



Reporting Concerns and Whistleblowing Policy

Purpose

This policy will set out how individuals can raise concerns particularly about the safety and welfare of children, young people and vulnerable adults involved at Chesterfield FC and the Community Trust. There may also be issues around equality or discrimination matters that raise concerns. However the principles also cover all other aspects of malpractice by individuals, within the Club, projects or as part of the Trust's practices.

It will provide a method of raising concerns and how they can receive feedback on any action taken. The Club 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 whistleblowing in good faith.

Scope

Everyone involved in activity carried out under the jurisdiction of Chesterfield FC or the Community Trust is covered by this policy.

Policy Statement

Workers and volunteers are often the first to realise that there may be evidence of malpractice within the Club or Trust. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Club or Trust. They may also fear harassment or victimisation.

In line with the Chesterfield FC's commitment to high standards of openness, integrity and accountability, the Club expects anyone who has a reasonable belief that malpractice is taking place within the Club to come forward and voice those concerns internally. This may be an awareness of suspected irregularity, wrongdoing or failure of standards. This code provides the means for employees, partners, volunteers, participants and fans to make such disclosures.

Often it may be easier for people to ignore the concern rather than report what may just be a suspicion of poor practice. The Club 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 the Club 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

Employees, coaches, volunteers, parents or other participants 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. There may be similar concerns when it comes to threats to vulnerable adults.

The Club realises 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 then the Trust 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 the Club's disciplinary procedures resulting in possible expulsion from the wider Club.

In reading this policy it should be noted that the John Croot is the Senior Safeguarding Officer. While the policy speaks of line managers in terms of safeguarding consider that to mean the Designated Safeguarding Officer for the particular department.

Equality, Inclusion and Anti-Discrimination

Chesterfield FC is committed to the promotion of equality within the Club, the Trust, and affiliated organisations, through the way we manage the club and provide services to fans, customers, partners and the community. In order to express this commitment, we develop, promote and maintain policies that will be conducive to the principles of fairness and equality.

We welcome examples of how we can make the Proact Stadium, The HUB and all our services more accessible and inclusive.

Our Equality Champion is Stephen Kerry and can be contacted in the first instance.

Raising a Concern or Making an Allegation

This policy provides you with a procedure for making disclosures internally about suspected wrongdoing, irregularity or failure of standards within the Club. Its aims are:

- to encourage you to feel confident in raising serious concerns and to question and act upon concerns about possible malpractice within the Trust.
- to provide a means for you to disclose those concerns and receive feedback on any action taken.

- to ensure that you receive a response to your concerns and that you are aware of how to pursue them further if you are not satisfied.
- to reassure you that you will be protected from possible reprisals or victimisation and from subsequent discrimination or disadvantage.

Any serious concerns that you have about an aspect of service provision or conduct of coaches, employees, volunteers, directors or trustees of the Club or Trust or others acting on behalf of the wider club can be reported under this code. This may be about something that:

- makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Club subscribes to.
- is against the Club's policies.
- falls below established standards of practice.
- amounts to improper conduct.

Confidentiality

All disclosures will be treated in confidence and wherever possible, every effort will be made not to reveal your identity. However, you may need to come forward as a witness and you will be given every support from management at that time.

Anonymous Disclosure

You should put your name to your disclosure whenever possible. Disclosures made anonymously will still be considered at the discretion of the Trust. However, it is helpful to have your name in case further information is required.

In exercising its discretion, the Club will take into account:

- the seriousness of the issues raised.
- the credibility of the disclosure.
- the likelihood of confirming what is alleged from attributable sources.

Untrue Disclosures

If you make a disclosure in good faith, but it is not confirmed by the investigation, no action will be taken against you. If however, your allegation is frivolous, malicious or for personal gain, you may be subject to disciplinary action.

Employee Action

As a first step, you should normally raise your concerns with your line manager. If you believe your line manager is involved, you should approach a director or the Chief Executive Officer. This depends however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If you believe that

your line manager and a director or senior officer are involved, you should approach the Chairman of the Club or Chair of Trustees.

You may raise your concern either verbally or in writing. The earlier you express the concern, the easier it is to take action. You should provide:

- details of your concerns, including the nature, dates and location of any relevant incidents.
- reasons why you feel concerned about the situation.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

You may wish to consider discussing your concern 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.

You may invite a representative to be present during any meetings or interviews in connection with the concerns you have raised.

The amount of contact between you and the person considering the issues will depend on the nature of the matter raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Trust will seek further information from you.

Action Taken by the Club

The Club or Trust will respond to your disclosure. Where appropriate, the matters raised may be:

- a) investigated by management, by internal audit, or through the disciplinary process;
- b) referred to the police;
- c) referred to the external auditor;
- d) the subject of an independent inquiry.

In order to protect individuals and those accused of possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The over-riding principle the Club will have in mind is the public interest. The disclosures for which there are other specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any action investigation is conducted.

Within 10 working days of a concern being raised, you will receive a response:

- a) acknowledging that the concern has been received;
- b) telling you whether any initial enquiries have been made;
- c) indicating how the matter is going to be dealt with;
- d) giving an estimate of how long it will take to provide a final response;
- e) supplying you with information on staff support mechanisms;
- f) telling you why if there is to be no further investigation.

The Club will take steps to minimise any difficulties you may experience as a result of making a disclosure. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Trust will arrange for you to receive advice about the procedure.

You will need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will be informed of the outcomes of any investigation.

How the Matter Can Be Taken Further

This code is intended to provide you with a route within the Club to make disclosures of malpractice. The Club hopes you will be satisfied with any action taken. If you are not, and you believe the information you have disclosed is substantially true, possible contact points are:

- Public Concern At Work
- The external auditor
- Your trade union
- Your local Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- A relevant voluntary organisation
- The Police

If you do take the matter outside the Club, you should ensure that you do not disclose confidential information. Check with the person dealing with your disclosure within the Trust before divulging any information.

All investigations concerning safeguarding will be undertaken by the SSO who may be supported by an appropriate member of the Management Team. However, should you feel that you have not received a satisfactory response to your concern you can approach the following people/organisations:

- Cath Morton - County Welfare Officer- 01332 361422
- FA/ NSPCC 24-Hour Help-line - 0808 800 5000 alternatively you can text on 88858
- Derbyshire Safeguarding Children Board - 01629 532169

- Derbyshire Police - 101
- Ann Hussey, EFL Child Protection Advisor, ahussey@football-league.co.uk
01772 325811

For issues around Equality, Sally Swain or John Croot will investigate any issues that are raised. Should you wish to raise an issue away from the Club then the Equality Advisory & Support Service (EASS) offers a free National Helpline - Advice and Support for incidents of discrimination and human rights. 0808 800 0082

For wider issues with malpractice any investigation will be by the Chairman or Chair of Trustees or a relevant Board member. Again you can raise concerns externally through these organisations:

- The Football League- enquiries@efl.com
- The EFL Trust- info@efltrust.com 01772 325954
- The Charity Commission-
<https://www.gov.uk/government/organisations/charity-commission>
- The Citizens Advice Bureau- 01246 209164
- Derbyshire Police- 101

Reviewed 25 April 2017