

Soho Swim Whistleblowing Policy

Preface

Soho Swim wishes to conduct all business with integrity at all times. Soho Swim actively encourages the reporting of any working practices that are dangerous, illegal, unethical or fraudulent and to protect those reporting these. Soho Swim understands that at times things go wrong and mistakes can be made. A culture of reporting and transparency in such instances is encouraged so that immediate action can be taken to remedy any mistakes or wrong doing and that policies, procedures and practices can be amended to ensure future appropriateness.

What is Whistle Blowing?

A whistle blower is someone who reports suspected wrong doing at work. This is officially called 'making a disclosure in the public interest'.

Wrongdoing may include:

- Putting someone's health and safety in danger
- Damaging the environment
- A criminal offence
- The organisation is not obeying the law
- Covering up wrongdoing

A whistle blower is protected by the law and will not be treated detrimentally or dismissed as long as the reporting is in good faith, not malicious or for personal gain. If reporting is malicious or for personal gain there is no protection by law. A whistle blower is not expected to investigate any potential wrong doing but to refer it for Soho Swim to investigate further.

Reporting of Whistle Blowing

Anyone associated with Soho Swim can report any potential wrong doing at any time. This includes internal staff, associates, volunteers, and trustees.

To report a potential wrong doing please send details to Info@sohoswim.co.uk.

The following steps will be taken:

- All reports of potential wrongdoing will be treated seriously
- The report will be promptly and fairly investigated
- Any wrongdoing that involves criminal activity will be reported to the police
- The whistle blower may be interviewed and asked to provide a written witness statement setting out the nature and details of the report and the basis for it
- Whistle blowers will be asked to disclose as much supporting evidence as possible to ensure timely and effective investigation to The Soho Swim Quality Manager at info@sohoswim.co.uk

Whistle blowing can be anonymous. Soho Swim will endeavour to process this in the same way as if the identity of the whistle blower is known however it may not always be possible to investigate or substantiate anonymous disclosures as fully.

The length and scope of the investigation will depend on the subject matter of the report.

A specific time frame is not stated given the potential diversity of reports.

Once the investigation has been completed, the whistle blower will be informed in writing of the outcome, together with Soho Swim's conclusions and decision in a timely manner. However, the need for confidentiality may mean the whistle blower is not given specific details of the investigation or actions taken.

Soho Swim may on completion of the investigation report the matter to the relevant awarding body.

If, on conclusion of the above stages, that appropriate action has still not been taken, the whistle blower may then report the matter to the proper authority in good faith. The Act sets out a number of prescribed external bodies or persons to which qualifying disclosures may be made. These include HM Revenue & Customs (HMRC), The Financial Services Authority (FSA), Office of Fair Trading (OFT), Health & Safety Executive (HSE) and the Environment Agency.

Confidentiality

Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, Soho Swim must be able to determine the scope of the investigation and the individuals who should be informed of or interviewed about the disclosure. If it becomes necessary to disclose the identity of the whistle blower, Soho Swim will make efforts to inform you that your identity is likely to be disclosed. In order not to jeopardise the investigation, you are also expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential.

Date of Change: 24/06/2025

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