



Worcester City Women's Football Club ("WCWFC", "the Club")

Policy: **Whistleblowing policy**

Purpose: To ensure that the Club operates in an appropriate way and there is a mechanism for raising wrongdoing in the workplace.

Values: Respectful, inspiring, successful, and exceptional

Scope: This policy applies to our employees, players, coaches, support teams, interns, apprentices, supporters, and volunteers. If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under the grievance procedure.

Associated policies: Disciplinary procedures; Grievance procedures.

WCWFC reserve the right to amend or withdraw this policy at any time.

If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to the Club CEO or Board Champion – People.

The Club CEO is the person with responsibility for data protection compliance within WCWFC. They can be contacted at nicole@wcwfc.co.uk. Questions about this policy, or requests for further information, should be directed to them.

Definitions:

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;

- a risk to the health and safety of an individual;
- damage to the environment; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

Stage 1 - Raising a whistleblowing concern

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with the Club CEO. If your concern relates to the Club CEO, or for any reason you do not wish to approach the Club CEO, you should raise your concern with the Board Champion – People.

You can raise your concern orally, or in writing (including via email). It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, the Board Champion – People may also be present.

Stage 2 - Responding to your whistleblowing concern

The Club CEO to whom you raise your concern will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The Club will write to you confirming that they are conducting an investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

Following the investigation, the Club will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example

where data protection rules apply or there are sensitive issues that need to remain confidential.

Stage 3 - Appeal

If you are not satisfied with how your concern has been dealt with, you should appeal to the Board Champion – People.

You can raise your appeal orally, or in writing (including email). It is important that you set out clearly the grounds of your appeal, i.e., the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, the Board Champion – People may also attend.

The Club will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

Confidentiality and anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously.

We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback.

Our commitment to you

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to The Club CEO. In the alternative, you can raise it under our grievance procedure.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence and will be dealt with under our disciplinary procedure.

Raising your whistleblowing concerns externally

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (you can find a list of bodies at www.gov.uk)

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.