

The Valley, Floyd Road, Charlton, London SE7 8BL www.cafc.co.uk

# **Whistleblowing Policy 2025–2026**

### 1. Purpose

This policy outlines the procedures for reporting concerns about wrongdoing within the organisation. It ensures that disclosures are handled appropriately, confidentially, and without fear of reprisal.

#### 2. Legal Framework

This policy is underpinned by the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, which protects workers who disclose information in the public interest.

#### 3. Scope of Whistleblowing

To be protected under whistleblowing law, the disclosure must:

- Be made in the public interest.
- Relate to one or more of the following:
  - Criminal offences
  - Failure to comply with legal obligations
  - Miscarriages of justice
  - Threats to health and safety
  - Environmental damage
  - Deliberate concealment of any of the above

### 4. Examples of Whistleblowing Concerns

- Unsafe working practices or conditions
- Inadequate staff training or induction
- A bullying culture
- Financial irregularities
- EDI-related misconduct

#### 5. Low-Level Concerns

A low-level concern refers to behaviour that:

Contravenes the staff code of conduct















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- Occurs outside of work but raises professional concerns
- Does not meet the threshold for harm or referral to external authorities

All low-level concerns must still be reported for internal investigation.

#### **6. Reporting Procedures**

#### **Internal Reporting**

- Discuss concerns with your line manager.
- If not appropriate, contact another member of the management team or the **Director** responsible.
- If management involvement is suspected, contact the **Safeguarding Manager**:

Ken Palmer - Kenneth.palmer@cafc.co.uk

## **External Reporting**

If internal reporting is not viable, staff may contact:

**NSPCC Whistleblowing Advice Line** 

0800 028 0285

help@nspcc.org.uk

Mon-Fri: 08:00-20:00 | Weekends: 09:00-18:00

#### 7. Confidentiality and Protection

- All disclosures will be treated confidentially.
- Whistleblowers will be kept informed of investigation progress.
- No employee will suffer detriment for making a bona fide disclosure.
- Victimisation of whistleblowers will not be tolerated.
- Confidentiality We encourage openness but will respect confidentiality if requested. If an investigation requires disclosure of an individual's identity, this will be discussed first.
- Anonymous disclosures are not encouraged, as they can limit the ability to investigate. Individuals concerned about retaliation may contact the Head of Human Resources to discuss confidentiality measures.

### 8. Whistleblower Support

We are committed to supporting individuals who raise concerns in good faith. Whistleblowers play a vital role in maintaining transparency, safety, and integrity within the organisation.

Support Measures Available:















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Confidentiality Protection from Detriment Access to Advice (Protect, ACAS) **Emotional Support Grievance Redress** 

Support During Investigations: Whistleblowers will be kept informed of the progress of any investigation. Where appropriate, they may be asked to provide further information or a formal statement. The organisation will ensure that whistleblowers are not isolated or disadvantaged during this process.

## 9. Misuse of Policy

Disclosures made in bad faith (e.g., malicious intent or personal grudges) may result in disciplinary action.

## 10. Record Keeping and Documentation

- Keep relevant documentation secure.
- Do not leave evidence in open areas.
- Do not attempt to investigate the matter yourself.

## 11. Summary of Dos and Don'ts

<b>☑</b> DO	<b>X</b> DON'T	
Report promptly	Do nothing	
Use correct procedures	Investigate yourself	
Keep documentation safe	Leave evidence unsecured	
Raise concerns with authorised persons	Accuse individuals directly	
Feel assured your concerns will be taken seriously	Be afraid to speak up	

### 12. Review Cycle

This policy will be reviewed bi-annually or earlier if required due to legislative changes or best practice updates.















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#### 13. Version History

Version	Date	Originator	Authorised	Review annually
1.0	September 2025	Kenneth Palmer Safeguarding Manager		

### Appendix - 1

#### Other External Reporting contacts:

Local Police or Social Services

FA Safeguarding Team: safeguarding@TheFA.com

EFL Safeguarding Team: arichards@efl.com

## **Anonymous Reporting - FAQs**

Q1: Can I report a concern without giving my name?

Yes. You can report anonymously either internally or through external advice lines. However, providing contact details can help us investigate more effectively.

Q2: Will my concern still be investigated if I remain anonymous?

Yes. All concerns are taken seriously. However, the ability to investigate may be limited without further information or clarification.

Q3: How can I ensure my identity remains protected if I choose to disclose it later? If you choose to reveal your identity after initially reporting anonymously, we will treat your information confidentially and take steps to protect you from any detriment.

Q4: What if I fear retaliation even if I report anonymously?

The organisation has a zero-tolerance policy for victimisation. If your identity becomes known, you will be protected under whistleblowing law and internal grievance procedures.

Q5: Can I follow up on an anonymous report?

If you provide a secure way for us to contact you (e.g., anonymous email), we may be able to update you on the progress of the investigation.

## **Summary of Whistleblower Rights**

- 1. Right to Protection from Detriment
- 2. Right to Confidentiality
- 3. Right to a Fair Investigation
- 4. Right to Report Anonymously















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- 5. Right to External Reporting
- 6. Right to Support
- 7. Right to Be Heard

### References

- Public Interest Disclosure Act 1998 (PIDA): https://protect-advice.org.uk/pida/
- Employment Rights Act 1996
- Protect UK Whistleblowing Charity: https://protect-advice.org.uk/
- NSPCC Whistleblowing Advice Line: https://www.nspcc.org.uk/keeping-children-safe/reportingabuse/dedicated-helplines/whistleblowing-advice-line/

Reviewed

**Ratified by Board of Directors** 

**Next Review** 

By











