BRISTOL ROVERS FOOTBALL CLUB AND ACADEMY

Whistleblowing Policy



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Approved by: Board of Directors

Whistleblowing Policy

Introduction

Bristol Rovers 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. This Football Club has a culture of openness and accountability and this policy is intended to encourage staff to report any concerns or suspected wrongdoing as soon as possible, to provide guidance as to how to raise those concerns and to reassure staff that they are able to raise genuine concerns in good faith without fear of reprisals.

Bristol Rovers FC is committed to be compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption.

Although disclosure may be made to certain public authorities, the Club's policy is that disclosures should be made in the first instance to the Company. We strongly recommend that you seek advice from the Company before reporting a concern to anyone external.

Purpose

This policy sets out how individuals can raise concerns about the safety and welfare of apprentices, children, young people or Adults at Risk who participate or engage in any services and activities conducted under the name of Bristol Rovers Football Club. It will provide a method of raising concerns and will detail how feedback may be received in relation to any action(s) taken.

Bristol Rovers Football Club will aim to ensure that individuals:

- Get a response to their concerns.
- Are made aware of how to pursue the concern further if they are not satisfied with the response.
- Are reassured that individuals will be protected from reprisals or victimisation for whistleblowing in good faith.

Policy Statement

Players, coaches, other employees, volunteers, officials, parents, carers 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, apprentices and service users. 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. Bristol Rovers 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 Bristol Rovers 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.

Specific Subject Matter

If, in the course of employment, an employee or volunteer becomes aware of information which they reasonably believe tends to show one or more of the following, they must use the Club's disclosure procedure set out below:

- That a criminal offence has been committed is being committed or is likely to be committed.
- That a person has failed is failing or is likely to fail to comply with any legal obligation to which he is subject.
- That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- That the health or safety of any individual has been, is being, or is likely to be, endangered.
- That the environment, has been, is being, or is likely to be, damaged.
- That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- That any person associated with the Club has been, is being, or is likely to be receiving or offering bribes.

Disclosure Procedure

Information an employee reasonably believes tends to show one or more of the above should promptly be disclosed to their line manager so that any appropriate action can be taken.

If it is inappropriate to make such a disclosure to the line manager, the employee should speak to the Director of Bristol Rovers FC.

Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure. However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'

Safeguarding

Bristol Rovers 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, Bristol Rovers Football Club 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 Bristol Rovers Football Club's disciplinary policy and procedures (and as a result may face expulsion from the Club).

Confidentiality

Bristol Rovers Football Club will do its upmost best 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 for any reason or it becomes apparent that the whistleblower will be identified because of any subsequent investigation, notice will be given to the whistleblower, by a representative of Bristol Rovers Football Club (usually the Club's Lead 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, Bristol Council Social Care, 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 Trust'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)

Vulnerable Adults Bristol Council Social Care 0117 922 2700 outside office hours = 01454 615165

Raising a Concern or Making an Allegation

Anyone wishing to raise a concern should do so either verbally or in writing to Bristol Rover's Football Club Senior Safeguarding Officer. The concern needs to be as specific as possible including any names, dates and locations (where possible). The Club's Senior Safeguarding Officer can be contacted either by phone 07828 113952 or through email safeguarding@bristolrovers.co.uk The Club's safeguarding policy also provides the names and contact details of safeguarding and welfare staff across the Club's sites and for external agencies.

Should any concerns or allegations be made Bristol Rovers Football Club would encourage the whistleblower to put their name to the allegation. Any anonymous concerns / allegations are much less powerful and are therefore much harder to investigate as outlined above but all concerns shared will be taken seriously and investigated where possible.

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. If, however, it is established that they have made malicious allegations disciplinary action may be taken against them. In such cases, Bristol Rovers Football Club disciplinary policy and procedures will apply.

All investigations will initially be undertaken by the Club's Senior Safeguarding Officer with support where appropriate from another designated safeguarding officer and/or external statutory or safeguarding expertise. However, should you feel that you have not received a satisfactory response to your concern you can approach the following people or organisations:

- The FA Child Protection Team on 0207 745 4771 or by writing to The FA Case Manager, The Football Association, Wembley Stadium, Wembley, London, HA9 0WS
- **EFL Safeguarding Manager:** Alexandra Richards Tel: 07792 284740 Email: arichards@efl.com
- The FA / NSPCC Child Protection 24-Hour Helpline 0808 800 5000.

Or by going directly to the Police and/or Social Services