



WHISTLEBLOWING POLICY

Policy Statement

1.1. Derby 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

2.1. The aims of this policy are:

- 2.1.1. 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.
- 2.1.2. To provide guidance as to how to raise those concerns.
- 2.1.3. 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

3.1. Everyone involved in activity carried out under the jurisdiction of Derby County Football Club is covered by this policy.

What is whistleblowing?

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

- 4.1.1. criminal activity;
- 4.1.2. miscarriages of justice;
- 4.1.3. danger to health and safety;
- 4.1.4. damage to the environment;
- 4.1.5. failure to comply with any legal obligation or regulatory requirements;
- 4.1.6. the deliberate concealment of any of the above matters.

4.2. 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.

4.3. Employees have certain common law confidentiality obligations to their employer. However, in a limited set of circumstances whistleblowing may override these obligations if an employee reveals information about their employment or the work of the organisation. This is intended to provide guidance on the circumstances under



which disclosures may lawfully be made and follows those outlined by law in the Sexual Offences Act 2003.

Safeguarding

- 4.4. 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.
- 4.5. 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.

Raising a whistleblowing concern

- 4.6. Anyone wishing to raise a concern should do so either verbally or in writing to the Designated Senior Safeguarding Manager. The concern needs to be as specific as possible including any names, dates and locations (where possible). The Designated Senior Safeguarding Manager can be contacted either by phone or via email. The Club's Safeguarding policies also provide the names and contact details of external agencies for concerns relating to a child or adult at risk.
- 4.7. Should any concerns or allegations be made the Club would encourage the whistleblower to put their name to the allegation. Any anonymous concerns / allegations are much harder to investigate but all concerns shared will be taken seriously and investigated where possible. If an individual should feel unable to disclose their identity in relation to a safeguarding concern, then the Club would encourage the reporting of that concern in good faith internally and to external agencies such as the NSPCC. Contact details for external agencies are contained in the Safeguarding Children and Young People and Safeguarding Adults At Risk policies.
- 4.8. A meeting will be arranged with you within 14 days if required. We will also aim to give you an indication of how we propose to deal with the matter if it is appropriate to do so.
- 4.9. 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.
- 4.10. All investigations will initially be undertaken by the Club's Designated Senior Safeguarding Manager or a member of the HR Department as appropriate. You will



be informed of the outcome of any investigation subject to the constraints of confidentiality and the law.

- 4.11. If you do not feel that your concern has been adequately addressed, you may raise it with a relevant external independent body.

Confidentiality

- 4.12. We hope that individuals will feel able to voice whistleblowing concerns openly under this policy. However, if an individual wishes to raise a concern confidentially, we will make every effort to keep the individual's identity secret. If it is necessary for anyone investigating the concern to know the individual's identity, we will discuss this with the individual in the first instance.
- 4.13. We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from the staff member. 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 Head of Human Resources and appropriate measures can then be taken to preserve confidentiality.

Contact Details

Safeguarding Senior Manager
Tony Brittan
07912 268915
safeguarding@dcfc.co.uk

Local Police or Children's Social Care services website: derby.gov.uk

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