



HAMPSTEAD GOLF CLUB

WHISTLEBLOWING POLICY

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 third parties with concerns about any aspect of the Club's business to come forward and disclose those concerns. The aim of this policy is to encourage staff and members to raise any serious concerns and to provide reassurance that any disclosures will be dealt with sensitively and in confidence. No employee or member will suffer any detriment or disadvantage as a result of raising an issue.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information (made in the Club's interest) which relates to suspected wrongdoing or dangers within the Club. This may include: criminal offence or activity; bribery; financial fraud; failure to comply with a legal obligation; action that poses a danger to health and safety; damage to the environment; or the deliberate concealment of any of these matters.

Staff and 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.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated, which is subject to our grievance procedures.

PROCEDURES FOR MAKING A DISCLOSURE

Staff and members are encouraged to approach a member of the Management Committee with any concerns in the first instance. It is hoped that in the majority of circumstances, this informal approach will satisfy any concerns someone may have.

If in the circumstances it would be inappropriate to raise the concern with a member of the Management Committee, or the seriousness and sensitivity of the matter require it, staff and members are encouraged to raise the issue with the Club's Chairman and/or the Disciplinary Member.

You will be asked to set out the concern in writing, detailing the basis of your concerns and the desired outcome. You then be invited to attend a meeting to discuss the disclosure further, at which you may bring a colleague or a friend as a companion to the meeting.

This policy courtesy of - National Golf Club's Advisory Association (NGCAA)

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The Chair/Disciplinary member shall then commence a full investigation into the disclosure. This shall take place within a reasonable time frame. Once the investigation has been concluded, you will be updated in relation to the outcome and any action taken as a result of the investigation.

If you are not satisfied with the outcome, you may wish to refer the matter to another individual 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 website www.pcaw.co.uk. Only in some circumstances will the law protect you if you make a disclosure to an external person. You are therefore encouraged to report internally following the procedures above.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

Any reporting employee or member shall not suffer any detrimental treatment as a result of raising a concern.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising the concern. If you believe that you have suffered any such treatment, you should inform a member of the Management Committee immediately. If the matter is not remedied you should raise it formally using our Disciplinary Procedure.

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 you in advance.

A whistleblower must have a reasonable belief that the information disclosed tends to show one of the failures listed above in the section “What is Whistleblowing?” The disclosure must be made in the public interest to be protected in law.