SARACENS

SARACENS LIMITED AND SARACENS PRIVACY POLICY

Whistleblowing Policy reviewed October 2026. This will be reviewed again in October 2027.

WHISTLEBLOWING POLICY

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers agency workers and any 3rd party stakeholders.
This policy does not form part of any employee's contract of employment, and we may amend it at any time.

What is Whistleblowing?
Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, safeguarding concerns, data breaches, unethical behaviour such as discrimination, harassment, workplace violence and or abuse of power, damage to the environment and any breach of legal or professional obligations. It also includes the following matters specific to this workplace.
How to Raise a Concern
We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Whistleblowing Office and contact details are at the end of this policy.
We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Confidentiality
We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

External Disclosures
The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

External disclosures can be made in the UK to various whistleblowing bodies and depending on the nature of the concern. Some examples include:

- Health and Safety Executive (HSE): For health and safety violations
- HMRC: For issues relating to tax avoidance or fraudulent activity

- RFU: For issues relating to Rugby related concerns in line with the Speak Up Policy
- ICO: For issues relating to data protection regulations

When choosing a whistleblower body, consider the specific nature of the concerns and which organisation has the most relevant expertise to the concern in question.

Protection and Support for Whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

CONTACT	DETAILS
Whistleblowing Officer Stadium Manager	**Herman Beetge** hermanbeetge@saracens.net
Head of People and Culture	**Dominie Bradshaw** dominiebradshaw@saracens.net
Protect Independent whistleblowing charity (formerly Public Concern at Work)	Advice line: 020 3117 2520 whistle@protect-advice.org.uk www.protect-advice.org.uk