



# Whistleblowing Policy

Revision V4.0

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## Introduction

Manvers Waterfront Boat Club is committed to the highest standards of transparency, probity, integrity, and accountability and wants to:

- encourage a culture of openness.
- protect its members.
- to uphold the reputation of the sport.
- and to maintain the public's confidence.

This policy sets out the framework for dealing with allegations of improper conduct both within Manvers Waterfront Boat Club, or within its affiliated sections or events.

Manvers Waterfront Boat Club (MWBC) recognises that the decision to make an allegation can be a difficult one. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to MWBC and/or to those for whom MWBC is providing a service.

**MWBC will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do. As a whistleblower you:**

- **are protected by law.**
- **should not be treated unfairly.**
- **should not lose your job.**
- **not be subjected to victimisation, discrimination, or harassment because you 'blow the whistle'.**

**MWBC will act where a whistleblower is treated badly or threatened or has other action taken against them.**

This policy does not replace other policies and procedures such as the disciplinary and grievance procedure, anti-bullying, or safeguarding policies and specifically laid down statutory reporting procedures. For example, if an employee has a grievance about their working conditions, or a member felt they were being treated unfavourably, they should use the Disciplinary and Grievance procedure. Similarly, if a club member has a concern about the conduct of another member of their club (e.g., that they are not treating individuals with respect) they should raise these with their Club under the Club's constitution in line with Club's Code of Conduct which all members must abide by.

This policy is intended to ensure that the MWBC complies with its duty under the Public Interest Disclosure Act 1998.

1. **Scope** - This policy applies to all MWBC members, volunteers, employees, associates and contractors. This policy applies to, but is not limited to, allegations about any of the following:
  - Breaches of MWBC rules, regulations, codes or policies.
  - Breaches of the Safeguarding Policy.
  - Serious Health and Safety risks e.g. coercing a member to train against medical advice or conducting an unsafe practice.
  - Risk of damage or actual damage to the environment.
  - Conduct which is a criminal offence or breach of the law.
  - Complicity in any of the above matters including the deliberate concealment of any of the above.
  - The unauthorised use of public funds.
  - Fraud and corruption.
  - Abuse of authority or any other unethical conduct.
2. **Confidentiality** - All allegations will be treated in confidence as far as possible, and every effort will be made not to reveal a whistleblower's identity unless the whistleblower agrees. However, if the situation develops and MWBC is not able to resolve the concern without revealing a

whistleblower's identity we will consult with the whistleblower on how they would prefer to proceed before making our decision. MWBC uses every effort not to disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation unless the whistleblower agrees.

3. **Anonymous Allegations** - MWBC encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to address and to substantiate/prove. Allegations made anonymously may be more difficult to action or investigate but anonymous allegations can be considered at the discretion of MWBC's Directors. In exercising discretion to accept an anonymous allegation the following factors are to be taken into account:
  - the seriousness of the issue raised.
  - the credibility of the allegation and
  - whether the allegation can realistically be investigated from factors or sources other than the whistleblower.
4. **Untrue Allegations** - No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the interest of the welfare and wellbeing of the general public to do so, even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation frivolously, carelessly, maliciously or for personal gain.
5. **Procedure for Making an Allegation** - Allegations made against a club member or club officer should be raised with a MWBC Committee member. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that a member of the club committee is involved, it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation directly to the Directors of MWBC.
6. **Allegation** - A whistleblower may make their original report verbally or in writing (email [complaints@mwbc.org.uk](mailto:complaints@mwbc.org.uk)) but should, as soon as possible provide relevant information in writing including:
  - The name of the person making the allegation and their contact details.
  - The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the alleged occurrence).
  - The specific reason for the allegation. Although someone making an allegation will not be expected to prove that it is true, they will need to provide information, to establish that there are reasonable grounds for the allegation. Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure or by an external agency, the right to be accompanied will at that stage be in accordance with the relevant procedure or the rules of the relevant agency.
7. **Action on receipt of an Allegation by MWBC** - the Club Secretary will record details of the allegation, gathering as much information as possible, including:
  - The record of the allegation.
  - The acknowledgement of the allegation.
  - Any documents supplied by the whistleblower.
  - The Club Secretary will ask the whistleblower for their preferred means of communication and contact details and use these for all communications with the whistleblower to preserve confidentiality.
8. **Courses of action depending on their nature** -
  - If the allegation discloses evidence of a criminal offence or financial irregularity it will immediately be reported to the Directors and a decision will be made as to whether to inform the Police.

- If the allegation concerns suspected harm to children or vulnerable adults, the matter will immediately be referred to the Lead Safeguarding Officer who will deal with the matter in accordance with the Safeguarding Policy including informing the appropriate authorities in line with that policy and the matter will proceed in accordance with that policy.
- If the allegation concerns a member of Staff, the matter will be referred to the Directors and will be dealt with in accordance with Staff Disciplinary procedures.
- If the allegation concerns a suspected anti-doping rule violation, the information will be reported to UK Anti-Doping's investigators.
- For any other allegation - if it falls under an existing MWBC policy it will be dealt with in accordance with that policy. In any other circumstances the Directors will decide the appropriate procedure.

9. **Timetable** - The whistleblower will receive an acknowledgement of the allegation in writing from MWBC within five (5) working days with:

- An indication of how MWBC propose to deal with the matter.
- An estimate of how long it will take to provide a final response.
- An indication of whether any initial enquiries have been made.
- Indication whether further investigations will take place and if not, why not.
- Where the allegation has been made anonymously, MWBC will be unable to communicate what action has been taken.
- MWBC will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings MWBC will arrange for them to receive advice about the procedure and advise on the available support mechanisms. The charity Protect supports whistleblowers who call their advice line or complete their online form. More details about this service can be found at [www.protect-advice.org.uk](http://www.protect-advice.org.uk).
- MWBC accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

10. **Responsibility for the Procedure** - the Directors of MWBC have overall responsibility for the operation of this policy and for determining the administrative processes to be followed and the format of the records to be kept.

11. **Monitoring** - A confidential Register, kept by the Club Secretary, will record the following details:

- The name and status (e.g. employee/coach/member) of the whistleblower.
- The date on which the allegation was received.
- The nature of the allegation.
- Details of the person who received the allegation.
- Whether the allegation is to be investigated and, if yes, by whom.
- The outcome of the investigation.
- Any other relevant details.
- The Register will only be available for inspection by the Directors and the Club Welfare Officer.

**Further Information** - some regulatory statutory bodies are listed below. These Regulatory statutory bodies have individual policies and procedures for handling concerns and complaints. Many of their websites contain guidance on issues that you may face which may be helpful in your initial deliberations on whether to make a disclosure.

- The Information Commissioner - In relation to compliance with the requirement of legislation relating to data protection and freedom of information.
- Email: [casework@ico.gsi.gov.uk](mailto:casework@ico.gsi.gov.uk) and the website is [www.ico.gov.uk](http://www.ico.gov.uk).
- The Health and Safety Executive - This relates to the health and safety of individuals at work or the health and safety of the public that is work-related, in connection with those industries and work activities for which HSE is the enforcing authority. Online form: <http://www.hse.gov.uk/contact/raising-your-concern.htm> and the website is [www.hse.gov.uk](http://www.hse.gov.uk).

- The National Society for the Prevention of Cruelty to Children (NSPCC) - Matters relating to child welfare and protection. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Protect - Protect is the UK's whistleblowing charity. They aim to stop harm by encouraging safe whistleblowing. Their free, confidential Advice Line supports more than 3,000 whistleblowers each year. [www.protect-advice.org.uk](http://www.protect-advice.org.uk).