

RAISING CONCERNS – “WHISTLEBLOWING POLICY”

This policy applies to all club players and staff and directors and advisors, together known as “Employees”.

It is important to the club that any fraud, misconduct or wrongdoing by Employees or officers of the club is reported and properly dealt with. The club therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the club / business or the way in which the club/ business 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.

QUALIFYING DISCLOSURE

The law provides protection for Employees and others who raise legitimate concerns about specified matters.

For the purposes of this policy reference to “employees” covers all staff including players. These are called “qualifying disclosures”. A qualifying disclosure is one made in the public interest by an employee who has a reasonable belief that:

- a. A criminal offence
- b. A miscarriage of justice
- c. An act creating risk to health and safety
- d. An act causing damage to the club
- e. Damaged breach of any other legal obligation; or
- f. Concealment of any of the above

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

An Employee who makes such a protected disclosure has the right not to be dismissed in the first instance.

If an Employee or someone else is not sure whether or not to raise a concern, he/she should discuss the issue with his/her Line Manager, Academy Manager, Designated Safeguarding Officer, the Chief Executive or other director of the Holding Board. They will report it and the club will follow this policy.

PRINCIPLES

- a. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- b. Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the Employee who raised the issue.

- c. No Employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the Employee will not be prejudiced because he/she has raised a legitimate concern.
- d. Victimisation of an Employee for raising a qualified disclosure will be a disciplinary offence.
- e. If misconduct is discovered as a result of any investigation under this procedure the club's disciplinary procedure will be used, in addition to any appropriate external measures.
- f. Maliciously making a false allegation is a disciplinary offence.
- g. 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 such as a coach, manager, or Employee, you should not agree to remain silent, they should report the matter to the chief executive.

PROCEDURE

This procedure is for disclosures about matters other than a breach of an Employee's own contract of employment. If an Employee is concerned that his/her own contract has been, or is likely to be, broken, he/she should use the club's grievance procedure.

The club is committed to address any issues of malpractice and positively encourages Employees to use the available channels to raise any concerns they may have.

Employees should raise a complaint in writing to their line manager.

The line manager (or the person who carried out the investigation) will then report to the CEO, who will meet with you to discuss your concern and gather and appropriate evidence. Your complaint will then be investigated in full and, on conclusion of the investigation, take any necessary action, including reporting the matter to any appropriate government department or regulatory agency.

If disciplinary action is required against any Employee of the Club, the line manager (or the person who carried out the investigation) will report the matter to the chief executive who will start the disciplinary procedure.

On conclusion of any investigation, you will be told the outcome of the investigation and what the chief executive has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

If the Employee is concerned that his/her coach/line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the board, he/she should inform the Designated Safeguarding Officer, David Wilkes, contact telephone number 07940 483 680, who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make his/her own report to the CEO.

If for any other reason the Employee does not wish to approach his/her line manager he/she should also in the first instance contact the Chief Executive Officer – as above. Any approach

to the Chief Executive Officer will be treated with the strictest confidence and the Employee's identity will not be disclosed without his/her prior consent.

If the matter concerns the CEO it should be directed to the DSO who will inform the Chairman and a Holdings Board director will deal with the complaint and report to the Holdings Board.

Any Employee with concerns about any conduct towards a child or young person can use whistle-blowing procedures by calling 0800 169 1863 and asking for The FA's safeguarding team, or via email to: safeguarding@TheFA.com

Alternatively, concerns can be reported to:

- Direct to the local Police or Children's Social Care services, or
- The Child Protection in Sport Unit at cpsu@nspcc.org.uk, or
- The NSPCC Helpline on 0808 800 5000 or email: help@nspcc.org.uk

The club follows the guidance in relation to the positions of trust as detailed in the Sexual Offences Act 2003.

If you have any questions with regards to this policy please contact the Chief Executive Officer or the Designated Safeguarding Officer.