and
- d) all persons working with those teams or athletes, including coaches, medical and paramedical personnel, sports federation representatives, and other support persons.

Policy Statements

All SCE Participants are expected to promptly report any behaviour of which they become aware that may constitute a breach of the Conduct Policy or contravenes the law. This includes situations where the breach is suspected, provided the SCE Participant has reasonable grounds to believe such suspicion is true.

No person who is the subject of the report, or who has a material interest in the matter shall participate in the initial review and assessment procedure described below (except as a party, if applicable).

Confidentiality

SCE will use reasonable efforts having regard to the circumstances, to conduct the initial review and assessment in strict confidence, including where reasonably possible, protecting the anonymity of the Whistle-blower.

To the extent possible, reports, complaints, witness statements and other documents produced under this Policy or shared in an investigation, shall be held in confidence by SCE, provided that, no guarantees of confidentiality may be made by SCE. Circumstances in which information may be shared include, without limitation:

- a) when criminal conduct may be involved;
- b) when it is felt to be necessary to protect others from harassment, discrimination, violence or any other potential breach of the Conduct Policy;
- c) when required to ensure fairness or natural justice in the procedures contemplated by this Policy;
- d) in the course of an investigation by a law enforcement agency;
- e) to protect the interests of SCE; and
- f) when required by law.

Reprisals



Any person who reports a concern in good faith will not be subject to reprisal or other adverse consequences as a result of submitting a report.

Any SCE Participant who has reasonable grounds to believe that a reprisal has occurred may file a complaint under the Conduct Policy. Any SCE Participant who retaliates against someone who has reported a concern in good faith will be subject to sanctions in accordance with the Conduct Policy.

For the purpose of this Policy, knowingly making a groundless or false allegation, or knowingly providing false information shall also be deemed a reprisal and may be subject to sanctions under the Conduct Policy.

Procedure

A concern can be reported in confidence using the SCE's online Whistle-blower Form (see page 5 below). All reporting information is outlined on the attached Whistle-blower Form.

The Whistle-blower Form will be received by the SCE's Chair of the Audit Committee with a copy to the SCE's Chairperson, for initial review and assessment. In the event the matter being reported involves the Audit Committee Chair or Chairperson, the matter may be reported to the Vice Chair of the committee and/or to the Vice Chairperson, which person shall assume the responsibilities of the chair of that committee for the purposes of this matter under the Policy.

The Audit Committee Chair may, with discretion, engage the assistance of the Chairperson and, in circumstances where the matter does not involve a report related to financial matters, the Audit Committee Chair may, in its discretion, hand the matter over to the Chairperson to oversee the initial review and assessment.

Following the initial review and assessment, if it has been determined that the matter merits further review and action, the Chair with responsibility of investigating the matter ("Committee Chair") will so advise SCE's Chairperson and the matter shall thereafter be handled in accordance with the Conduct Policy. If the SCE Chairperson is the subject of the report or has a material personal interest in the matter, the Chair will handover responsibility of the matter to the Vice Chairperson and the matter shall thereafter be handled in accordance with the Conduct Policy.

As part of the initial review and assessment, the Committee Chair shall have the following rights and authority:

- a) to retain outside counsel, accountants, investigators and other external resources or engage or inform internal resources, as deemed necessary to conduct an appropriate initial review and



assessment to determine whether the matter necessitates a more fulsome review as outlined in the Conduct Policy or to otherwise manage the situation;

- b) to share such information as is deemed necessary to ensure the effective resolution of any complaint in the most appropriate forum;
- c) to refer a matter to a more appropriate authority (e.g. UK Anti-Doping, Sport England, UK Sport or International Cheer Union, WADA or Safe Sport); and
- d) at the Committee Chair's sole discretion, to place a complaint in abeyance pending the resolution of a similar or other related complaint first.

Except when a report is anonymous, the Whistle-blower will be advised once the initial review and assessment of a matter has been completed, and if the matter has been provided to the SCE Chairperson for further investigation in accordance with the Conduct Policy. In such circumstances, the Whistle-blower shall be directed to the Conduct Policy.

In any year in which a concern has been reported through the Whistle-blower mechanisms, a summary of the reports filed, and actions taken under this Policy will be provided to the Sport Cheer Executive Committee/ Board.

The Committee Chair shall forward to the SCE Chairperson the documentation resulting from every report received under this Policy, which may include a written report initiated by the Committee Chair on behalf of an anonymous Whistle-blower, when warranted; provided that, if the Chairperson is the subject of the report or has a material personal interest in the matter, the Committee Chair shall forward the documentation resulting from such report received under this Policy to the SCE Vice Chairperson only.

In the event of an inconsistency between this Policy and the Conduct Policy, the Conduct Policy prevails.

Questions

Questions relating to this Whistleblowing Policy should be directed to SCSafeguarding@gmail.com

Reporting

To report a concern, you may complete the attached form and email it to: SCSafeguarding@gmail.com



Whistle-blower Form

This Whistle-blower Form allows you the opportunity to provide your name and contact information in confidence as this information may assist SCE in investigating your concern. Should you not wish to provide your name, reported incidents will still be accepted and investigated if sufficient documentation and evidence is provided to substantiate the claim.

Instructions

Please provide as much detail as possible.

1. Describe the nature of your concern. Include sufficient information for an independent person to understand the concern and to enable further investigation.
2. Provide details with respect to the location and/or date of the incident (e.g. region, event, specific location, department, etc.) and how you became aware of it.
3. State the full name, title and role of each individual whom you suspect of wrongdoing.
4. How many times has this incident taken place (if applicable)?
5. How long has this incident been taking place (if applicable)?
6. Describe steps if any, you took prior to completing this report (e.g. discussing it with individual, informing supervisor).
7. Would you be willing to provide your name and contact information? (Please note that this is optional)

No. If no, we may not be able to follow up with you.

Yes. If yes, please provide your name, email, and telephone number for follow up purposes.

Please limit your comments to factual statements.