



PCB[®]

Pakistan Cricket Board

**WHISTLEBLOWING
POLICY**

w.e.f. 09 November 2020



1. BACKGROUND AND INTRODUCTION

1. Pakistan Cricket Board (PCB) has been established under the Sports (Development and Control) Ordinance, 1962 (XVI of 1962) as a body corporate having perpetual succession and regulates, administers, manages and promotes the game of cricket as an autonomous governing body throughout Pakistan.
2. The PCB has a zero tolerance policy for any form of corruption or dishonest behaviour by any of its officers or any player or any other person associated with the game and aims/seeks to implement appropriate systems to address this menace.
3. Stakeholders represent a valuable source of information that can be utilised to identify a potential problem and to deal with it before it causes significant damage to PCB or its stakeholders. Therefore, the PCB has introduced this Whistleblowing Policy which aims to assist PCB in ensuring that such incidents of misconduct are identified and dealt with appropriately.
4. PCB recognises that a situation may arise where an individual may become aware of a wrongdoing, misconduct, illegal acts or omission which may amount to Whistleblower Information as defined under this Policy and still may not be able to express their concerns out of loyalty to colleagues and/or fear of harassment, disadvantage or victimisation as a result of disclosure; however, this must NOT result in the organisation or any other vulnerable person being placed in continuous risk due to the withholding of information. Hence, PCB encourages everyone involved with the organisation to identify and report on instances regarding activities, behaviours and/or practices that are inappropriate, damaging and unacceptable, for appropriate action by the concerned/competent authorities.

2. DEFINITIONS

In this Policy, unless the context otherwise requires, the following expressions shall have meaning hereby ascribed to them:

- a) **“Board” or “PCB”** means the Pakistan Cricket Board;
- b) **“Chairman”** means Chairman of the Board;
- c) **“Chief Executive Officer” or “CEO”** means the Chief Executive Officer of the Board;
- d) **“Chief Operating Officer” or “COO”** means the Chief Operating Officer of the Board;
- e) **“Inquiry Committee”** means an inquiry committee constituted by the Chairman/CEO to investigate Whistleblower Information in accordance with Section 6 below;
- f) **“Employee”** means employee of the Board as defined in the PCB HR Manual;



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- g) **“Policy”** means the instant Whistleblowing Policy, as amended from time to time;
- h) **“Protected Disclosure Officer(s)”** means the person(s) referred to under Schedule I attached hereto and shall include any person acting in this role, or a representative of the Protected Disclosure Officer as nominated in writing by the Protected Disclosure Officer;
- i) **“Whistleblower”** means a natural person or entity who reports Whistleblower Information to the Protected Disclosure Officers under this Policy; and
- j) **“Whistleblower Information”** means a report or complaint relating to any actual or suspected wrongdoing, misconduct, illegal acts or omission to act in accordance with PCB’s approved regulatory framework as more particularly detailed under Section 3 below. This shall include disclosure of information relating to conduct that is considered or reasonably believed to be contravening PCB’s rules, regulations, codes and policies etc. as well as applicable laws of Pakistan.

3. SCOPE

1. This Policy aims to encourage stakeholders, including but not limited to PCB Employees, officials, players and player support personnel, to raise any concerns they may have about their colleagues or any other person affiliated with the Board in whichever capacity with confidence, promptly and without fear of resultant detriment, disadvantage, reprisal or repercussions, in a confidential manner under the *infra* reporting procedure.
2. Any Whistleblower Information shall be reported directly to the Protected Disclosure Officer(s). This may be in relation to matters which may include, without limitation, any actual or suspected:
 - a) conduct or practices, while on official duty, that are illegal or breach any law;
 - b) significant mismanagement or waste of PCB’s funds and/or resources;
 - c) breach of PCB’s regulations, codes, policies and procedures;
 - d) corrupt activities while on official duty;
 - e) theft, fraud or misappropriation while on official duty;
 - f) illegal or unauthorized use of PCB’s intellectual property or confidential data;
 - g) serious harm to public health, safety or environment or to PCB’s employees, officials, players or player support personnel;
 - h) any other conduct that is reasonably likely to cause loss to Pakistan cricket or otherwise that is reasonably likely to be detrimental to its interests; and
 - i) any action taken against or harm suffered by an employee/person as a result of making a report under this Policy.

Provided that Whistleblower Information shall not be disclosed if it contains disclosure of personal information or if the information has no relationship with public interest/Pakistan cricket or if the information causes unwarranted invasion of privacy, except if it is permitted to be disclosed under applicable laws.



4. PROCEDURE

1. Any person who becomes aware of any matter or behaviour that may amount to Whistleblower Information should immediately report the same to a Protected Disclosure Officer:
 - a. Every report shall be made in writing or by electronic mail at whistle@pcb.com.pk and be accompanied by supporting evidence, documentation, or other material, if any, and include:
 - i. full name, designation and department / company of the Whistleblower
 - ii. date of the report
 - iii. nature and summary of the concerns being raised
 - iv. details of any witnesses or supporting evidence
 - v. details of any steps taken to resolve the matter informally
 - b. Any person making such report shall make a personal declaration stating that he reasonably believes that the information disclosed and the allegations contained therein are true to the best of their knowledge.
2. After due diligence / screening of the Whistleblower Information report, the relevant Protected Disclosure Officer or his/her authorised representative will contact the Whistleblower to acknowledge receipt of the report and provide guidance on next steps, if any.
3. Anonymous reports, filed without any supporting evidence, shall not be entertained and no action shall be taken in respect of the disclosure of the relevant Whistleblower Information if the report does not indicate the identity of the Whistleblower or the identity of the Whistleblower is found to be incorrect or false.
4. Where a Whistleblower provides their contact details, such details shall not be provided to any other person without the Whistleblower's consent, except for as may be required by applicable laws.
5. A register of all Whistleblower Information reports shall be maintained by the Protected Disclosure Officer, who shall share the same with the CEO on a quarterly basis and with the Chairman PCB, if needed.

5. CONFIDENTIALITY AND PROTECTION

1. The Whistleblower's identity and contents of the report will be kept confidential and no details of the report will be disclosed to anyone except those that are required to be involved in investigating the matters raised in the report.
2. The Whistleblower must also maintain confidentiality and not disclose details of the report to any person except as permitted under applicable laws.
3. All persons involved in a particular report shall be treated fairly and their concerns properly addressed. In case suspicions prove to be unfounded, no action shall be taken against the Whistleblower, provided they acted in good faith and without malice.



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4. Should any person publicly raise their concern without following this Policy, except for exceptional circumstances, such public statement/disclosure may constitute serious misconduct and be dealt with in accordance with applicable disciplinary procedures.
 5. A Whistleblower shall be protected from any form of detriment, including discrimination, harassment or retaliation as a consequence of the disclosure of Whistleblower Information. To this effect, the relevant Protected Disclosure Officer shall maintain ongoing contact with the Whistleblower as circumstances warrant.

6. INVESTIGATIONS

1. All reports made in good faith shall be reviewed by the Protected Disclosure Officer and forwarded, under strict confidentiality, to the appropriate person(s)/department(s) for their feedback. If circumstances so warrant, the matter may be referred to the Chairman/CEO, who shall constitute an Inquiry Committee to investigate the matter in detail and submit recommendations.
2. Investigations, if required, shall be carried out with the objective of locating evidence that substantiates or refutes the claims/allegations made by the Whistleblower.
3. All investigations shall be conducted in-camera without bias and any person against whom an allegation is made will be provided the opportunity to respond to such allegations raised, which may include an opportunity of a personal hearing to be provided in accordance with the principles of natural justice, prior to determination being made in respect of the same.
4. Any substantiated reports will be managed/dealt with in accordance with the relevant applicable laws, regulations and codes etc.
5. PCB recognizes that there may be certain matters that cannot be dealt with internally and external authorities may need to become involved or be engaged to assist in the investigation process. In such circumstances, PCB reserves the right to make such a referral without an individual's consent.

N.B. These proceedings shall be in-house departmental proceedings.

7. FRIVOLOUS REPORTS

It is acknowledged that a report may damage the career prospects and reputation of people who are the subject of the Whistleblower Information. Therefore, if a report is found to be malicious, deliberately misleading, vexatious or frivolous in that the Whistleblower did not have reasonable grounds to suspect that the information disclosed would indicate misconduct or if there is abuse of the process, the Whistleblower may be subject to disciplinary proceedings.



SCHEDULE I

PROTECTED DISCLOSURE OFFICER(S)

Nature of Report	Protected Disclosure Officer
Anti-Corruption	All Whistleblower Information shall be sent to the Chief Operating Officer
Anti-Doping	
Breach of Contracts	
Cricket	
Ethics and Integrity	
Financial Operations	