Whistleblowing Policy GSB AA GB (registered charity number 226745) Version: Reviewed Nov 2026

1. The Policy

1.1 This policy does not form part of any contract of employment or terms of engagement and it may be amended by the General Service Board (GSB) of AA GB (GSB) from time to time.

1.2 The Policy covers all individuals irrespective of their status including all employees, Trustees, sub-committee members, other volunteers, officers, managers, part-time and fixed-term workers, and casual and agency employees (collectively referred to as '**staff**' in this policy).

1.3 This is the policy of the GSB regarding the protection against victimisation or dismissal for staff who blow the whistle on criminal behaviour. misconduct or wrongdoing of staff or others working on behalf of the GSB.

1.4 This Policy should not be used for complaints relating to your own personal circumstances – for example employees with complaints about treatment at work by his/her/their line manager should be dealt with under the Staff Grievance Policy.

1.5 References to 'you' or 'your' refer to any member of staff to whom this Policy applies.

2. Introduction

2.1 The aims of this Policy are:

2.1.1 to encourage a culture of openness and accountability;

2.1.2 to encourage staff to report suspected wrongdoing;

2.1.3 to give staff the peace of mind that their concerns will be taken seriously and investigated, and that their confidentiality will be respected and jobs / roles will be safe - even if the concerns turn out to be mistaken; and

2.1.4 to provide staff with guidance on how to raise those concerns.

3. General Principles in Summary

3.1 You will not suffer as a result of raising a disclosure at work or in carrying out activities on behalf of the GSB - you will not be victimised, disciplined or dismissed for raising a protected disclosure and under the procedure set out below. Detriment caused to you by others will be a disciplinary offence and will be dealt with under the Disciplinary Policy. Other staff may be subject to other appropriate sanctions.

3.2 You could be committing a wrongdoing by not making a disclosure and covering up someone else's wrongdoing. Never agree to remain silent about a wrongdoing, even if told to do so by a person in authority, such as your line manager.

3.3 Your right to make a protected disclosure under this procedure overrides any confidentiality provisions in your contract of employment (if you are employed by the GSB).

3.4 Maliciously making a false allegation or making an allegation with a view to personal gain is a disciplinary offence.

4. Qualifying for Protection

4.1 Examples of whistleblowing when staff will qualify for protection from victimisation or dismissal for disclosure of information:

4.1.1 a criminal offence, including offences such as theft, fraud or acts of bribery

4.1.2 financial impropriety of any kind

4.1.3 a failure to comply with a legal obligation

4.1.4 a miscarriage of justice

4.1.5 an act creating risk to health and safety

4.1.6 deliberate concealment of information relating to any of the above.

4.2 A whisleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns relating to suspected wrongdoing or danger affecting any of our activities you should report it under this Policy.

5. Reporting Procedure

It is important that you are aware of the procedure that will generally be followed should you wish to disclose information regarding the above.

5.1 In the first instance staff should normally raise concerns and disclose information to the General Secretary based at GSO 10 Toft Green York.

5.2 Where the matter to be disclosed relates to the General Secretary or other GSO managers, you may raise the matter with any trustee on the Executive Committee or a nominated non-alcoholic Trustees, as appropriate.

5.3 The investigation will take place as quickly as reasonably possible by either the General Secretary (or if appropriate, a Trustee agreed by the Executive

Committee of the Board) and may involve you and other individuals involved giving a written statement, and you may be asked to comment on any additional information.

5.4 Any investigation will be carried out in accordance with the principles outlined above and will normally be concluded within 14 working days (depending on the extent of the disclosure).

5.5 The General Secretary (or, if appropriate, the respective Trustee) will take any necessary action, including reporting the matter to the chair of Trustees of the GSB and any appropriate government department or regulatory body.

5.6 The General Secretary (or, if appropriate, the respective Trustee) will notify you in writing of the outcome of the investigation, and what the GSB has done or proposes to do. If no action is to be taken, the reason for this will be explained. Where investigations exceed 7 days you will be notified as to the progress and status of the matter.

5.7 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe you have suffered such treatment, you should inform the General Secretary (or respective Trustee) or other GSO managers immediately.

5.8 The disclosure must be made in good faith and the individual raising the concern must have reasonable suspicion that the alleged criminal behaviour, misconduct or wrongdoing has occurred, is occurring or is likely to occur. If we conclude that a whistleblower has made false allegations, maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

5.9 If, on conclusion of the investigation, you reasonably believe that the appropriate action had not been taken, you may then report the matter externally to an appropriate external authority. The Public Interest Disclosure legislation sets out a number of prescribed external bodies or persons to whom qualifying disclosure may be made. Another source of help is an independent Whistleblowing charity, "*Public Concern at Work*," which operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. <u>You are strongly encouraged to take advice before making external disclosures as a failure to follow the statutory procedure could mean that your employment rights are not protected if you are an employee of the GSB.</u>

6. Approval

This policy was approved by the Board of Trustees on: 14th May 2022

The next review is due by: November 2028