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Title: **Whistleblowing Policy**

Revision: 3

Date: 27 April 2015

Reviewed – 30<sup>th</sup> April 2028

Reviewed – 23<sup>rd</sup> November 2021

Amendments have been made following reforms introduced by the Enterprise and Regulatory Reform Act.

## **1. WHISTLEBLOWING POLICY**

- 1.1. The club is committed to operating honestly and with integrity at all times. In line with this aim, the club encourages its staff members and other third parties with concerns about any aspect of the club's business to come forward and disclose those concerns.
- 1.2. The aim of this policy is to encourage staff to raise any serious concerns and provide reassurance that any disclosures will be dealt with sensitively and in confidence. No staff member will suffer any detriment or disadvantage as a result of raising an issue.

## **2. WHAT IS WHISTLEBLOWING?**

- 2.1. Whistleblowing is the disclosure of information (made in the public interest) which relates to suspected wrongdoing or dangers at work. This may include:
  - 2.1.1. Criminal offence or activity;

- 2.1.2. Bribery;
- 2.1.3. Financial fraud;
- 2.1.4. Miscarriage of justice;
- 2.1.5. Failure to comply with a legal obligation;
- 2.1.6. Action that poses a danger to health and safety;
- 2.1.7. Damage to the environment; or
- 2.1.8. The deliberate concealment of any of the above matters.
- 2.2. This policy does not form part of your employment contract.
- 2.3. Staff members are encouraged to raise issues regardless of whether the matter has already happened, is still happening, or is likely to take place in the future.
- 2.4. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure.

### **3. Procedure for making a qualifying disclosure**

- 3.1. *Step One – Informal Procedure*
- 3.2. Staff members are encouraged to approach their line managers with any concerns in the first instance.
- 3.3. The line manager will take steps to attempt to adequately resolve the matter within a reasonable timescale.
- 3.4. It is hoped that in the majority of circumstances, this informal approach will satisfy any concerns the reporting staff member may have.
- 3.5. *Step Two – Formal Procedure*
- 3.6. If in the circumstances it would be inappropriate to raise the concern with the line manager, or the seriousness and sensitivity of the matter require it, staff members are encouraged to raise the issue with a more senior manager and/or the Whistleblowing Officer (contact details are included at the end of this policy)..
- 3.7. The staff member shall be asked to set out the concern in writing, detailing the basis of their concerns and the desired outcome.

- 3.8. The staff member will then be invited to attend a meeting to discuss the disclosure further. The staff member may bring a colleague or trade union representative as a companion to the meeting.
- 3.9. The manager/Whistleblowing Officer shall then commence a full investigation into the disclosure, this shall take place within a reasonable time frame.
- 3.10. Once the investigation has been concluded, the staff member shall be updated in relation to the outcome and any action taken as a result of the investigation.
- 3.11. *Stage Three – External Disclosure*
- 3.12. Where stages one and two have not been completed within a reasonable time scale, or the staff member is not satisfied with the outcome, the staff member may wish to refer the matter to an appropriate individual of higher authority for investigation. The law recognises in some circumstances it may be appropriate to report concerns to an outside body, such as a regulator. We strongly recommend you seek advice before reporting a whistleblowing concern to anyone external. The charity Public Concerns at Work can be contacted on telephone (020) 7404 6609 email [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk) website [www.pcaw.co.uk](http://www.pcaw.co.uk)
- 3.13. Only in some circumstances will the law protect you if you can make a disclosure to an external person. You are therefore encouraged to report internally following the procedure above (para 3.4 and 3.5).

#### **4. Protection and support for whistleblowers**

- 4.1. The reporting staff member shall not suffer any detrimental treatment as a result of raising a concern.
- 4.2. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform an appropriate manager immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- 4.3. All disclosures will be treated sensitively and confidentially. If the circumstances of the complaint result in it being necessary to reveal the identity of the whistleblower, this shall be discussed with the staff member in advance.
- 4.4. Any employee found to have treated a whistleblower detrimentally will be subject to disciplinary action. Such an offence shall usually be considered gross misconduct.

5. A whistleblower must have a reasonable belief that the information disclosed tends to show one of the failures listed in para 1.1. The disclosure must be made in the public interest to be protected in law.

6. **Key Persons**

- 6.1. The Committee has overall responsibility for this policy. The Whistleblowing Officer is Damion Gee and can be contacted on 01554 832269 or [admin@ashburnhamgolfclub.co.uk](mailto:admin@ashburnhamgolfclub.co.uk).