



RAISING CONCERNS – “WHISTLEBLOWING POLICY”

This policy applies to all employees and members of Penmaenmawr Golf Club. Other individuals performing functions in relation to the organisation, such as coaches or visiting golfers are encouraged to use it.

It is important to the business that any fraud, misconduct or wrongdoing by members, employees or officers of the Club is reported and properly dealt with. The Club therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

QUALIFYING DISCLOSURE

The law provides protection for employees and other individuals who raise legitimate concerns about specified matters. These are called “qualifying disclosures”. A qualifying disclosure is one made in the public interest by an employee or individual who has a reasonable belief that:

- a. A criminal offence
- b. A miscarriage of justice
- c. An act creating risk to health and safety
- d. An act causing damage to the environment
- e. Damaged breach of any other legal obligation; or
- f. Concealment of any of the above

Is being, has been, or is likely to be, committed. It is not necessary for the employee or individual to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. The employee or individual has no responsibility for investigating the matter – it is the Club’s responsibility to ensure that an investigation takes place.

An employee who makes such a protected disclosure has the right not to be dismissed in the first instance.

If an employee is not sure whether or not to raise a concern, he/she should discuss the issue with a member of management.

PRINCIPLES

- a. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees and members should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of

- b. Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee or individual who raised the issue
- c. No employee or member will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern
- d. Victimisation of an employee or member for raising a qualified disclosure will be a disciplinary offence
- e. If misconduct is discovered as a result of any investigation under this procedure the Club's disciplinary procedure will be used, in addition to any appropriate external measures
- f. Maliciously making a false allegation is a disciplinary offence
- g. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent, they should report the matter to a member of management

PROCEDURE

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his/her own contract has been, or is likely to be, broken, he/she should use the Club's grievance procedure.

The Club is committed to address any issues of malpractice and positively encourages employees to use the available channels to raise any concerns they may have.

Should you wish to raise a complaint you should do so in writing to the Management Committee.

The designated person who carried out the investigation will then report to management, which will appoint an official to meet with you to discuss your concern and gather the appropriate evidence. Your complaint will then be investigated in full and, on conclusion of the investigation, take any necessary action, including reporting the matter to any appropriate government department or regulatory agency.

If disciplinary action is required against any employee or member of the Club the person who carried out the investigation will report the matter to Management who will start the disciplinary procedure.

On conclusion of any investigation, you will be told the outcome of the investigation and what Management has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

If the employee or member reasonably believes that the appropriate action has not been taken, he/she should report the matter to the proper external authority. The legislation sets out a number of bodies to which qualifying disclosures should be made. These include:

- a. HM Revenue & Customs
- b. Financial Conduct Authority
- c. The Office of Fair Trading
- d. The Health and Safety Executive
- e. The Environment Agency
- f. The Director of Public Prosecutions; and
- g. The Serious Fraud Office

If you have any questions with regards to this policy please contact the Club Captain.