



Swindon Town FC Whistleblowing Policy & Procedures

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1.6	Kirk McGinn	Annual review	17th August 2023	1 st September 2024	Rob Angus



Whistleblowing Policy

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. STFC believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation, the organisation believes it can help prevent malpractice - prevention is better than cure. That is one of the aims of this policy. By encouraging a culture of openness STFC wants to encourage workers to raise issues, which concern them at work. Workers have a right and duty to raise matters of concern they may have about the services being offered by STFC or serious malpractice associated with them. Workers may be worried that by reporting such issues they will be opening themselves up to victimisation or detriment or risking their job security. However, all staff are protected by law if they raise concerns in the right way. Provided they are acting in good faith, it does not matter if they are mistaken.

By knowing about malpractice at an early stage STFC stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, please do not hesitate to “blow the whistle” on malpractice.

This policy is designed to ensure workers raise concerns properly and to ensure that mechanisms exist in STFC whereby issues raised by workers will be addressed quickly and effectively. The policy also sets out the legitimate course of action, which may be taken by the worker to raise issues with parties outside the Foundation if an issue is not addressed by the organisation, or it is felt that by raising it internally may lead to evidence of malpractice being concealed. The purpose of this policy is to outline how workers may deal with concerns about other workers and/or service provision which may have an impact or threaten the wider public interest. Please note that this policy does not affect the existing Grievance Procedure. If workers have a complaint about their own personal circumstances, then they should use the normal Grievance Procedure. This policy is applicable to all STFC workers.

Procedure for raising a concern

Concerns will be treated delicately and confidentially with every attempt to be made to keep your identity protected if that is your wish. Information received will be passed on to the required individuals or groups, there may also be a need for you to deliver a written statement or act as a witness in future enquiries, all which will be discussed with you initially.

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Step 1

If you wish to raise a concern you should normally raise it with your line manager, or with the Designated Safeguarding Officer (DSO) if you are not an employee of Swindon Town Football Club. This can be done in person or in writing.

Swindon Town Football Club recognises that sometimes it may be inappropriate for you to approach your line manager or the DSO with your concern. In these circumstances, a number of alternatives are available depending on the nature of your concern. You can contact any of the following:-

- The FA
- The EFL

Although you are not expected to prove beyond doubt the truth of your concerns, you will need to demonstrate that you have sufficient evidence or other reasonable ground to raise them.

Step 2

The person with whom you have raised your concern will acknowledge its receipt as soon as possible and will write to you within 28 days to let you know how your concern will be dealt with. The information you can then expect to receive is:

- An indication of how the concern will be dealt with
- An estimate of how long it will take to provide a final response
- Whether any initial enquiries have been made
- Whether further investigation will take place, and if not why not
- Information about support available for you

The person with whom you have raised your concern will at the same time notify the DSO that a whistleblowing allegation has been made.

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Step 3

Initial enquiries will be made to decide whether an investigation is appropriate. Where an investigation is necessary, it may take the form of one or more of the following:-

- An internal investigation by the DSO, which may, for example, take the form of a disciplinary investigation
- A referral to the EFL

Step 4

You will be informed of the outcome of any investigation, in writing, and/or of any action taken, subject to the constraints of confidentiality and the law. If you do not feel your concern has been addressed adequately you may raise it with an independent body such as one of the following as appropriate:-

- The EFL
- The FA
- Your trade union
- The Citizen's Advice Bureau
- A relevant voluntary organisation
- The police

You must make a disclosure 'in Swindon Town Football Club's interest' and in the circumstances it must be reasonable for you to make the disclosure. If there is an issue of an exceptionally serious nature which you believe to be substantially true, then you may disclose the issue to someone other than those listed above. In determining whether it is reasonable for you to have made a disclosure the identity of the person to whom the disclosure is made will be taken into account. Disclosures to anyone outside of the recognised bodies specified may not be protected disclosures under the Act.

Confidentiality:

Swindon Town Football Club will do its utmost to keep confidential the identity of a whistle-blower. Should any allegations be made through whistleblowing it should be noted that a statement may be needed to form part of the evidence.

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Should the whistle-blower need to be identified 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 the club's DSO or CEO 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. In writing to safeguarding@swindontownfc.co.uk or on 07432 030913.

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 alerter.

Should any concerns or allegations be made, Swindon Town FC would encourage the whistle-blower 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 Swindon Town Football Club receive any anonymous allegations these will be investigated so far as is possible based on the limited information available.

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 whistle-blower. If, however, it is established that they have made malicious allegations, disciplinary action may be taken against them. In such cases, Swindon Town Football Club's disciplinary policy/procedure will apply.