North Midlands LGBT+ Older Peoples Group
Registered Charity 1186844
Web: olgbtstoke.org.uk
Email: olgbt2009@gmail.com

Whistleblowing Policy Updated Aug 2026

1. Policy Aim

North Midlands LGBT+ Older Peoples Group (referred to in this policy as OLGBT+ or the Group) is committed to operating honestly, lawfully and in the public interest. Anyone who becomes aware of serious wrongdoing connected with the Group is encouraged to report their concerns. This policy explains how concerns can be raised and how they will be handled.

2. Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters in the public interest.

The protection of whistleblowers in UK law applies to employees but does not currently apply to unpaid volunteers or others. The North Midlands LGBT+ Older Peoples Group is committed to the fair treatment of all whistleblowers including those who may be members, trustees, volunteers or others connected to our organisation.

3. What is Whistleblowing?

Whistleblowing is when someone raises a concern about a dangerous or illegal activity or other wrongdoing within their organisation. It is concerned with matters that affect the charity, its beneficiaries or the wider public, rather than personal disagreements or complaints.

Concerns may relate to trustees, members, volunteers or anyone acting on behalf of the Group.

Concerns relating solely to the declaration or management of conflicts of interest should normally be dealt with under the Group's Conflict of Interest Policy unless they also involve suspected fraud, dishonesty or other serious wrongdoing.

Whistleblowing concerns may include:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment

- bribery, fraud, falsification of financial records
- unauthorised disclosure of confidential information
- a breach of any other legal obligation or regulatory requirement
- the deliberate concealment of any of the above

A whistleblower is a person who raises a genuine concern relating to any of the above acts and has a reasonable belief that it is being, has been or is likely to be committed. A whistleblowing disclosure is made in the public interest

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 – it is the charity's responsibility to ensure that an investigation takes place.

Whistleblowing concerns are raised in the public interest, and not necessarily because of something that has directly impacted on you personally. If your concern falls outside the scope of the matters listed above and relates to something that has affected you or someone known to you, please use the Complaints Policy.

4. Principles

- Concerns will be taken seriously, investigated fairly and appropriate action taken.
- Nobody will suffer disadvantage for raising a genuine concern;
- Malicious and deliberately false allegations may lead to the removal of the person from further involvement in the charity.
- An instruction to cover up wrongdoing is itself a matter of concern, report this to the Chair of the Board of Trustees.

5. Procedure

In the first instance, any concerns should be raised with the Chair of the Board. The Chair will arrange an appropriate investigation, which may involve speaking to those concerned and gathering relevant information.

If an investigation concludes that misconduct has occurred, the Board may remove anyone found responsible from further involvement in our charity. Where appropriate regulatory authorities and the police may also be informed.

On conclusion of any investigation, you will be told the outcome and what the charity has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained. If you are unhappy with the outcome, you can ask the Board to reconsider their decision.

If you reasonably believe that appropriate action has not been taken, you should report the matter to the relevant body. This includes:

- Charity Commission
- Police

- Local Authority
- HMRC
- Information Commissioner's Office

or any other appropriate regulatory authority.

6. Concerns About Trustees

Concerns about an individual trustee should normally be raised with the Chair or, if the Chair is involved, another trustee. Any trustee who is the subject of a concern will take no part in considering or investigating the matter.

Where a concern relates to the conduct of the Board of Trustees collectively, or where there is no realistic prospect of an independent internal investigation, the matter may be reported directly to the appropriate external regulator or authority, such as the Charity Commission or the police where appropriate.

7. Information Governance

When an individual makes a disclosure, we will process any personal data collected in accordance with our Information Governance Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Please help us ensure that our organisation operates safely and lawfully by reporting any concerns that you have.

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Version History

25/10/2023	New policy approved by the OLGBT+ Board of Trustees
04/08/2026	Reviewed and updated to improve clarity and reflect the operation of a small volunteer-run charity.