

Plymouth Argyle Football Club



Whistle Blowing Policy

Purpose of this Policy

Plymouth Argyle Football Club is committed to conducting our business with honesty and integrity and we expect all Staff and volunteers to maintain the same high standards. It is always possible, however, for things to go wrong or for organisations to unknowingly harbour illegal or unethical conduct.

The Club is committed to developing a culture where it is safe and acceptable for everyone involved in Club activities to raise concerns about any unacceptable practice, behaviour, wrongdoing or misconduct. This includes, but is not limited to, offences under the Sexual Offences Act 2003, Protection of Children Act 1978 s1, and Equality Act 2010 s.26.

Recognising that, through loyalty or fear of repercussion, people may be reluctant to voice worries, this policy has been created to encourage members of the game to speak up, knowing that they will be supported and their concerns will be handled sensitively.

Speaking up will enable safeguarding concerns to be investigated and dealt with for the benefit of all involved and for that of the wider game. Anyone making a disclosure can be confident that the matter will be handled appropriately and with an appropriate level of confidentiality.

Overview

- This policy outlines what you should do if you suspect something happening at work is putting you or others in danger, or is illegal or unethical.
- This policy applies to all employees, contractors, consultants, players, volunteers, casual and agency workers.
- If you are an employee, this policy does not form part of your contract of employment.

Scope

Everyone involved in activity carried out under the jurisdiction of Plymouth Argyle Football Club is covered by this policy.

Policy Statement

Players, coaches, other employees, volunteers, officials, parents and/or team followers are often the first to recognise concerns which potentially compromise the welfare or safety of those engaged in our activities of any age and those employed by the Club including players and apprentices.

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. Plymouth Argyle Football Club would urge anyone to come

forward and voice those concerns. If you have safeguarding or welfare concerns, doing nothing is never an option.

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 Plymouth Argyle Football Club rather than overlooking a problem or blowing the whistle outside.

It is in the interests of all concerned that disclosures of potential abuse or concerns are responded to and managed appropriately and without delay.

Safeguarding

Plymouth Argyle Football Club realise that raising a concern and reporting allegations is often difficult to do through fear of reprisals from those responsible for the alleged poor practice. This policy is designed to offer protection to anyone who raises a concern provided the disclosure is made:

- In good faith;
- If the individual believes what they say to be true, and are not intending / attempting to be malicious, even if the concerns subsequently are proven unfounded.

In these circumstances, Plymouth Argyle Football Club will fully support the whistle-blower and will not tolerate any bullying, harassment or victimisation whatsoever. If this does occur any perpetrators will be dealt with under Plymouth Argyle Football Club's disciplinary policy and procedures (and as a result may face expulsion from the Club).

Confidentiality

Plymouth Argyle Football Club will do its utmost best to keep confidential the identity of a whistleblower. Should any allegations be made through whistle-blowing it should be noted that a statement may be needed to form part of the evidence.

Should the whistle-blower need to be identified for any reason or it becomes apparent that the whistle-blower will be identified because of any subsequent investigation, notice will be given to the whistle-blower, by a representative of Plymouth Argyle Football Club (usually the Club's Designated Safeguarding Officer) so that an opportunity is provided to discuss any likely consequences and support required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible and more difficult to investigate effectively, but they may be considered at the discretion of the Club. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised and any potential safeguarding risks indicated
- The credibility of the concern
- The likelihood of confirming or clarifying the allegation from attributable sources
- Statutory agency advice e.g. LADO, Children's Social Care or the Police

If anybody feels unable to disclose their identity this policy seeks to encourage them to report any safeguarding concern in good faith and through external agencies such as the NSPCC Helpline (0808

800 5000) if necessary. Contact details for local statutory agencies and the Local Authority Designated Officer (LADO) are set out in the Club's Safeguarding and Child Protection Policy.

The NSPCC Helpline for Whistleblowing can be contacted for support and advice by telephone (T: 0800 028 0285) or email (help@nspcc.org.uk)

What is whistleblowing?

- Our aim is to maintain the highest standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Should you have any such concerns, we encourage you to report them immediately — this is called 'whistleblowing'. You can be assured that we will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.

The types of concerns you may want to raise with us by whistleblowing might include:

- any activity you suspect is criminal;
- any activity you suspect puts health and safety at risk;
- any activity you suspect may damage the environment;
- any activity you suspect breaches our policy on bribery and corruption;
- any failure to comply with legal or regulatory obligations;
- any failure to meet professional requirements; and/or
- any attempt to conceal one or more of these activities.

Speak to your manager if you are not sure whether something you have become aware of is covered by this policy. Note that if your complaint is about the way people are behaving towards you, then you should refer to our policy on Appropriate Behaviour, or to our Grievance Policy, for guidance on how to proceed. There may also be circumstances where you need to refer to the Safeguarding Policy.

How to raise a whistleblowing concern

- In most cases, you should start by raising your concerns with your manager, either face-to-face or in writing.
- If you would prefer not to go to your manager, you should write to the CEO or Head of HR. You should also do this if your concerns are of a very serious nature.
- Your letter should say that you are raising your concerns under this policy and then explain what they are. Include all the key facts, dates, and the names of the people involved.
- You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.
- After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.
- You will be kept informed about how our investigations are progressing and how long they are likely to take. Sometimes, however, we may be unable to give you details about the

investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations. We understand this may be frustrating and give you concerns about whether we have actually done anything, and if this happens we will do our best to sit down with you and explain why we are acting in the way we are.

- Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to one of our board directors for further consideration.
- Most concerns are raised with us in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our Disciplinary Policy and is at risk of being dismissed for gross misconduct.

Confidentiality and anonymity

- There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing.
- You are always encouraged to raise concerns openly, and if you prefer to do so in confidence, we will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation, but will always discuss this with you first.
- You are protected from reprisals under this policy (see paragraph 5), but if you are still worried we encourage you to discuss this with us and we will explore how far we can go in keeping your concerns confidential.
- Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't properly establish whether your allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymous.

How we protect whistleblowers

- If you raise a concern in good faith under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation etc. However, if you feel you have been treated detrimentally as a result of raising a concern, you must tell us at once. First inform your manager and, if the matter remains unresolved, you must follow the formal process in our Grievance Policy.
- All whistleblowers are afforded the same protection, so you must not threaten others who have raised concerns or carry out reprisals against them. You may face disciplinary action which could include dismissal for gross misconduct, if we find that you have. You may also face legal action from the whistleblower in these circumstances.
- You can seek further advice on whistleblowing, protecting confidentiality, and being protected from reprisals from the independent charity Public Concern at Work, which offers a confidential helpline on 020 7404 6609; www.pcaw.org.uk.

Taking your concerns outside the Club

- This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside the Company to become involved when a whistleblowing allegation is made.
- In some exceptional circumstances, you may need to go to an external body – an industry regulator, for example – and the independent charity Public Concern at Work can direct you towards the appropriate regulator for the type of issue you want to raise.
- This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your manager will be able to explain how you should proceed.
- Alerting the media to a concern – particularly before or during an internal investigation – is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or Public Concern at Work before being justified in approaching the press.

POLICY UPDATE

This policy will be reviewed annually, or in light of any changes in legislation or guidance, or following any learning outcomes from safeguarding incidents, concerns or allegations.

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