

Market Deeping Model Railway Club CIO



Whistleblowing Policy

Issue: January 2026

Review: January 202

Registered Charity No. 118777

Contents

1.Purpose	2
2.Scope	2
3.Whistleblowing Policy Guidance	3
3.1 member responsibilities	3
3.2 MDMRC responsibilities	3
3.3 How to report	3
4.Process	3
4.1Investigation	4
4.2 Confidentiality	4
4.3 Protection and support for whistleblowers	4
4.4 Appeals	5
5. Responsibility & review	5
Whistleblowing and Safeguarding Report Form	6

The Whistleblowing policy is for all club members and volunteers who have a serious concern in regard to a breach of our standards of conduct. This policy makes sure that if a member or volunteer has a serious concern, they know how to raise it as soon as possible. The matter will be comprehensively investigated and the appropriate action taken.

It is a commitment of MDMRC to provide a positive environment as we know that all thrive in safe surroundings, so we are committed to making sure that model railway club is enjoyable and safe for everyone involved.

1. Purpose

We recognise our duty of care to all members, volunteers and visitors during all club activities (this includes exhibitions and outreach as well as weekly club meetings). We therefore promote the highest standards of transparency and accountability in everything we do. These standards are set out in our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring unlawful or unethical conduct.

MDMRC aim to foster a culture of openness and accountability as essential in order to prevent such situations occurring and to address them promptly and effectively when they do occur.

Whistleblowing enables genuine wrongdoing to be reported so that something can be done about it. The Whistleblowing Policy applies to all members of MDMRC who have a genuine concern in regard to suspected wrongdoing or malpractice (within the relevant whistleblowing criteria explained below).

This policy ensures that if a member, volunteer or visitor has a genuine concern, they know how to raise it as soon as possible. MDMRC will take seriously any genuine concerns raised, will investigate as appropriate and will take all reasonable steps to ensure the person raising the concern is treated fairly, with dignity and respect.

Any individual who raises genuine concerns reasonably and responsibly will not be penalised in any way, even if they turn out to be mistaken.

2. Scope

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers.

This may include:

- criminal activity;
- danger to health and safety;
- damage to the premises or equipment;
- breach of a legal obligation or regulatory requirement
- bribery;
- financial fraud or mismanagement;
- unauthorised disclosure of confidential information;
- breach of our internal policies and procedures
- conduct likely to damage our reputation or financial wellbeing;
- the deliberate concealment of any of the above.

A whistleblower is a person who raises a genuine concern relating to any to the above whistleblowing criteria in the public interest. If a member has a genuine concern related to suspected wrongdoing, malpractice or danger affecting any of our activities a report should be made under this policy.

Repeating gossip or making allegations dishonestly or maliciously is not considered whistleblowing.

MDMRC can exercise its discretion to use a different policy to deal with your concerns. Our

Whistleblowing Policy sits alongside all other club policies.

If you have concerns about the safety or wellbeing of a young person or adult at risk, you must in the first instance follow the Safeguarding Policy and the matter must be reported to the Safeguarding Team.

3. Whistleblowing Policy Guidance

A member who wishes to raise a concern that fits the whistleblowing criteria above should follow the Whistleblowing Policy.

This includes if the incident is happening now, in the past or may happen in the future. It is important that the concern is raised without delay.

On receipt of a whistleblowing report, our procedures set out in this policy will be put into effect.

3.1 Member responsibilities

We expect all members to:

- Adhere to our code of conduct
- Report all concerns promptly using the correct policies and procedures;
- Never stop or discourage someone from making a disclosure;
- Never criticise or victimise anyone for making a disclosure;
- Not raise concerns with any malicious intent;
- Cooperate with any whistleblowing investigation under this policy, being open and timely in the provision of information.

3.2 MDMRC responsibilities

We will:

- Take concerns seriously;
- Acknowledge receipt of the whistleblowing concern within a period of ten days;
- Consider whistleblowing reports carefully and undertake a thorough and prompt investigation where appropriate;
- Keep you informed as to progress of the investigation if you wish;
- Understand the difficult position a member may be in when raising a whistleblowing concern;
- Seek appropriate advice;
- Take prompt action to resolve the concern or refer it to an appropriate person;
- If the need arises, and if appropriate, report the concern to external agencies;
- Ensure individuals who genuinely report concerns are not penalised in any way;
- Treat any retaliation against or threats to victimisation of whistleblowers as a serious matter that may lead to disciplinary action against the perpetrator.

Misuse of this policy may lead to disciplinary action being taken, including suspension or termination of membership.

3.3 How to report

If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with a Trustee. You may tell them in person or put the matter in writing if you prefer.

They may be able to agree on a way to resolve your concern quickly and effectively. In some cases, they may refer the matter to the Trustees or Committee.

MDMRC encourage young people to speak to a parent, carer or trusted adult if they wish to report a matter through the Whistleblowing Policy so that they can be supported throughout the process.

4. Process

Action on receipt of a concern

Usually within ten working days:

- Once the submission is received it will be acknowledged. A Trustee may contact you (the whistleblower) for clarification and/or make internal enquiries as appropriate.
- The report will be recorded in the Whistleblowing Register.
- Available information will be collected, including any documentation or statements supplied by you (the whistleblower).

We will carry out an initial assessment to consider whether the matter should be investigated and to determine the scope of any such investigation. Reference to the criteria in the Whistleblowing Policy, Charity Commission or other relevant regulatory guidance may be utilised to make this decision.

On occasion, the report may be referred to external agencies/ bodies as appropriate.

A relevant external body or authority may include:

- The Police
- The Charity Commission

Usually within 10 working days, you (the whistleblower) will be provided with the following information:

- The outcome of the initial assessment.
- Confirmation on whether the matter will proceed to investigation and, if so, the name of the investigator.

- If the matter will not be proceeding to investigation, an update regarding what action, if any is being taken and the reasons why.
- Details of the nominated person for contact.
- What action has been taken.
- An indication of the anticipated timeframe to conclude the matter.
- Information about support and protection for the whistleblower.

If it has been determined that the matter will not progress to an investigation and you are not satisfied with this outcome, you can request that the decision be reviewed by the Trustees.

Any such request must be made in writing within 10 days of being notified of the outcome of the initial assessment.

4.1 Investigation

In order to maintain confidentiality and in keeping with our legal obligations, it may not always be possible to give you (the whistleblower) specific details of the investigation or the outcome of any investigation, but you will be informed when the investigation has been completed.

If you raised a genuine concern, we will not take any action against you if the investigator does not uphold the concern.

In all cases, MDMRC will use the Whistleblowing Register to monitor progress and keep track of any investigation and any actions that need to be taken.

The Register will be kept updated stating:

- The name of the whistleblower.
- The date on which MDMRC received the whistleblower's report of a concern.
- The nature of the whistleblowing concern.
- Details of the person who received the whistleblowing report.
- Whether it is to be investigated and by whom.
- The outcome of the investigation.
- What action or change has been implemented as a result of the incident.
- Any recommendations to be considered and by when.

The Register will be confidential to the DSL and within the panel of Trustees.

4.2 Confidentiality

All whistleblowing matters will be treated in confidence. MDMRC will not reveal your identity other than to the DSL and within the panel of Trustees.

We hope that members will feel able to voice whistleblowing concerns openly under this policy.

We do not encourage anonymous disclosures. However, if you have a serious concern, it is better for us to be informed anonymously than not at all. However, to enable a thorough investigation and to be able to substantiate any claims, it is always preferable for you to supply your details.

4.3 Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes concerned about possible repercussions. MDMRC encourages openness and will support members who raise genuine concerns under this policy, even if they turn out to be mistaken and no wrongdoing is found.

If an individual experiences any unfavourable treatment from members of MDMRC, this must be reported to the contact dealing with the investigation immediately.

Members must not threaten or retaliate against whistleblowers in any way.

MDMRC will take all reasonable steps to protect whistleblowers from any negative or unfavourable treatment as a result of their report and support them throughout any investigation. We treat all concerns consistently, fairly and professionally.

4.4 Appeals

We will try to deal with your concerns fairly and in an appropriate way, but we cannot always guarantee the outcome you are seeking.

If at the conclusion of an investigation under this whistleblowing process, you are not satisfied with the outcome you may appeal the decision.

You have grounds for appeal if you believe that the correct process has not been followed or you have new information that you wish to be considered.

In these circumstances, you may appeal to the DSL or Trustees within 30 days of being notified of the outcome. The appeal must be in writing.

The purpose of the appeal is to review the outcome of the original investigation and basis upon which the original decision was made.

5. Responsibility & review

The DSL has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Committee has day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance.

This policy is due for review

- every 24 months, or;
- following any legislative changes, or;
- as required by the Charity Commission.

The policy will be reviewed every two years by the DSL and Trustees.



Safeguarding/Other concern

(delete one)

Reference no: _____

Cause for Concern Form

Name of person reporting	
Date of concern	
Details of the concern	
Name of the person receiving the concern	
Name of the person investigating	
Details of the outcome	
Feedback given	

