SAMA 82	Controlled Document

The South Atlantic Medal Association (1982)

WHISTLEBLOWING POLICY

Policy Number	26
Document Owner	SAMA (82)
Ratifying Body	Board Of Trustees
Policy Lead	Brian Sherrington
Available (upon approval) to	Members and Volunteers
Next Scheduled Review Date	11/11/2029

POLICY CONTEXT & REQUIREMENT

This policy has been developed to protect the organisation, employees, trustees, membership and volunteers by ensuring there is a robust and clear set of guidelines with regard to the management of whistleblowing

Version Control				
Version	Author	Status	Date	Change Detail
2.0	Andrew Lockett	Implemented	11/11/24	N/A
2.1	Alan Dodsworth	Implemented	19/08/2026	New Front Page, Policy Lead & Version Control

1. **Introduction**
   1.1 Reference:
      1.1.1 The Public Interest Disclosure Act 1998
      1.1.2 The Enterprise and Regulatory Reform Act 2013
2. **SAMA 82 is committed to the highest standards of openness, probity and accountability.**
   2.1 This policy is about making a disclosure in the public interest.
   2.2 Employees may receive compensation if they are wrongly discriminated against for disclosure in the public interest.
   2.3 In this Document the association has included non-employees such as members, volunteers and beneficiaries although they will not benefit from the compensation provision listed in the 1998 act.
   2.4 Employees, members, volunteers and beneficiaries
      2.4.1 Whilst it is the duty of every employee (and members and volunteers) not to disclose confidential information about the association's business; should a discovery of activities of a serious malpractice or wrongdoing occur they should be able to disclose information of a public interest nature to trustees without fear of reprisal.
   2.5 The Public Interest Disclosure Act gives legal protection to employees over a disclosure of such information.
3. **Disclosure**
   3.1 Where an employee, member, volunteer or beneficiary discovers information that shows serious mal-practice or wrong-doing that is in the public interest they should contact their overseeing trustee or the chairman and explain their concerns.
   3.2 No employee, member, volunteer or beneficiary should expect or receive disadvantage or adverse treatment through their disclosure.
   3.3 This process should not be used for the purpose of harassment, complaint, disciplinary or other procedures.
4. **Scope of Policy**
   4.1 This policy is designed to enable employees and others of the association to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety such as:
      4.1.1 financial malpractice or impropriety or fraud,
      4.1.2 failure to comply with a legal obligation,
      4.1.3 serious non-compliance related to Health & Safety or the environment,
      4.1.4 criminal activity,
      4.1.5 improper conduct or unethical behaviour,
      4.1.6 activities leading to a serious issue in contravention of Charity Commission requirements,
      4.1.7 modern slavery,
      4.1.8 attempts to conceal any of those above.
5. **Safeguards**
   5.1 Protection - this policy is designed to offer protection to those employees, volunteers, members and beneficiaries who disclose such concerns provided the disclosure is made:
      5.1.1 in good faith,
      5.1.2 to an appropriate person such as a trustee or the chairman,
      5.1.3 in the belief that there are good grounds to make such a disclosure,
      5.1.4 not motivated by self-interest.
      5.1.5 On the basis that it is in the public interest for such information to be disclosed.
   5.2 Persons making disclosures not compliant with the criteria above may be subject to a disciplinary procedure.

6. Confidentiality

6.1 The association will treat such disclosures as confidential.

6.2 The Identity of the informant will be withheld but may become evident or need to be released if there is an investigation.

7. Anonymous reports

7.1 Employees, members, volunteers or beneficiaries are encouraged to submit a disclosure in their name. Disclosures expressed anonymously are much less credible but may be considered based on:

7.1.1 seriousness of the issues,

7.1.2 credibility,

7.1.3 likelihood of confirming the allegation from other sources.

8. Vexatious Reports

8.1 Employees, members, volunteers or beneficiaries are cautioned against making such reports as these may lead to disciplinary measures.

9. Procedures for Making a Disclosure

9.1 A report may be made orally or in writing. Persons who make a report orally are expected to confirm the written record of their report as a true version of what they believe has happened.

9.2 A report will be investigated by the appropriate trustee who is not implicated in the complaint. Where the complaint is against trustees as a body then a third party such as an experienced member/s will be appointed to investigate and report.

9.3 Where the disclosure is of criminal activity, the information will be passed to the appropriate regulators for the association and the police.

9.4 The Trustees intend to address any disclosure as quickly as possible, but this will not override the requirement for thoroughness and the appropriate communication with regulators and law enforcement bodies.

9.5 Trustees shall keep the informant up to date with developments where it is in the best interests of the investigation. Such information will be passed as confidential to an address provided by the informant. Such communication shall be marked confidential.

9.6 The investigating trustee shall heed the advice or direction of regulators and the police.

9.7 The investigation shall conclude with an action plan and recommendations.

10. The Process

10.1 The investigating officer should follow these steps:

10.1.1 document oral disclosures so that they are placed on record and agreed with the person disclosing,

10.1.2 assimilate the written disclosures,

10.1.3 interview the informant and determine any other information,

10.1.4 full details, clarifications and settings for the nature of the wrong going or malpractice shall be determined,

10.1.5 the investigating officer shall inform the subject implicated in the disclosure as soon as practicable,

10.1.6 the person or persons implicated shall be afforded a friend or supporter at any interviews and at the discretion of the investigator a legal representation may be allowed,

10.1.7 the investigating officer shall consult with relevant outside bodies and trustees as is necessary,

10.1.8 the allegations should be fully investigated by the investigating officer with the assistance, where appropriate, of other individuals / bodies,

10.1.9 the findings of the investigation shall be documented with recommendations and an action plan with suitable justification,

10.1.10 the complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome,

10.1.11 if appropriate, a copy of the outcomes will be used to enable a review of Company procedures,

10.1.12 if the findings result in disciplinary action of legal action against an individual or group then this shall be conducted in accordance with the disciplinary procedures.

10.2 The lessons learned from the findings shall be incorporated in the association's procedures.