



WHISTLEBLOWING POLICY

Season 18/19

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Distribution

This policy will be available for all staff to view on Fulham FC's Intranet.

Managers of staff without direct access to Fulham FC's Intranet must provide access to an up to date paper copy of the policy.

Fulham Football Club

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1. Introduction

- 1.1. Fulham Football Club (“the Club”) and Fulham Foundation (FFCF) are committed to identifying and taking measures to remedy malpractice and including in relation to fraud and corruption.
- 1.2. By encouraging a culture of openness within the Club and FFCF we believe that we can prevent malpractice before it happens.
- 1.3. This policy is designed to provide you with information about the protections offered by the Public Interest Disclosure Act 1998 (‘PIDA’) as well as the process by which you may raise your concerns.
- 1.4. By knowing about malpractice at an early stage we stand a good chance of taking the necessary steps to safeguard the interests of all staff, protect our organisation and stop fraud and corruption before it happens. In short, do not hesitate to ‘speak up’ or ‘blow the whistle’ on malpractice.

2. Scope

- 2.1. This policy applies to all employees of the Club, FFCF and other workers undertaking activity on behalf of the Club or FFCF.
- 2.2. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or discuss the matter with your line manager or HR.

3. Purpose

- 3.1. To prevent malpractice by the Club and FFCF, its employees, interns, casual workers and partners by advising staff how to raise concerns with the organisation’s management or, if necessary, with the relevant department and advising them of the protection offered by the ‘PIDA’.

4. Rules, Regulations & Legislation

- 4.1. The Public Interest Disclosure Act 1998 (PIDA) is designed to ensure that workers are not unfairly discriminated against or punished for making a “protected” disclosure. Broadly, a protected disclosure is one where a worker makes a disclosure of information which shows that:
 - (a) either the employer or another worker has committed been, is committing, or is likely to be committing a criminal offence;
 - (b) either the employer or another worker has failed to comply with a legal obligation;
 - (c) there has been a miscarriage of justice;
 - (d) the health and safety of individuals has been, is being, or is likely to be endangered;
 - (e) the environment has been, is being, or is likely to be damaged;
 - (f) information relating to any of the above is being, has been or is likely to be deliberately concealed.
- 4.2. The Club and FFCF is bound by PIDA and the Club is fully committed to ensuring that any protected disclosure made by a member of staff is handled in a proper and efficient manner. In particular, the Club and FFCF is committed to ensuring that any member of staff who makes a protected disclosure is not unfairly treated or discriminated against.

5. Procedure

- 5.1. If you wish to make a protected disclosure to the Club or FFCF, you may do so either by email, letter, telephone or in person to either the Club’s General Counsel, HR or the Chair of FFCF.

- 5.2. Whilst a protected disclosure may be made anonymously, we would encourage staff to reveal their identity where possible in order to ensure that the issue may be investigated properly and feedback may be given by the Club or FFCF on the steps it has taken.
- 5.3. All protected disclosures will be treated very seriously and will be dealt with appropriately.
- 5.4. Upon receiving a disclosure, the relevant department will arrange an investigation of the matter with HR support or by someone more senior or with relevant experience or specialist knowledge. Where possible the person responsible for dealing with the protected disclosure will have no conflict of interests. The investigation may involve the individual giving a written statement. The person's disclosure statement will be taken into account and they will be asked to comment on any additional evidence obtained.
- 5.5. The individual responsible for investigating the matter will report the matter to the Club's senior management team or FFCF's Board of Trustees (if appropriate and no conflict of interests exists) which will then take any necessary action, including reporting the matter to any appropriate government department or regulatory agency.
- 5.6. If disciplinary action is required, the individual investigating the matter should follow the Club's People Management Policy. On conclusion of any investigation, the individual who has made the disclosure will be informed of the outcome of the investigation and what the senior management team or board of trustees has done, or proposes to do. If no action is to be taken, a reason for this will also be provided.
- 5.7. The Club and FFCF will look to treat any protected disclosures made in the strictest confidence, however staff should be aware that action taken as a result of their disclosure could in some circumstances lead to their identity being revealed (either by inference or as required, for example, in legal or disciplinary proceedings).
- 5.8. Staff who make a protected disclosure to the Club or FFCF in good faith will not be unfairly treated, dismissed or have disciplinary action taken against them as a direct result of having made a protected disclosure
- 5.9. Any disclosures made in bad faith may be dealt with under the Club's People Management Policy. Protection under the Whistleblowing Policy does not extend to employees who act in bad faith or raise malicious, vexatious or knowingly untrue concerns.
- 5.10. If you feel that you cannot make a protected disclosure to the Club or FFCF because you reasonably believe that they:
 - (a) will cover the issue up;
 - (b) will treat you unfairly or discriminate against you as a result; or
 - (c) will not (or has not) address the issue;

You should take advice from an independent person or body (such as ACAS) about making a protected disclosure to a person or body outside the Club/FFCF.
- 5.11. In the event that you wish to discuss any issue relating to this policy, please contact the Human Resources department in the first instance.

6. Date and review

- 6.1. This policy is applicable to Season 2018/19 and is under constant review. A revised policy will be drafted annually with the next scheduled review due in August 2019 for use in the following

season. The policy may also be subject to review following incident learning outcomes, a major incident, organisational or legislative change.