

## Whistle Blowing Policy

GBSA is committed to the highest standards of openness, integrity and accountability. An important aspect of accountability and transparency is a mechanism to enable members, parents and others to voice concerns in a responsible and effective manner. It is a fundamental term that every member will faithfully serve GBSA and not disclose confidential information about the GBSA affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently (although in relatively minor instances the relevant GBSA Director would be the appropriate person to be told).

The Public Interest Disclosure Act gives legal protection to members against being penalised by GBSA or any Club as a result of publicly disclosing certain serious concerns. GBSA has endorsed the provisions set out below to ensure that no members should feel at a disadvantage in raising legitimate concerns. It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by GBSA and/or should it be used to reconsider any matters which have already been addressed under harassment, compliant, disciplinary or other procedures.

### Scope of Policy

This policy is designed to enable GBSA members, parents or individuals to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to other procedures e.g. disciplinary.

These concerns could include:

- Financial malpractice or impropriety or fraud
- Abuse and Harassment
- Discrimination and Inequality
- Failure to comply with a legal obligation or statutes
- Danger to health & safety or the environment
- Criminal activity
- Improper conduct or unethical behaviours
- Attempts to conceal any of these

### Safeguards

Protection- This policy is designed to offer protection to these members of GBSA who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below).

It is important to note that no protection from internal disciplinary procedures is offer to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality –GBSA will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the



information and the individual making the disclosure may need to provide a statement as part of the evidence required.

### **Anonymous Allegations**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of GBSA Exec team. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation of attributable sources

**Untrue Allegations** – If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against the individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against an individual, if they are a member of GBSA

#### **1. Procedure for making a disclosure**

All complaints of malpractice are to be reported a director. Once a complaint is registered, a report will be received and managed by a GBSA Exec team member or the GBSA Safeguarding team

- Complaints of malpractice will be investigated by a member of the GBSA Exec board unless the complaint is against the one of them otherwise may be passed to The GBSA Safeguarding team. This will be at the discretion of the GBSA Chairperson

GBSA will ensure that any internal investigation does not hinder a formal police investigation, should this happen

#### **2. Timescales**

Due to the varied nature of these sorts of complaints, which may involve internal and/or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and marked “confidential”

#### **3. Investigating Procedure**

The investigating officer should follow these steps:

- Full details and clarifications on the complaint should be obtained.

The investigating officer should inform the person who the complaint is made about as soon as is practically possible and a meeting arranged, the person will be allowed to have a Companion present.

The investigating officer should consider the involvement of GBSA auditors and the Police at this stage if this relates to fraud acts of a sexual nature and should consult with the GBSA Directors if appropriate.

- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgment. The report will be passed to the GBSA Exec board or GBSA Safeguarding team
- The Exec Board or GBSA Safeguarding team will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate GBSA procedures.
- The complainant should be kept informed of the progress so the investigations and, if appropriate, the final outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of the GBSA procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the GBSA Safeguarding team , or the GBSA Exec Board.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, GBSA recognises the lawful rights of the members to make disclosures to prescribed persons or body (e.g. the Health and Safety Executive). A full list of prescribed people and bodies can be found on the government website. [www.gov.uk](http://www.gov.uk).

GBSA Exec Board  
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