



Football Family Ltd: Whistle Blowing Policy

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Positional Statement and Scope

Football Family has taken every effort to ensure the transparency of all Policies and procedures and to make all channels and forms of communication, including whistleblowing, accessible and clear. This Policy has been designed to enable and encourage all staff, visitors, and volunteers to raise internal concerns or complaints, and to ensure that these concerns and complaints are met with openness and accountability of the highest level.

In any such cases where an individual suspects malpractice or wrongdoing, the individual is actively encouraged to disclose the information internally without fear of prejudice, judgement, or reprisal.

Definition of Terms

Whistleblowing is a blanket term used to describe the actions of an individual or collective who raise concerns or complains about malpractice, illegality, danger, or general wrongdoing that affects others in their organisation or affiliated group. The 'whistle-blower' will not usually be directedly affected by the consequences of such malpractice, illegality, danger, or wrongdoing and as such will not have personal / bias interest in the outcome of any following investigations.

It is important to note that if you a person wishes to make a complaint or grievance on their own behalf, for matters that directly affect them, then they should be directed or redirected to the Football Family

Complaints and Appeals Procedure 2019.

There are many examples of potential malpractice, illegality, danger, and general wrongdoing but for ease of reference, we have included the following:

- Direct breach of GDPR regulations and protection of data
- Physical, emotional, or sexual abuse of learners, visitors or fellow staff members
- Fraud / corruption
- Finance Maladministration / Unauthorised use of company finances
- Endangering the health, safety, wellbeing, or life of an individual
- Deliberate failure to follow contractual obligations

Procedures

In most cases, the Whistle-blower should report any initial concerns to their immediate line manager. However, in cases where this is not appropriate either because the line manager is suspected of malpractice, illegality, danger or wrongdoing or because they are not physically available (because they are on leave, for example), then the initial concern should be taken to the Director of Education or the Owners of Football Family.

The allocated investigating officer should follow the following guidelines:

- Obtain clarification and details of the complaint – a written statement is preferred
- Inform the staff member, volunteer, or visitor (who the allegation is being made against) as soon as possible and inform them of their rights and expectations
- They may have a colleague or trade union representative present at meetings and investigative hearings
- In severe cases whereby the allegation relates to misuse of company data or finances, or the safety of another individual is questioned, the individual may be suspended from duties
- The Director of Education must be informed as soon as possible
- The investigating officer and the Director of Education will determine if the involvement of internal auditors or external organisation such as the police or social services need to be informed and involved
- Allegations and concerns must be fully investigated and documented
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the outcome.
- If appropriate, a copy of the outcomes will be used to enable a review of Company procedures.

This Policy and its associated procedures are designed to protect the staff, volunteers and visitors of Football Family who disclose their concerns and consequently 'blow the whistle' on acts of malpractice, illegality, danger, or wrongdoing. This is assuming that all disclosures are made in good faith and believed to be true.

Support for complainants

Whilst internal support is provided, all staff, volunteers and visitors are encouraged to seek external advice and support from their chosen professional association, advisor, or trade union before disclosing their concerns, for their own peace of mind. All staff, volunteers and visitors are also encouraged to familiarise themselves with the charity PCAW (Public Concern at Work). The PCAW offer practical, legal, and impartial advice to individuals with whistle blowing dilemmas at work and support organisations with their whistleblowing arrangements.

Please see the PCAW contact details below:

- Telephone: 027 404 6609
- Email: whistle@pcaw.co.uk

Anyone who feels that they have been victimised as a result of whistleblowing should make a complaint, following the guidelines set out in the Football Family **Complaints and Appeals Procedure 2019**.

Confidentiality

It is very important to treat conversations and correspondence with full discretion. It is vital that whistle-blowers feel confident that their concern will not lead to them being victimised or penalised in any way. However, all whistle-blowers should be made aware that some information may have to be shared with others involved in the operation of the **Complaints and Appeals Procedure 2019**. This relates to instances whereby 'anonymous' whilst blowing concerns are raised or in instances where the concerns relate to the health and safety or emotional wellbeing of an individual or group.

In such cases as outlined above, particularly if external, regulating, or legal organisations are involved, the investigation may be required to reveal the source of the information and initial concern. In more serious cases, the whistle-blower may be required to provide a statement as evidentiary support for the investigation.

Anonymous Allegations

Football Family recognises that individuals may lack the confidence to come forward or may fear victimisation or reprisal as a result of whistleblowing. However, as outlined above there are instances where maintaining anonymity is not possible. Football Family encourages all whistle-blowers to provide their details (including name and contact information) when raising concerns. Anonymous concerns are considered much less credible and can be more difficult to investigate.

Untrue Allegations

If a concern is raised in good faith but the investigative process cannot confirm the allegation, then no action will be taken against the individual. However, in instances where concerns are raised maliciously or proven to be untrue, disciplinary action or termination of contracts may occur. In more severe cases, legal action may be taken against the individual.

External Contacts

The Football Family recognise that in some instances, as a last resort, it may be appropriate to raise concerns outside of the company, to the relevant regulating body. To make this procedure as easy and transparent as possible, names and contact details of specific regulating bodies have been provided below.

- **Ofsted (whistleblowing helpline):** 0300 123 3155
- **National Audit Office:** 020 7798 7999
- **Information Commissioner:** 0303 123 1113
- **Environment Agency:** 03708 506 506
- **Health and Safety Executive:** 0300 0031 647

Policy Reviews

This Policy will be renewed annually.

For further information or to discuss any concerns regarding this, or any of our other Policies and Procedures, please contact: info@footballfamily.org.uk