



THE QUEEN'S CLUB

WHISTLE BLOWING POLICY



The Club seeks at all times to conduct its business honestly and with integrity. We expect all those within the Club to maintain high standards and to report any wrongdoing that falls short of these fundamental principles.

The Public Interest Disclosure Act 1999 ('the Act') governs the making of protected disclosures within the workplace. The Act is intended to provide protection from detriment for those who have 'blown the whistle' on alleged bad practice. 'Whistle blowing' is the disclosure of information by an employee or worker which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace.

Procedure

This policy details the circumstances which might give rise to such disclosures and the procedure which should be followed in making a disclosure. This policy is separate to and distinct from the Club's grievance procedure. If an employee has a complaint relating to their own personal circumstances in the workplace, then they should use the grievance procedure. If, however their concern is about malpractice within the Club then they should use the procedure outlined in this policy.

This procedure is open to employees, contractors, trainees, and agency staff ('Relevant Individuals'). If a relevant individual has a genuine concern that there are reasonable grounds for believing that:

- A criminal offence has been committed, is being committed, or is likely to be committed
- A person has failed, is failing, or likely to fail to comply with any legal obligation to which she or he is subject
- A miscarriage of justice has occurred, is occurring, or is likely to occur
- The health and safety of any individual has been, is being, or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information tending to show that any of the above are being or are likely to be deliberately concealed

The procedure outlined below should be followed:

Disclosure to an Appropriate Person

The Club recognises that individuals may not always feel comfortable discussing concerns with their direct Line Managers. It is however the responsibility of all those working within the Club to raise any concerns that they might have about malpractice within the workplace.

The aim of this procedure is to ensure that relevant individuals are confident that they can raise any matters of concern in the knowledge that they will be taken seriously, investigated as appropriate and regarded as confidential.



For the purposes of this procedure individuals should initially raise concerns about any form of malpractice falling within the categories outlined above with the designated Whistleblowing Officer – the QC Welfare Officer or alternatively the Chairman of the Disciplinary Committee who can be contacted via Nicky How, Executive Assistant.

This should ideally be by way of a confidential meeting but may be by telephone or in writing. Employees must specifically state that they are raising concerns under the Whistleblowing Policy. The Designated Whistleblowing Officer will make arrangements for an investigation appropriate to the concerns raised to be carried out and will where possible and appropriate keep the individual advised of what actions will be taken.

Anonymous allegations will not be considered under this policy.

Confidentiality

Where individuals request that the fact that they have made a disclosure is kept confidential, efforts will be made to respect their wishes. In order not to jeopardise the investigation into the alleged malpractice relevant individuals will also be expected to keep the fact that they have raised their concern, the nature of the concern and the identify of those involved, confidential. There may however be circumstances in which a individual's involvement as the discloser of certain circumstances will be essential to the investigation into alleged malpractice.

Relevant individuals will so far as be reasonably appropriate and practicable be kept informed of the progress of an investigation carried out in accordance with this procedure. However, it may not be possible, due to the confidential nature of concerns raised, for example, to provide specific details of the investigation or actions taken. It is not normally appropriate to set a specific time frame within which investigations under this procedure will be completed as the diverse nature of disclosures contemplated under the Act makes this unworkable. However, the Club aims to deal with all disclosures in a timely manner.

The Club undertakes that relevant individuals who raise genuinely held concerns in good faith under this procedure will not be subjected to any detriment as a result. Any individual who believes that they are being subjected to a detriment within the workplace as a result of raising concerns under this procedure should inform HR Manager immediately. Any employee who victimises or retaliates against those who have raised concerns under this policy will be subject to disciplinary action.

If an investigation under this procedure concluded that disclosure has been made in bad faith, the relevant individuals will be subject to disciplinary action.

The Club recognises that there may be matters that cannot be dealt with internally and in this case external authorities will need to be notified and become involved. The Club therefore reserves the right where necessary to make such a referral without obtaining the whistleblower's consent.

