Whistleblowing Policy

STAFF POLICY - Version Control

Date	Author/Review	Comments
September 2014		
November 2020	JB	Reformatted and comments
July 2021	JB	Reformatted
2.8.21.	SST Review	Approved
December 2023	HR/SST	Reviewed, no changes to whistleblowing legislation – SST to review
April 2024	SST Sign Off	SST Approved
October 2026	ANS	Changes to Law

Next Review date: April 2028

Introduction
It is important that any fraud, misconduct or wrongdoing by staff or others working on behalf of CAMRA is reported and properly dealt with. We therefore require all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which it is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

Background
If you suspect wrongdoing any disclosure must be in the public interest. This means it must affect others, for example the general public. As a whistleblower you're protected by law - you should not be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

You are protected by law if you report any of the following:

- A criminal offence, for example fraud
- Someone's health and safety is in danger
- An act causing damage to the environment
- Risk or actual damage to the environment
- A miscarriage of justice
- The company is breaking the law, or failing to comply with a legal obligation
- Sexual harassment has occurred, is occurring, or is likely to occur

- You believe someone is Deliberately concealing information relating to any of the above matters

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter as it is CAMRA's responsibility to ensure that an investigation takes place.

From 6 April 2026, sexual harassment is expressly recognised as a qualifying disclosure under whistleblowing legislation. Workers who make disclosures regarding sexual harassment, in the public interest and in accordance with the requirements of the Employment Rights Act 1996, are protected from detriment and unfair dismissal.

Personal grievances

Sexual harassment and whistleblowing
Whilst personal grievances will normally be dealt with under CAMRA's Grievance Procedure, concerns regarding sexual harassment may constitute a protected disclosure where the matter is in the public interest or affects other workers, volunteers, members, contractors or the wider public.

Individuals may choose to report concerns regarding sexual harassment through:

- CAMRA's Grievance Procedure
- CAMRA's Bullying and Harassment procedures; or
  This Whistleblowing Policy where the matter meets the statutory definition of a qualifying disclosure

CAMRA will ensure that individuals reporting sexual harassment under this policy are protected from victimisation, retaliation, detriment or unfair treatment for making a protected disclosure.

Choosing the Appropriate Procedure
Concerns about an individual's own employment or treatment should normally be raised through the Grievance Procedure. Concerns relating to suspected wrongdoing, misconduct, legal breaches, fraud, safeguarding, or matters affecting the wider organisation or public interest should normally be raised under the Whistleblowing Policy. Where there is uncertainty, the organisation will determine the most appropriate process.

Whistleblowing Policy

Principles
Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of CAMRA should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.

No employee or other person working on behalf of CAMRA will be victimised for raising a matter under this procedure. There will be no prejudice of any nature as the individual has raised a legitimate concern.

Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence. If misconduct is discovered as a result of any investigation under this procedure, our disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority, you should not agree to remain silent. You should report the matter to the Chief Executive or the chair of the National Executive.

If you have concerns about a breach of your own staff contract of employment this should be raised through the Grievance Procedure. If you report your concern to the media, in most cases you may lose your whistleblowing legal rights.

CAMRA recognises that whistleblowing disclosures can relate to safeguarding concerns, equality matters, sexual harassment, fraud, governance failures, financial misconduct, health and safety risks, environmental damage and breaches of legal or regulatory obligations. All such concerns will be taken seriously and investigated appropriately.

Process
The process for whistleblowing is as follows:

Stage one
In the first instance, any concerns should be raised with the Chief Executive, who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in

accordance with the principles set out above. Your statement will be considered and you will be asked to comment on any additional evidence obtained. The Chief Executive will take any necessary action, including reporting the matter to the Chair of the National Executive and any appropriate government department or regulatory agency. The Chief Executive will also invoke any disciplinary action required. On conclusion of any investigation, you will be told the outcome and what has been done or will be done. If no action is to be taken, the reason for this will be explained.
Where allegations relate to sexual harassment, safeguarding concerns, discrimination or other sensitive matters, CAMRA may appoint an independent investigator or seek external professional advice to ensure impartiality and confidentiality.

Stage two
If you are concerned that the Chief Executive is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should escalate the matter to the Chair of The National Executive.

The Chair will arrange for the investigation to be reviewed, make any necessary enquiries, and report their findings and recommendations to the National Executive or other appropriate body.

Where the concern relates to the Chair of the National Executive, the matter should be reported to the Vice-Chair of the National Executive, who will determine the most appropriate course of action and, where necessary, arrange for an independent investigation.

Where the concern relates to a Director of the National Executive, the matter should be reported to the Chair of the National Executive unless the Chair is directly involved in the matter or has a conflict of interest. In such circumstances, the matter should be reported to the Vice-Chair or an independent external investigator appointed for that purpose.
Where the concern involves multiple members of the Senior Leadership Team, the Chief Executive, the Chair, or several members of the National Executive, such that an independent internal review may not be possible, the matter may be referred directly to an appropriately qualified independent external investigator or adviser. Any individual with an actual or perceived conflict of interest will take no part in the consideration, investigation, or determination of the matter.

CAMRA will ensure that there is always an independent reporting and oversight route available for whistleblowing concerns and that disclosures are handled impartially, fairly, and without conflict of interest.

Whistleblowing Policy

Stage three
If, on conclusion of Stages 1 and 2, you reasonably believe that the matter has not been adequately addressed, that appropriate action has not been taken, or that there are reasonable grounds for concern that the issue remains unresolved, you may make a disclosure to an appropriate prescribed person or regulatory body.

In certain circumstances, it may also be appropriate to make a disclosure without first completing all internal stages, for example where you reasonably believe:

- the matter is exceptionally serious;
- there is a risk that evidence may be concealed, destroyed or altered;
- you may be subjected to detriment or victimisation for raising the concern internally;
- there is a conflict of interest affecting those responsible for handling the concern; or
- internal reporting is unlikely to result in the matter being properly investigated.

Examples of prescribed persons and bodies include:

- HM Revenue & Customs
- the Health and Safety Executive
- the Environment Agency
- the Serious Fraud Office
- the Charity Commission
- the Pensions Regulator
- the Information Commissioner
- the Financial Conduct Authority

The current list of prescribed persons and bodies can be found on the GOV.UK website. CAMRA will periodically review this policy to ensure that regulatory contacts remain current.

Employees and workers who make a qualifying protected disclosure to an appropriate prescribed person or body in accordance with whistleblowing legislation will be afforded the legal protections available under the Public Interest Disclosure Act 1998. This means that no individual will be subjected to dismissal, disciplinary action, victimisation, or any other detriment because they have raised a genuine concern in good faith through the appropriate channels.

Employees do not need to prove that wrongdoing has occurred before making a disclosure. However, they should have a reasonable belief that the information disclosed is

substantially true and that the disclosure is in the public interest. Individuals who are uncertain whether a matter should be disclosed externally are encouraged to seek confidential advice before doing so.

Roles and Responsibilities

Chief Executive
The CEO is responsible for:

- Receiving whistleblowing disclosures;
- Ensuring investigations are undertaken promptly and appropriately;
- Protecting whistleblowers from retaliation;
- Maintaining confidential records of disclosures and outcomes;
- Reporting significant matters to the National Executive where appropriate.

National Executive Chair
Where a disclosure concerns a member of the Senior Staff Team, the concern should normally be reported to the Chair. However, the Chair may appoint an independent investigator or establish an independent panel to investigate the matter where this is considered necessary to ensure impartiality, manage potential conflicts of interest, or maintain confidence in the process.

Where the disclosure concerns the Chief Executive, or where the Chair is implicated in the matter or otherwise has a conflict of interest, the concern should be referred to an alternative designated trustee, committee, or suitably qualified independent external investigator. Oversight of the process should be exercised by individuals with no involvement in the matters under investigation.

The organisation may, at its discretion, appoint independent external advisers to support or oversee the investigation where this is considered appropriate.

All workers, staff and volunteers
All individuals working on behalf of CAMRA have a responsibility to report genuine concerns regarding wrongdoing and to cooperate with investigations where requested.

Legal framework section

Related legislation
This policy has been developed in accordance with:

- Employment Rights Act 1996 (Protected Disclosures provisions)

Whistleblowing Policy

- Public Interest Disclosure Act 1998
- Equality Act 2010
- Employment Rights Act 2025 (effective from 6 April 2026 in relation to sexual harassment disclosures)
- Health and Safety at Work etc. Act 1974
- Data Protection Act 2018 and UK GDPR

CAMRA will review this policy regularly to ensure ongoing compliance with applicable legislation and regulatory guidance.