



Minchinhampton Golf Club

Whistleblowing Policy

Introduction

Minchinhampton Golf Club (MGC) is keen to ensure that any discrimination, harassment, fraud, misconduct, unethical behaviour or wrongdoing by Members, employees or third parties are reported and dealt with properly and fairly by the Club.

MGC therefore encourages all individuals to raise any concerns that they may have about the conduct of others at the Club or the way in which the Club is run.

Whistleblowing is the disclosure of information relating to illegal, unethical, or unacceptable conduct and may include:

- Criminal behaviour
- Failure to comply with any legal, professional or regulatory obligation
- Actions causing danger to health and safety; bribery or corrupt activity
- Financial fraud
- Significant mismanagement
- Behaviour that harms or could harm the reputation of the Club or its financial wellbeing
- Behaviour that affects individuals' well-being (harassment/ intimidation/ bullying etc)
- Damage to the environment (fauna or flora)
- Any attempt to cover up any information relating to the above.

Policy

This Policy aims to encourage Members and employees to report suspected wrongdoing as soon as possible and ensure they are aware such a policy exists, how they can make a disclosure and ensure they are protected from any sanction, unless any accusation proves to be malicious or unfounded.

The Club will take appropriate action to protect Members or employees from victimisation, discrimination, dismissal or censure when an issue is raised in good faith.

Procedures

Any whistleblowing issues should be reported to the General Manager, then referred to either the Chair of the Board or Chair of Risk Committee depending on the topic, and a formal record will be raised.

The Chair of the Board or the Chair of Risk Committee will decide how the issue should be resolved and a record will be kept of any decision made.

Guidance will be sought from professional bodies (eg, England Golf) if considered necessary by the respective Chair.

Where appropriate, issues will be reported to the Risk Committee unless considered confidential and then it will be restricted to Board reporting.

Complaints & Disciplinary

The Club will follow the procedures of England Golf, adopting detailed procedures in sympathy with Club circumstances at the time of any complaint. Please see England Golf regulations for detailed guidance.

To ensure consistent application of every disciplinary issue, from any Section of the Club or the membership, any complaint must be in writing and placed before the General Manager in the first instance. A record will be kept for each written instance reported.

The General Manager acts as the Club Compliance Department and will investigate the complaint either to resolve matters or to refer it to the Vice Chairman of the Board for further consideration. See MGC's Disciplinary Policy for more details.

Version Control:

Version	Risk Committee review date	Board endorsement date	Changes
V1		June 2017	
V2.0	12/01/2022		Annual Review
V2.0		31/01/2022	Board Approved – no changes