



Stockport County
Football Club

Whistleblowing Policy

Policy Statement

Stockport County Football Club ('the Club') is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

Purpose

The aims of this policy are:

- To encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide guidance as to how to raise those concerns.
- To reassure individuals that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Scope

Everyone involved in activity carried out under the jurisdiction of Stockport County Football Club, including the Academy, the First team and the Community Trust.

The policy covers all employees, contractors, volunteers, casual workers and agency workers.

The policy does not form part of any employees contract of employment and we may amend it at any time.

What is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- (a) criminal activity;
- (b) miscarriages of justice;
- (c) danger to health and safety;
- (d) damage to the environment;
- (e) failure to comply with any legal obligation or regulatory requirements;
- (f) financial fraud or mismanagement;
- (g) negligence;
- (h) breach of our internal policies and procedures;
- (i) conduct likely to damage our reputation;
- (j) the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (**a whistleblowing concern**) you should report it under this policy.

How to raise a concern?

We hope that in many cases you will be able to raise any concerns with your Line Manager. However, where you prefer not to raise it with your Line Manager for any reason, you should contact the Department Head. In some cases, they may refer the matter to the Head of People. Where the matter is more serious, or you feel that your line manager is involved or has not addressed your concern, you should contact one of the following:

The Head of People – Ellie O'Connor
The Chief Operating Officer – Tom Mahon
The Safeguarding Officer – Amy Heaton
Chief Executive Officer – Jonathan Vaughan

We will arrange a meeting with you within 7 working days, to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

If you are not satisfied with how the Club has dealt with your concern, you can contact the Advisory-Conciliation and Arbitration service (ACAS), The Whistleblowing Charity "Protect" or your Trade Union for more guidance.

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, the Club's disciplinary policy and procedures will apply.

Safeguarding

If you are worried about a safeguarding or child protection issue, then we would encourage you to speak to the Clubs Safeguarding Officer. However, if you are concerned about their actions or if you think that Stockport County are putting vulnerable adults or children at risk, then please contact EFL or the FA, on the details below.

Alternatively, you can go directly to the Police, or Childrens Social Care, on the details below. The Club realises 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, and 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, the 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 the Club's disciplinary policy and procedures.

Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity anonymous. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage employees to make disclosures anonymously. That is because proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Director, People and Culture or one of the other contact points listed in this policy and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline (helpline: 0207404 6609, email: whistle@pcaw.org.uk and website <http://www.pcaw.org.uk>).

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, rectifying and resolving any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work (details as above), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a visitor, supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions, or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in this policy for guidance.

Contact Details

Designated Safeguarding Officer: Amy Heaton - amy.heaton@stockportcounty.com / 07974897518

Head of People: Ellie O'Connor - ellie.oconnor@stockportcounty.com / 07977618111

Local Police: In an emergency 999, if this does not require an immediate response 101

Children's Social Care services website: www.stockport.gov.uk / T: 0161 217 6028.

The Child Protection in Sport Unit at: <https://thecpsu.org.uk>

The NSPCC Helpline on 0808 800 5000 or email: help@nspcc.org.uk

FA Safeguarding Team email: safeguarding@TheFA.com.

EFL Safeguarding Team email: arichards@efl.com

Public Concern at Work: T: 0207404 6609 / E: whistle@pcaw.org.uk / W: <http://www.pcaw.org.uk>

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Approved By Chief Executive Officer	Jonathan Vaughan - CEO
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