



Bloomsbury Football Foundation

Whistleblowing Policy

Created: December 2023

Effective date: February 2025

Revised by: Head of Safeguarding and Governance

Next review date: February 2026

1. Introduction

- 1.1. This Policy outlines what you should do if you suspect something at Bloomsbury Football Foundation (“BFF”, “we” or “us”) is putting you or others in danger or is illegal or unethical. Therefore, this policy defines whistleblowing, describes the process of reporting a whistleblowing concern, and sets out how whistleblowing reports will be managed.
- 1.2. This Policy applies to our trustees, employees, officers, consultants, self-employed contractors, subcontractor coaches, agency workers, volunteers and interns.
- 1.3. This Policy does not form part of your contract with us. We reserve the right to amend or remove this Policy.

2. What is whistleblowing?

- 2.1. Whistleblowing is the name given to the reporting of certain types of wrongdoing by people who work for us. This will usually, although not always, be something you have seen or noticed at work. We aim to maintain high standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or that breaches ethical or professional codes. We will take your concerns seriously; they will be thoroughly investigated, and you can be confident there will be no reprisals.
- 2.2. The types of concerns you may want to ‘blow the whistle’ about include any activity which you suspect:
 - a) Is criminal
 - b) Miscarriages of justice
 - c) Shows a failure to comply with any legal, professional or regulatory obligation
 - d) Poses a danger to health and safety
 - e) Bribery
 - f) Negligence
 - g) May damage the environment

- h) May breach Bloomsbury Football Foundation's internal policies and procedures
 - i) Unauthorised disclosure of confidential information
 - j) May facilitate tax evasion
 - k) Shows financial fraud or mismanagement or the deliberate concealment of any of the above matters
- 2.3. Genuine concerns raised in relation to any of the above are likely to amount to whistleblowing. If you are not sure whether something you wish to raise is covered by this Policy, then speak to your line manager who will be able to provide guidance.

3. What you should do if you have a complaint but are not 'blowing the whistle'

- 3.1. If you have a complaint or issue which does not fall into the categories listed above or relates to a personal matter, then these should generally be raised using our Grievance Policy. If your complaint relates to the conduct of others towards you, then you should also refer to our Anti-Bullying & Harassment Policy. Alternatively, if you are not an employee, contractor, or volunteer, you can use the Complaints Policy located in the safeguarding tab of the website to raise a complaint. Any concerns relating to safeguarding should be raised to safeguarding@bloomsburyfootball.com.

4. How to raise a whistleblowing concern

- 4.1. You should usually raise a whistleblowing concern with your line manager. This can be done informally and does not need to be done in writing. Your line manager can provide advice regarding appropriate next steps. If the matter involves your line manager or if the concern you wish to raise is very serious, then you should proceed immediately to the more formal process set out below.
- 4.2. If the matter is not or cannot be resolved informally, put your concern in writing and send it to the CEO. This can be done either by letter or by email (see s5). Please specify that you are raising a concern under the Whistleblowing Policy. Include as much information in your correspondence as possible, including facts, events, dates, times and the people involved.
- 4.3. If the matter regards the CEO, alert the Head of Safeguarding and Governance (see s5) that you require the Board of Trustee's Whistleblowing Representative's contact details. You will be provided these details within five working days. Once the details have been provided, please raise your concern with this individual. If you still have not been given these details and the Head of Safeguarding and Governance is not on annual leave, raise the concern with Protect (see s10.2).
- 4.4. We will hold a meeting with you to discuss the issues you have raised. You are entitled to be accompanied at this meeting, and any other meetings held under this Policy, by a work colleague or trade union representative. You (and your companion, if appropriate) may be asked to keep the matter confidential whilst an investigation takes place.
- 4.5. We will investigate your concerns in full. We will keep you informed of our progress insofar as we can, but there may be elements which we decide should remain confidential.

- 4.6. We will confirm the outcome of our investigation to you insofar as we can. If you are dissatisfied with the process, you may request to escalate your concern to the Whistleblowing Representative on the Board of Trustees or, if necessary, with Protect (see s10.2).

5. Key Contacts

Head of Safeguarding and Governance

- **Name: Peter Marment**
- **Email: p.marment@bloomsburyfootball.com**

Chief Executive Officer

- **Name: Charlie Hyman**
- **Email: c.hyman@bloomsburyfootball.com**

6. Confidentiality

- 6.1. We discourage you from making anonymous disclosures as they are very difficult for us to investigate. We cannot properly establish whether allegations are credible without being able to ask you for more details or clarification, and this makes it hard to reach an informed decision.
- 6.2. We will protect anyone who blows the whistle in good faith, even if we do not agree that the allegations they raise are correct. You should feel able to openly raise issues with us under this Policy. However, we understand that the subject matter covered by whistleblowing can be sensitive. If you are concerned about possible reprisals, whether from colleagues or others, you should tell your line manager who will be able to provide you with appropriate support and reassurance.
- 6.3. The sensitive nature of whistleblowing investigations means that, aside from those involved in the whistleblowing process set out above, we will try to keep your personal involvement confidential. There may be circumstances where we cannot do this, and in those circumstances, we will discuss the matter with you to explain our position.

7. External disclosures

- 7.1. This Policy outlines the process for raising, investigating and resolving wrongdoing in the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside the organisation to become involved when a whistleblowing allegation is made.
- 7.2. In some exceptional circumstances, you may decide to go to an external body – an industry regulator, for example. For instance, if you suspect a senior member of staff is involved in a cover-up, you may report this externally. However, we encourage internal reporting as the first step. The independent charity Protect (see contact details below) can direct you towards the appropriate regulator for the type of issue you want to raise.
- 7.3. This Policy covers the actions of third parties such as suppliers, service providers and clients, as well as those of our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your line manager will be able to explain how you should proceed.

- 7.4. Telling the media about a concern – particularly before or during an internal investigation – is almost never justified or appropriate in any situation. We strongly advise against this, as doing so could lead to serious disciplinary action unless exceptional circumstances apply. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator and to have taken full advice from a lawyer or from Protect (see contact details in s10.2) before being justified in approaching the press.

8. Protection for whistleblowers

- 8.1. If you raise genuine concerns under this Policy, even if you turn out to be mistaken, we will support you and you will not face any action as a result.
- 8.2. We will not dismiss you, or treat you less well, because you have blown the whistle in accordance with this Policy.
- 8.3. Individuals who raise genuine concerns under this procedure must not suffer detrimental treatment as a result of raising their concerns. Detriment includes victimisation or threats. If you believe you have been subjected to a detriment within the workplace as a result of raising concerns under this policy, you should immediately inform your line manager or alternative line manager if this is not appropriate.
- 8.4. Individuals must not threaten or retaliate against whistleblowers in any way. Individuals who victimise or retaliate against whistleblowers under this policy will be subject to disciplinary action. In some cases, the whistle-blower could have a right to sue you personally.
- 8.5. If you believe that you have been treated badly in any way after having raised a whistleblowing concern with us, then you should raise this matter with your line manager and/or raise a grievance under our Grievance Policy.

9. Abuse of this Policy

- 9.1. All whistle-blowers must act in good faith. If we believe that you have raised issues under this Policy – which you knew were untrue – in bad faith or maliciously, then we will deal with this as a disciplinary matter under our Disciplinary Policy. You may be subject to sanctions up to and including dismissal for gross misconduct.

10. Useful links and contacts

- 10.1. The following policies contain additional information and may be relevant:

- a) Disciplinary Policy and Procedure
- b) Anti-Bribery Policy
- c) Grievance Procedure
- d) Anti-Bullying & Harassment Policy
- e) Complaints Policy

10.2. You can get further advice on whistleblowing, confidentiality, and protection from reprisals at <https://protect-advice.org.uk/>. Protect is an independent charity that also offers an advice line (020 3117 2520).

11. Administration of the Whistleblowing Policy

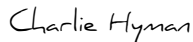
11.1. The Board of Trustees are responsible for the administration of the Whistleblowing Policy.



20 Feb 2025

Peter Marment (Feb 20, 2025, 4:32pm)


Peter Marment
Head of Safeguarding and Governance



20 Feb 2025

Charlie Hyman (Feb 20, 2025, 11:01pm)

Charlie Hyman
CEO



24 Feb 2025

Charlie Cowen (Feb 24, 2025, 5:43pm)

Charlie Cowen
Board of Trustees Chair and Whistleblowing Representative

*The procedure to review this document includes (1) the CEO will assign the Head of Safeguarding and Governance to update the document annually; (2) the Head of Safeguarding and Governance will ensure the policy's compliance with the relevant legislation and regulations; and (3) the CEO and the Board Whistleblowing Representative will review the changes made to the document and sign it off when concluded.