



<b>SECTION</b>	<b>HR</b>
<b>POLICY /PROCEDURE</b>	<b>Whistleblowing</b>
<b>DATE OF CREATION</b>	<b>12<sup>th</sup> April 2016</b>
<b>VERSION</b>	<b>5</b>
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<b>DATE OF REVIEW</b>	<b>01<sup>st</sup> July 2024</b>

Club Doncaster as whole organisation is committed to conducting our business in a responsible way and to ensuring that the public interest is safeguarded.

The purpose of this Policy is to encourage our employees to raise legitimate concerns in a responsible way where they believe that there has been some form of malpractice.

Concerns should only be raised in good faith and should not be raised to further a personal grievance or private dispute (where appropriate, such matters should be dealt with through our grievance procedure).

Victimising employees who make a disclosure or deterring them from raising a genuine concern about fraud, corruption, malpractice or unethical conduct will constitute a serious disciplinary offence.

Abuse of this procedure by maliciously or mischievously raising unfounded allegations, either internally or externally, will be regarded as a serious disciplinary offence.

Where an allegation is made, the person or persons against whom the allegation is made shall be informed of the allegation and the evidence supporting it, and shall be allowed to comment before the investigation is completed.

Any allegation of malpractice shall be treated in the strictest confidence and investigated immediately. The identity of the individual raising the complaint shall not be disclosed to the alleged perpetrator of malpractice without that individual's prior approval, unless this is incompatible with a fair investigation. You will be informed of the need to disclose your identity in any event.

Any disclosure made under this Policy must be in good faith. If you make an allegation you must have a reasonable belief that the allegation is true and it must not be made for personal gain. If the allegations relate to a matter which you could raise as a grievance you may if you wish raise them as a grievance following the statutory grievance procedure. Alternatively, you should follow the procedure below.

This procedure applies to the following allegations:

- that a criminal offence has been, is being, or is likely to be committed;

- that a person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject;
- that a miscarriage of justice has occurred, is occurring, or is likely to occur;
- that the health and safety of any individual has been, is being, or is likely to be endangered;
- that the environment has been, is being, or is likely to be damaged;
- that information tending to show any matter falling within one of the above categories has been, is being, or is likely to be deliberately concealed.

In the first instance, you should make any allegation covered by this procedure in writing to your Manager or such other person as may be appropriate or we may from time to time specify.

A record will be made of receipt of the disclosure and we will either investigate the disclosure or arrange for an appropriate member of the senior management team to do so.

Once the investigation is completed, we will inform you, subject to any third party rights, of the outcome of the investigation.

If you have any concerns or complaints about the manner in which you feel you are being treated because you made the disclosure, whether by the alleged wrongdoer or by any colleagues, you should raise this with a member of the senior management team and it may be dealt with as a disciplinary matter in relation to such individuals.

If you are dissatisfied with the outcome of the investigation or feel unable to report it to your Manager in the first instance, disclosure should be made in writing to the People & Culture Department, who will investigate the matter and report back to the individual concerned, and if appropriate involve the Senior Executive Committee or any relevant external stakeholders.