



Somerset Armed Forces Day CIC  
Company number 13516007

## **Whistleblowing Policy (Public Interest Disclosure Policy)**

Version 2026.Final  
Agreed by the executive committee February 2026  
Review Cycle: Annual

## **1. Purpose**

- a. Somerset Armed Forces Day CIC is committed to operating with integrity, transparency and accountability.
- b. This Whistleblowing Policy provides a safe and confidential way for individuals to raise concerns about wrongdoing, misconduct or risks within the organisation without fear of retaliation.
- c. This policy supports compliance with the Public Interest Disclosure Act 1998 (PIDA) and reflects our commitment to good governance.

## **2. Scope**

- a. This policy applies to:
  - i. Directors
  - ii. Staff (if employed)
  - iii. Volunteers
  - iv. Contractors
  - v. Suppliers
  - vi. Event partners
  - vii. Anyone working on behalf of Somerset Armed Forces Day CIC

## **3. What Is Whistleblowing?**

- a. Whistleblowing is the disclosure of information relating to suspected wrongdoing in the public interest.
- b. Concerns may include:
  - i. Criminal offences
  - ii. Fraud or financial mismanagement
  - iii. Bribery or corruption
  - iv. Safeguarding failures
  - v. Health and safety risks
  - vi. Misuse of funds
  - vii. Breach of legal obligations
  - viii. Serious reputational risk
  - ix. Deliberate concealment of wrongdoing
- c. Whistleblowing is different from a personal grievance or complaint.

## **4. Our Commitment**

- a. Somerset Armed Forces Day CIC will:
  - i. Treat concerns seriously
  - ii. Investigate matters fairly and impartially
  - iii. Protect whistleblowers from victimisation or detriment
  - iv. Maintain confidentiality wherever possible
  - v. Act on findings appropriately
- b. No individual will suffer disadvantage for raising a genuine concern in good faith.

## **5. How to Raise a Concern**

- a. Concerns should be raised as soon as possible.
- b. Internal Reporting
  - i. In the first instance, concerns should be reported to:
  - ii. Chair of Directors:
    1. Name: Edward Cullen
    2. Email: [chairman@somersetarmedforcesday.com](mailto:chairman@somersetarmedforcesday.com)
- c. If the concern relates to the Chair, it should be reported to another Director.
- d. Reports should include:
  - i. Nature of concern
  - ii. Dates and times (if known)
  - iii. Individuals involved
  - iv. Any supporting evidence
- e. Concerns may be raised verbally or in writing.

## **6. Confidentiality**

- a. We will:
  - i. Keep the identity of the whistleblower confidential wherever possible
  - ii. Share information only where necessary for investigation

- iii. Respect requests for anonymity (although this may limit investigation)

## **7. Investigation Process**

- a. Once a concern is raised:
  - i. Acknowledgement will be provided within 5 working days where possible.
  - ii. An appropriate investigating officer will be appointed.
  - iii. Relevant evidence will be gathered.
  - iv. Findings will be reported to the Board (excluding any conflicted parties).
  - v. Appropriate action will be taken.
- b. This may include:
  - i. Disciplinary action
  - ii. Policy review
  - iii. Referral to external authorities
  - iv. Notification to insurers
  - v. Safeguarding referral

## **8. Protection from Detriment**

- a. Somerset Armed Forces Day CIC will not tolerate:
  - i. Victimisation
  - ii. Harassment
  - iii. Dismissal
  - iv. Unfair treatment
- b. of anyone raising a genuine concern.
- c. Any retaliation will be treated as a serious disciplinary matter.

## **9. False or Malicious Allegations**

- a. If a concern is raised in good faith but not substantiated, no action will be taken against the whistleblower.
- b. However, deliberately false or malicious allegations may result in disciplinary action.

## **10. Escalation to External Bodies**

- a. If an individual feels their concern has not been properly addressed internally, they may report concerns to appropriate external authorities such as:
  - i. The Police
  - ii. The Information Commissioner's Office (ICO)
  - iii. The Health and Safety Executive (HSE)
  - iv. The CIC Regulator
  - v. The Charity Commission (where relevant partners are involved)
- b. We encourage individuals to raise concerns internally first wherever possible.

## **11. Record Keeping**

- a. All whistleblowing reports will:
  - i. Be recorded securely
  - ii. Be treated confidentially
  - iii. Be reported to the Board
  - iv. Be reviewed annually to identify patterns or governance risks

## **12. Policy Review**

- a. This policy will be reviewed annually to ensure ongoing compliance with legislation and best practice.

## **13. Commitment Statement**

- a. Somerset Armed Forces Day CIC is committed to maintaining the highest standards of honesty and integrity. We encourage a culture where concerns can be raised safely and responsibly in the public interest.