

Tewkesbury Junior Anglers

Tewkesbury Junior Anglers (TJA) Whistleblowing Policy (Raising Concerns)

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1. Introduction and Statement about Whistleblowing

Tewkesbury Junior Anglers (TJA) is committed to maintaining the highest standards of integrity, honesty, and accountability in all its activities. We encourage a culture of openness where volunteers and those connected with TJA feel safe and confident to raise serious concerns about suspected wrongdoing, risk, or malpractice within the organisation, without fear of victimisation or reprisal.

This policy outlines how individuals can raise such concerns (known as "whistleblowing" or "making a disclosure") and how TJA will respond. We take all genuine whistleblowing concerns seriously and will investigate them appropriately.

2. Purpose and Scope

- Purpose: The purpose of this policy is to:
 - Encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected where possible.
 - Provide clear guidance on how to raise concerns and how TJA will respond.
 - Offer reassurance that individuals will be protected from reprisal or victimisation for raising a genuine concern in good faith under this policy.
 - Help TJA identify and address any malpractice, thereby maintaining public confidence and protecting our members and resources.
- Scope: This policy applies to all TJA committee members, volunteers, coaches, helpers, and any individuals performing duties on behalf of TJA. It covers concerns about suspected wrongdoing related to TJA's activities, management, or resources that are in the public interest.

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3. What is Whistleblowing? (Qualifying Disclosures)

Whistleblowing is the disclosure of information which the individual genuinely believes tends to show one or more of the following types of wrongdoing, risk, or malpractice has occurred, is occurring, or is likely to occur within TJA:

- A criminal offence (e.g., fraud, theft, bribery).
- A failure to comply with any legal or regulatory obligation (e.g., serious breach of Health & Safety law, Data Protection law, or safeguarding legislation).
- A miscarriage of justice.
- Danger to the health and safety of any individual (e.g., unsafe practices putting children or volunteers at risk).
- Damage to the environment (e.g., pollution caused by TJA activities).
- Serious failures in TJA's safeguarding procedures or child protection practices not being adequately addressed through normal reporting channels.
- Serious breaches of TJA's core policies (e.g., significant financial mismanagement, serious and persistent discrimination or harassment, deliberate disregard for the Equality & Diversity Policy).
- The deliberate concealment of information relating to any of the above.
- This policy is distinct from TJA's grievance procedures. Personal grievances (e.g., disputes about your volunteer role, interpersonal conflicts not related to the above list, or complaints about the quality of service not involving wrongdoing) should be raised through discussions with a Committee Member or via procedures outlined in other TJA policies (such as the Equality & Diversity Policy). If you are unsure whether a concern falls under whistleblowing or another procedure, you can seek advice from the TJA Committee Chair or Secretary.

4. Protection for Whistleblowers

TJA is committed to ensuring that no individual who raises a genuine concern in good faith under this policy will suffer any harassment, victimisation, or detrimental treatment (e.g., being treated unfairly or excluded) as a result. We will support individuals who raise genuine concerns, even if their concerns are ultimately found to be mistaken after investigation.

However, if an individual is found to have knowingly raised a false or malicious allegation, TJA may consider taking action under its Behaviour Management Policy / Code of Conduct or other relevant disciplinary procedures.

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5. Confidentiality

TJA will treat all disclosures made under this policy with discretion. We will make every effort to keep the identity of a whistle-blower confidential if they request it, provided this does not hinder an effective investigation. There may be circumstances where it is not possible to maintain full confidentiality (e.g., if the matter leads to legal proceedings or requires disclosure to external agencies). If this is the case, we will discuss this with you.

You may raise a concern anonymously. However, anonymous disclosures can be more difficult to investigate effectively (e.g., if further information is needed) and make it harder for us to provide you with feedback or offer protection. We encourage you to provide your name when raising a concern.

6. Procedures for Raising a Concern (Internal Disclosure)

TJA encourages individuals to raise concerns internally in the first instance.

- Step 1: Who to Contact
 - Concerns should normally be raised with the TJA Committee Chair or the TJA Secretary.
 - If your concern relates to either of these individuals, or you feel unable to approach them for any reason, you can raise your concern with another TJA Committee Member.
 - If your concern primarily relates to safeguarding and you feel other channels are inappropriate for this specific disclosure, you may raise it directly with TJA's Named Safeguarding Lead, Christopher Birch.
- Step 2: How to Raise a Concern
 - Concerns can be raised verbally or in writing (email or letter). Written concerns are often helpful for clarity and record-keeping.
 - Please provide as much information as possible, including:
 - The nature of your concern (what kind of wrongdoing you believe is occurring).
 - The reasons for your concern, including any background and history.
 - Names of individuals involved (if known and relevant).
 - Dates, places, and any supporting evidence you may have.
 - Whether you have raised this concern with anyone previously.
 - Whether you wish your identity to be kept confidential.

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- Step 3: TJA's Response to a Disclosure
 - Acknowledgement: The person you reported your concern to will acknowledge receipt, normally within five (5) working days.
 - Initial Assessment: The concern will be assessed to determine if it falls under this Whistleblowing Policy, or if it should be handled under a different procedure (e.g., grievance, safeguarding referral).
 - Investigation: If it is determined to be a whistleblowing concern, the TJA Committee (or designated impartial Committee Members not implicated in the concern) will decide how to proceed. This may involve an internal investigation, discussion, or referral to an external body if appropriate. Investigations will be conducted as sensitively and swiftly as possible.
 - Timescales: We aim to inform you of how we intend to deal with the matter within ten (10) working days of the initial assessment. We will endeavour to provide you with periodic updates on the progress of any investigation, although the level of detail may be limited by confidentiality considerations.
 - Feedback: Subject to legal and confidentiality constraints, you will be informed of the outcome of any investigation and what action (if any) has been taken. If no action is to be taken, an explanation will be provided.
 - Support: TJA will consider what support may be appropriate for you during this process.

7. External Disclosures

While TJA encourages internal reporting first, we recognise that there may be exceptional circumstances where you might feel it necessary to raise a concern externally. The Public Interest Disclosure Act 1998 provides protection for employees who make disclosures to certain "prescribed persons" or bodies.

If you have raised a concern internally but are not satisfied with the response, or if you feel you cannot raise the matter internally, you may consider contacting an appropriate external body such as:

- The Information Commissioner's Office (ICO) – for data protection breaches.
- The Health and Safety Executive (HSE) – for health and safety risks.
- The Environment Agency – for environmental damage.
- The Charity Commission – if TJA is a registered charity and concerns relate to its governance or management.
- The NSPCC or Local Authority Designated Officer (LADO) / MASH – for child protection concerns.
- The Police – for suspected criminal activity.

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- If you are considering an external disclosure, you are strongly encouraged to seek independent advice (e.g., from Protect – a whistleblowing charity, or a legal advisor) to ensure your disclosure is protected.

8. Monitoring and Review

The TJA Committee is responsible for monitoring the effectiveness of this policy. This policy will be reviewed annually, or sooner if required by changes in legislation or TJA's circumstances, to ensure it remains fit for purpose.