

# Whistleblowing Policy

Updated 9<sup>th</sup> February 2017



A whistleblower as defined by this policy is an employee of Stevenage Football Club (SFC) who reports an activity that he/she considers to be illegal, dishonest, and or of a Safeguarding nature to one or more of the parties specified in this Policy.

The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate senior management personnel are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of the law; billing for services not performed or for goods not delivered and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor, department manager or the General Manager.

The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

Stevenage Football Club will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm.

Any whistleblower who believes he/she is being retaliated against must contact the General Manager immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the General Manager who is responsible for investigating and coordinating corrective action. Employees with any questions regarding this policy should contact the General Manager.

## **Whistleblowing – Safeguarding & Welfare**

### **Purpose**

This section of the policy will set out how individuals can raise concerns about the safety and welfare of children, young people and vulnerable adults involved in Stevenage Football Club.

It will provide a method of raising concerns and how they can receive feedback on any action taken. SFC will ensure individuals will:

- Receive a response to their concerns.
- Be made aware of how to pursue the concern further if they are not satisfied with the response.
- Be re-assured that individuals will be protected from reprisals or victimisation for whistle blowing in good faith.

### **Scope**

Everyone involved in activity carried out under the jurisdiction of SFC are covered by this policy.

## **Policy Statement**

Staff are often the first to realise that a child's safety and welfare are under threat. However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation.

In these circumstances, it may be easier for them to ignore the concern rather than report what may just be a suspicion of poor practice. SFC would urge anyone to come forward and voice those concerns.

This policy details how individuals can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable individuals to raise serious concerns within SFC rather than overlooking a problem or blowing the whistle outside.

It is in the interest of all concerned that disclosure of potential abuse or irregularities are dealt with properly, quickly and discreetly.

## **Safeguarding**

SFC realise that raising a concern and reporting allegations are often difficult to make through fear of reprisals from those responsible for the alleged poor practice. If the individual believes what they say to be true and are not deemed to be malicious, SFC will fully support the whistleblower and will not tolerate any bullying, harassment or victimisation whatsoever. If this does occur, any perpetrators will be dealt with under SFC disciplinary policy/procedure resulting in possible expulsion from the club.

## **Confidentiality**

SFC will do its utmost to keep confidential the identity of a whistleblower. Should any allegations be made through whistleblowing it should be noted that a statement may be needed to form part of the evidence.

Should the whistleblower need to be identified or it becomes apparent that the whistleblower will be identified because of any subsequent investigation, notice will be given to the whistleblower, by the SFC Designated Safeguarding Officer (DSO) to which persons the identity disclosure will be made, with a chance to discuss any likely consequences.

## **Raising a Concern or Making an Allegation**

Anyone wishing to raise a concern should do so either verbally or in writing to the DSO.

Designated Safeguarding Officer – Bob Makin (General Manager and Football Secretary), [bobm@stevenagefc.com](mailto:bobm@stevenagefc.com) / 01438 223223

The concern needs to be as specific as possible including any names, dates and locations where possible.

The burden of proof does not lie with the whistleblower.

Should any concerns or allegations be made, SFC would encourage the whistleblower to put their name to the allegation. Any concerns or allegations that are anonymous are much less powerful and are therefore much harder to prove. Should SFC receive any anonymous allegations these, of course, will be investigated.

If, after the course of an investigation, it has been found that the concerns or allegations are untrue or have not been substantiated then no action will be taken against the whistleblower.

Any whistleblower who believes he/she is being retaliated against must contact the General immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All investigations will be undertaken by the DSO who may be supported by an appropriate member of the Senior Management Team.