Swindon Town FC
Community Foundation

Swindon Town FC **Community Foundation**
Football in the Community

Foundation Park, County Ground Lane, Swindon, Wiltshire SN1 2FD
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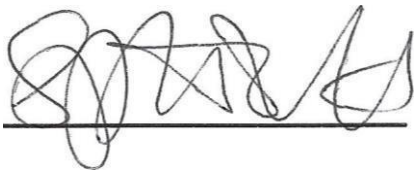
Swindon Town FC Community Foundation

Whistle-Blowing Policy

Latest review: November 2026

Date of next review: November 2027

This policy and set of procedures will be reviewed on an annual basis, or sooner should any major incident, organisational or legislative change arise.

Signed 

Shane Hewlett (Senior Safeguarding Manager)

Signed 

Kirsteen Fraser (Safeguarding Lead Trustee)

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1. Introduction

1.1 Employees, Managers and Trustees are often the first to realise that there may be something seriously wrong within a trust. However, they may not express concerns because they feel that speaking up would be disloyal to their colleagues or to the organisation. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2 The organisation is committed to the highest possible level of openness and accountability. In line with that commitment, we encourage employees and others with serious concerns about any aspect of Swindon Town FC Community Foundation's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This procedure document makes it clear that staff can do so without fear of reprisals. This Disclosure Policy is intended to encourage and enable staff to raise serious concerns within Swindon Town FC Community Foundation rather than overlooking a problem or blowing the whistle outside of the organisation.

1.3 This Disclosure Policy has been devised in accordance with the provisions of the Public Interest Disclosure Act 1998 and seeks to bring into the open concerns of the staff and public relating to issues concerning dishonesty involving Swindon Town FC Community Foundation.

1.4 This procedure supports Swindon Town FC Community Foundation's anti-fraud and corruption approach, and makes it clear that concerns can be raised without fear of reprisals. It is intended to encourage and enable employees and Trustees to raise serious concerns within Swindon Town FC Community Foundation, irrespective of seniority, rank or status, rather than overlooking a problem or reporting the matter externally.

2. Aims and Scope of the Policy and Procedure

2.1 This procedure aims to:

- Provide avenues for staff to raise concerns and receive feedback on any action taken
- Allow staff to take the matter further if they are dissatisfied with Swindon Town FC Community Foundation's response
- Reassure staff that they will be protected from reprisals or victimisation for Whistle-Blowing in good faith.

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2.2 There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. This Disclosure Policy is intended to cover concerns that fall outside the scope of that procedure.

2.3 That concern may be about something that:

- Is unlawful
- Is contrary to Swindon Town FC Community Foundation's Standing Orders or policies
- Falls below established practice
- Amounts to improper conduct

For example (this list is not exhaustive):

- Malpractice or ill treatment of a client/customer
- A criminal offence has been committed, is being committed or is likely to be committed
- Suspected fraud
- Disregard for legislation, particularly in relation to health and safety at work
- Breach of Financial Regulations, Standing Orders
- Showing undue favour over a contractual matter or to a job applicant
- A breach of any code of conduct or protocol
- Information on any of the above has been, is being, or is likely to be concealed.

2.4 The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions applied.

3. Safeguarding Harassment or Victimisation

3.1 Swindon Town FC Community Foundation recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. Swindon Town FC Community Foundation will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith. Swindon Town FC Community Foundation will treat any harassment or victimisation as a serious disciplinary offence to be dealt with under the Disciplinary Procedure.

3.2 This does not mean that if staff are already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their Whistle-Blowing.

3.3 Swindon Town FC Community Foundation will do its best to protect a staff member's identity when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by staff may be required as part of the evidence.

3.4 This procedure encourages staff to put their name to their allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of Swindon Town FC Community Foundation.

3.5 In exercising the discretion, the factors to be taken into account would include the:

- seriousness of the issues raised
- credibility of the concern
- Likelihood of confirming the allegation from an attributable source.

3.6 If staff make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, staff make malicious allegations, disciplinary action may be taken against them.

4. How to Raise a Concern

4.1 Employees who raise concerns that fall within the scope of other Community Foundation procedures will not be dealt with in this procedure but will be advised on the appropriate procedure to use. Such employees will still receive protection as detailed in this procedure.

4.2 As a first step, staff should normally raise concerns with their immediate line manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If in doubt, contact one of the Trustees or the Chairman of Swindon Town FC Community Foundation.

4.3 Concerns are better raised in writing. Staff are invited to set out the background and history of their concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. If staff do not feel able to put their concern in writing, they can telephone or meet the appropriate person. The earlier staff express the concern, the easier it is to take action.

4.4 Although staff are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.

4.5 Advice and guidance on matters of concern may be pursued and can be obtained from:

- Line Manager
- Trustees
- Chairman of Swindon Town FC Community Foundation
- Football League Trust Area Manager

4.6 Staff may invite a trade union representative (if applicable) or work colleague to raise a matter on their behalf.

5. How Swindon Town FC Community Foundation Will Respond

5.1 The action taken by Swindon Town FC Community Foundation will depend on the nature of the concern and may:

- be resolved by agreed action without the need for investigation
- be investigated internally
- be referred to the Police and other relevant authorities (e.g. Social Services)
- form the subject of an independent inquiry

5.2 In order to protect individuals and Swindon Town FC Community Foundation, initial enquiries will be forwarded to the Line Manager who will consult with the Chairman of Swindon Town FC Community Foundation and decide whether an investigation is appropriate and, if so, what form it should take. In the event of the Line Manager and the Chairman being named on the complaint, the English Football League Trust will take the place of whoever is named. The Chairman of Swindon Town FC Community Foundation can decide to take no further action if a complaint appears to be trivial or vexatious. All such decisions will be reported to the next meeting of Trustees. Concerns or allegations that fall within the scope of specific procedures, for example discrimination issues, will normally be referred for consideration under those procedures.

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5.3 Some concerns may be resolved by agreed action without the need for investigation and staff will be involved in those discussions. Any such incidents will be reported at the Trustees' Meeting.

5.4 If an investigation is required, the Line Manager or Chairman of Swindon Town FC Community Foundation will investigate the concern. Following this that officer will, within ten working days, write to the member of staff:

- Acknowledging that an investigation will be carried out
- Indicating how he/she proposes to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling them whether any initial enquiries have been made
- Telling them whether further investigations will take place, and if not, why not
- Advising them that any investigation will be carried out in the strictest confidence
- Keeping them informed of the progress of the investigation.

5.5 The amount of contact between the officers considering the issues and the staff member will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from staff.

5.6 When any meeting is arranged, staff have the right, if they so wish, to be accompanied by a union representative or work colleague who is not involved in the area of work to which the concern relates.

5.7 Swindon Town FC Community Foundation will take steps to minimise any difficulties that staff may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, Swindon Town FC Community Foundation will advise them about the procedure.

5.8 The person carrying out the investigation will report on the outcome of any investigation to the Trustees who will monitor the implementation of the recommendation of the investigation.

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6. How the Matter can be Taken Further

6.1 This procedure is intended to provide staff with an avenue to raise concerns within Swindon Town FC Community Foundation. Swindon Town FC Community Foundation hopes staff will be satisfied. If they are not, and feel that it is right to take the matter outside Swindon Town FC Community Foundation, the following are possible contact points:

- Chairman of Swindon Town FC Community Foundation
- Relevant professional bodies or regulatory organisations
- Solicitor
- The Police
- An independent person or organisation nominated for the purpose by Swindon Town FC Community Foundation
- Public Concern at Work.

If staff do take this matter outside Swindon Town FC Community Foundation, they need to ensure that they do not disclose confidential information or that disclosure would be privileged. Staff should check with the contact point about that.

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7. Allegations against the DSO or SSM

The Investigation Process will be undertaken by the DSO, who may be supported by an appropriate member of Swindon Town FC Community Foundation Senior Management Team. However, should your allegation concern the DSO, SSM, or Head of Foundation, or have not received a satisfactory response or conclusion to your concern you can approach the following people:

Wendy Craig, Swindon Town FC Community Foundation (Education)	07760558595
Mark Derrien DSO EFL Trust	07944272236
Tara Lawson – EFL Safeguarding and Incident Manager	07964905652
Swindon Lado	01793 466849
To raise a concern or to make a referral about Vulnerable Adults	(Swindon) 01793 463555 Emergency Duty Service: Weekends & Night 01793436699 (Wiltshire) 0300 456 0111 Emergency Duty Service 0845 607 0888
To raise a concern or make a referral about a child or young person (under the age of 18) Multi Agency Safeguarding Hub (MASH)	(Swindon) 01793 466903 Emergency Duty Service 01793436699 (Wiltshire) 0300 4560 108 Emergency Duty Service 0845 6070888
Police	101 or 999 Emergency Services
The FA Safeguarding Team	0800 169 1863
NSPCC helpline	0808 800 5000
NSPCC Whistle-Blowing helpline	0800 028 0285
Referral Forms for Referral To Children's Social Care	https://safeguardingpartnership.swindon.gov.uk/downloads/file/630/referral_form_-_rf1
Referral Forms for Referral To Adult Social Care	https://www.swindon.gov.uk/info/20011/adult_social_care_and_support/1120/report_a_concern_about_an_adult_at_risk_of_or_experiencing_harm

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8. The Role of the Monitoring Officer

8.1 The Monitoring Officer (this will usually be the Line Manager or Chairman of Swindon Town FC Community Foundation unless named in the investigation when it will be handed over to the Football League Trust) has overall responsibility for the maintenance and operation of this procedure, and s/he will liaise as necessary with the Trustees and Community Foundation Chairman.

8.2 The Monitoring Officer maintains a record of concerns raised on Swindon Town FC My Concern system which can be accessed by the necessary Trustees.

9. The Law

9.1 This procedure has been written to take account of the Public Interest Disclosure Act 1998, which protects workers making disclosures about certain matters of concern, where those disclosures are made in accordance with the Act's provisions.

9.2 The Act is incorporated into the Employments Rights Act 1996, which also already protects employees who take action over, or raise concerns about health and safety at work. For the avoidance of doubt, financial issues are covered by Section 151 Local Government Act 1972, Section 114 of the Local Government Finance Act 1988, The Local Government and Housing Act 1989, and Accounts and Audit Regulations 2003.

10. Equality, Diversity and Inclusion

Football is for everyone, it belongs to, and should be enjoyed by anyone who wants to participate in it, whether as a player, official, staff member, volunteer or spectator. Swindon Town FC Community Foundation recognises that providing equality of opportunity, valuing diversity and promoting a culture of inclusion are vital to our success.

We want our staff, coaches, volunteers and participants to reflect the diversity of the communities that we serve and influence. We aim to be a place where people can be free to be themselves no matter what their identity or background. We will ensure that equality is embedded in all of our activities, policies and decisions.

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To report incidents and allegations of discriminatory actions or behaviour, our equality, diversity and inclusion policy is available at www.stfcfoundation.com

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