

## **Minchinhampton Golf Club Whistleblowing Policy**

Meta Policy covering Whistleblowing, Bribery and Corruption, Diversity and Inclusion

It is important that any discrimination, harassment, any 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 it is run.

### **Whistleblowing**

#### **Definition**

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

Criminal behaviour, failure to comply with any legal, professional or regulatory obligation, danger to health and safety, bribery, financial fraud or mismanagement, behaviour that harms or could harm the reputation of the Club or its financial wellbeing, damage to the environment (fauna or flora) or any attempt to cover up any information relating to the above.

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.

#### **Procedure**

- Any whistleblowing issues raised will be referred to either the Chair of the Board or Chair of Risk Committee 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.
- Where appropriate issues will be reported to the Risk Committee.

## **Bribery & Anti-Corruption**

The club wishes to ensure that its affairs are conducted fairly and lawfully and to avoid improper inducements or inappropriate practices that might constitute bribery or corruption.

Bribery is an act of offering, giving or accepting money or gifts or other advantage that induces the recipient to act improperly or rewards them for acting improperly. Corruption is the abuse of entrusted power for personal gain.

It is not acceptable for any employee or officer to:

- Give, promise or offer payment for business advantage
- Accept payment, gift or hospitality with the expectation of business advantage

From time to time, gifts or hospitality may be offered and accepted from suppliers or third parties, especially if they support charitable purposes and are not regarded as an inducement to secure business advantage.

All such gifts or hospitality must be recorded in a Hospitality register with an estimate of financial value. Any item over £50 must be approved by the Chair of the Board, Treasurer or Chair of Risk.

The Register should be reviewed annually by the Risk Committee.

## **Diversity and Inclusion Policy**

The Club promotes equal opportunity to all employees and job applicants as well as to all members and prospective members and visitors to the Club. It will not discriminate on the grounds of their sex, pregnancy/maternity leave, gender assignment, race, disability, sexual orientation, age, religion or belief.

The Club will not tolerate discrimination / harassment /or bullying by employees, members, contractors or visitors.

Harassment / bullying is any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating the victim's dignity or creating an intimidating, hostile, degrading, humiliation or offensive environment.

The Club is committed to providing an environment free from unlawful harassment / bullying on grounds outlined above, for employees, members, their guests and visitors.

This policy also links to the Club's Safeguarding Policy and applies equally to Junior members as to all other categories of membership.

Anyone who feels they have been discriminated against or harassed, should contact the Deputy Chair of the Board or Chair of the Risk Committee.

Those who report concerns in good faith will suffer no detriment and be treated confidentially and sensitively. In the unlikely event that any grievance is found to have been false or brought in bad faith, other action or sanctions will be considered.

A confidential record of any issues raised will be kept by the Risk Committee.

Any issues raised will be considered for action by a committee comprising any two of: The Deputy Chair, Chair of the Risk Committee or a Board member unless any are involved in the complaint.

This policy is effective from June 2017.