

WHISTLEBLOWING POLICY

In the first instance, any concerns should be raised with the **General Secretary**, who will arrange an investigation of the matter. Either by emailing gensec@mvt.org.uk or by phoning **0333 321 8977** and select **Option 2**.

How the process works

The Military Vehicle Trust (MVT) takes its responsibilities seriously and continually strives to embed good practice across the organisation and beyond.

It is important that any fraud, misconduct or wrongdoing identified by the MVT officers, trustees, Area Secretaries, members and volunteers and others working with or on behalf of the charity is reported and properly dealt with. We therefore ask all individuals connected with the MVT to raise any concerns that they may have about the conduct of others in the charity, or the way in which our organisation and external partnership organisations are run.

Background and principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing in our charity and its activities. MVT officers, trustees, Area Secretaries, members and volunteers and others working with or on behalf of the charity should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

The MVT is legally obliged to provide protection to those who raise legitimate concerns about specified matters in the public interest. Examples of such concerns are:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation;
- concealment of any of the above.

There is no responsibility for the individual reporting the matter to investigate it - that is the charity's responsibility to ensure that an investigation takes place.

We encourage the reporting person to raise their concerns under this procedure in the first instance. The identity of the reporter will not be disclosed beyond the investigating team and the person will not be subjected to any victimisation because they made a disclosure.

When an individual makes a disclosure, the MVT will process any personal data collected in accordance with the trust's data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by and disclosed to individuals only where necessary for the purposes of dealing with the disclosure.

The outcome of the investigation will be reported back to the person who raised the issue.

If misconduct is discovered as a result of investigation under this procedure the trust's Code of Conduct will be used, in addition to any appropriate external measures. An instruction to cover up wrongdoing is itself an offence so if the individual is told not to raise or pursue a concern, even by a person in authority such as a trustee, the individual reporting the matter must not agree to remain silent the matter must be reported.

Details of the procedure

This procedure is for disclosures about matters concerning the MVT and other external and/or partnership organisations.

Stage 1: In the first instance, any concerns should be raised with the General Secretary, who will arrange an investigation of the matter. The investigation may involve the reporting individual and any others involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Statement will be taken into account, along with any comments on any additional evidence obtained. The General Secretary will take the necessary action, including reporting the matter to any appropriate government department or regulatory agency. The General Secretary will also invoke any corrective action required. On conclusion of any investigation, the reporter 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.

Stage 2: If there is a concern that the General Secretary 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, the reporting individual should escalate the matter to the Chairman of the trust. The Chairman will arrange for a review of the investigation to be carried out and make any necessary enquiries.

Stage 3: If on conclusion of Stages 1 and 2 the reporting individual reasonably believes that the appropriate action has not been taken, they should report the matter to the relevant body. This includes:

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commission
- The Financial Conduct Authority
- Companies House.

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

How to Make a Disclosure

As mentioned above, any concerns should be raised with the General Secretary by calling **0333 321 8977** and selecting **Option 2** to leave a message or by emailing gensec@mvt.org.uk or you can write directly to:

Military Vehicle Trust
Shorrock House
1 Faraday Drive
Fulwood
Preston PR2 9NB

To escalate the matter, please contact the Chairman of the trust by email to chairman@mvt.org.uk