Whistleblowing Policy

What is Whistleblowing?

In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, safeguarding allegations, illegal acts or failure to act within the club. The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the club's work to come forward and voice those concerns. Employees are often the first to realise that there may be something seriously wrong within the club. 'Whistleblowing' is viewed by the club as a positive act that can make a valuable contribution to the clubs efficiency and long-term success. It is not disloyal to the The Club to speak up. The Club is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its practices.

To help achieve these standards it encourages freedom of speech.If you are considering raising a concern you should read this Policy first. It explains:

- The type of issues that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern
- What the club will do/ how the matter may be resolved.

What is the aim of the Policy and when does it apply?

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the club without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable you to raise serious concerns within the club rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- Provide avenues for you to raise those concerns and receive feedback on any action taken
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

Scope of this Policy

This Policy is intended to enable those who become aware of wrongdoing in the club affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated and resolved. The Whistle Blowing Policy is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures
- If a client has a concern about the services provided to him/her, it should be raised as a complaint to the club

Who can raise a concern under this Policy?
The Policy applies to all:
• Employees and volunteers of the club including the Board of Trustees.
• Those providing services under a contract or other agreement with the club

What should be reported?
Any serious concerns that you have about service provision or the conduct of officers or members of the club or others acting on behalf of the club that:
• Make you feel uncomfortable in terms of known standards;
• Are not in keeping with the club Constitution and policies;
• Fall below established standards of practice; or
• Are improper behaviour.

These might relate to:
• Conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
• Disclosures related to miscarriages of justice
• Racial, sexual, disability or other discrimination
• Health and safety of the public and/or other employees
• Damage to the environment
• Unauthorised use of public funds or other assets
• Possible fraud and corruption
• Neglect or abuse of clients, or
• Other unethical conduct.
• A Safeguarding concern

This list is not exhaustive.

Protecting the Whistleblower (Your legal rights)
This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest. The Act makes it unlawful for the club to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act. Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. The Club cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

Harassment or Victimisation
The Club is committed to good practice and high standards and to being supportive of you as an employee. The Club recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service. The Club will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary procedure if relating to a staff member.

Support to you throughout this process:
• You will be given full support from senior management.
• Your concerns will be taken seriously, and
• The Club will do all it can to help you throughout the investigation

Confidentiality
All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

Anonymous Allegations
This policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously. Concerns expressed anonymously are much less powerful but they may be considered at the discretion of the club. In exercising this discretion the factors to be taken into account would include:
• The seriousness of the issue raised
• The credibility of the concern, and
• The likelihood of confirming the allegation from other sources

Untrue Allegations
If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the The Club will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action (staff only), may be taken.

Who should you raise your concern with?
This will depend on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing. You should normally raise concerns with:
• Your line manager or a member of the senior leadership team
• Should the concern relate to a safeguarding concern you should contact the Designated Safeguarding Officer.
• Should the concern be regarding the Club Welfare Officer you should contact the Club Chairman.
• Should the concern be about the club Chairman your concern should be raised with the Club President who will decide how the investigation will proceed. This may include external investigation.

How to raise a concern
You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:
• The nature of your concern and why you believe it to be true
• The background and history of the concern (giving relevant dates) Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within the club and there are reasonable grounds for your concern.

You may wish to consider discussing your concerns with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

What the club will do
The Club will respond to your concerns as quickly as possible. Do not forget that testing your concerns is not the same as either accepting or rejecting them. The overriding principle for the club will be the safety of the participants. In order to be fair to all, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The investigation may need to be carried out under the terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:
- Be investigated by management, internal audit, or through the disciplinary/grievance process
- Be referred to the police
- Be referred to the Norfolk FA or the FA
- Be referred and put through established child protection/abuse procedures
- Form the subject of an independent inquiry

What to do if you are not happy with the outcome?
If following an investigation you do not feel the internal procedures met your expectations there is an opportunity to raise a concern externally by contacting one of the FA Safeguarding.