

# Guidance for individuals

## Raising a concern

Members of staff are often the first to realise that there may be something seriously wrong within their organisation. However, they may not wish to speak up because they may feel disloyal towards colleagues and their employer if they do so. They may also be concerned that they will be subject to victimisation or harassment if they speak out, or may feel it is easier to ignore their concerns if they only have an inkling or suspicion that something may be wrong.

Ramsey Golf Club Limited (RGCL) is committed to ensuring that all of us have a safe, reliable and confidential way of reporting any suspicious activity. Every member of staff should know how they can raise concerns.

We all have a responsibility to help detect, prevent and report instances of wrongdoing. If you have a concern regarding a suspected instance of noncompliance, please speak up – your information and assistance will help.

## What concerns should be raised under this policy?

As a general guide, you should report your concerns if you consider it would be in the public interest to stop the malpractice and, if appropriate, for sanctions to be applied.

Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern. Wherever possible provide information (facts) in your disclosure.

You may discuss your concern with a work colleague, who may also have knowledge of the matters you wish to raise, and you may consider making a joint disclosure. The earlier you express your concerns, the easier it will be to take action and to minimise any negative impact on RGCL.

Issues which should be raised under this policy, and the list is not exhaustive, are where there is a suspicion or direct evidence that the following have been, are being, or are likely to be, committed by a fellow member of staff:

1. a criminal offence or activity
2. fraud
3. financial mismanagement or corruption
4. physical or emotional abuse
5. health and safety issues concerning the workplace that puts the safety of workers or visitors at risk
6. undue favour shown, either on a contractual matter, or to a job applicant
7. bad working practice
8. breaches of legislation (eg Health and Safety, Data Protection Act)
9. risks to the environment (eg dumping damaging material)
10. concealment of any of the above

11. payments in exchange for awarding contracts and/or offering, taking or soliciting bribes (Whistleblowing in regard to bribery needs to be reported as per the Whistleblowing procedure **and** Anti-Bribery Procedure

For any issues not listed here, you should use your judgment as to whether to take action under this policy. If in any doubt, you are advised to follow the terms of this policy and make a disclosure. Should your report relate to issues outside its scope, you will be advised accordingly.

### **With whom should your concerns be raised?**

You are encouraged in the first instance to raise your concern with your line manager. If, however, you do not feel confident using this avenue, there are other safe alternatives.

The Club Manager or a Board member. You should refer your concerns to them in the event that you do not wish to report the issue to your manager. You are encouraged to disclose your name to the one of the above whenever possible. If you have other queries in this regard please contact the Board Chairperson. Your query will be dealt with on a confidential basis.

- If the concern involves the Club Manager you should contact a Board member
- If the concern involves a Board member you should contact another Board member

If you require further advice you may wish to contact the Manx Industrial Relations Service (MIRS). This is an independent and impartial service which is available free of charge to any individual or organisation. Any discussions held with MIRS are confidential.

Alternatively you may seek advice from the UK independent charitable body Public Concern at Work. This organisation operates a helpline and can be contacted by telephone on 0207 404 6609 or by email at [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). Public Concern At Work will give free, independent, confidential advice at any stage of the process, but may not be familiar with Isle of Man legislation or our Governmental system. Information given to a helpline will not constitute legal notification to the organisation.

### **How should you raise your concern?**

You are encouraged to raise any concerns verbally with your line manager or a RGCL Board member in the first instance. Although you are not expected to prove an allegation, you will need to demonstrate that there are sufficient grounds for your concern.

Concerns are best raised in writing, though they can also be expressed verbally eg through a telephone call. As much information as possible should be given, which should include:

1. the background to the concern
2. name/s of individual/s involved

3. details of dates and places where the malpractice occurred or is likely to occur
4. the reasons why you are particularly concerned/making the disclosure (ie ground for suspicions)

If you raise your concern formally by invoking the policy with your line manager or Board member, a record should be made of the key details and a copy may be shared with you.

You are encouraged to provide your name when you make a disclosure under this policy. Your identity can be protected and confidentiality will be respected if subsequent action is taken.

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