



COMMUNITY
SPORTS
FOUNDATION

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SPEAK UP POLICY {WHISTLEBLOWING}

Date of Next Update: August 2025

Scope

This policy is for the Norwich City Community Sports Foundation (“Foundation”) staff and volunteers. This includes agency, temporary, zero-hours, and consultancy, contracted staff members and volunteers.

This policy supersedes any previous policies prior to its issue date.

Policy Statement

The Foundation is committed to conducting its business with honesty and integrity and expects 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 and to address them when they do occur.

The aims of this policy are:

- a) To encourage staff 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.
- b) To provide staff with guidance as to how to raise those concerns.
- c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Policy and Procedure

Under this policy Speaking Up is the disclosure of information which relates to suspected wrongdoing or dangers at work, sometimes referred to as whistleblowing. This may include:

- a) Criminal activity
- b) Unsafe safeguarding practice
- c) Failure to comply with any legal obligation
- d) Miscarriages of justice
- e) Damage to the environment
- f) Bribery
- g) Financial fraud or mismanagement
- h) Breach of our internal policies and procedures
- i) Conduct likely to damage our reputation or our financial wellbeing
- j) Unauthorised disclosure of confidential information;
- k) Negligence;
- l) The deliberate concealment of any of the above matters.

The concerned party 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 Speak Up concern) you should report it under this policy.

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 Harassment Policy, as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from HR whose contact details are at the end of this policy.

Raising a concern

The Foundation hopes that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to HR. However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- a) Legal and Governance Director; or
- b) Executive Director

Contact details are set out at the end of this policy.

The Foundation will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

The Foundation will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter. The Foundation will treat all concerns consistently and fairly.

Confidentiality

The Foundation hopes that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, it will be discussed with you prior to your identity being disclosed. The Foundation does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Colleagues who are concerned about possible reprisals if their identity is revealed should come forward to HR and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from [Protect](#), an independent charity, that offers a confidential helpline to support individuals that are speaking up. Their contact details are at the end of this policy.

Investigation and Outcome

Once you have raised a concern, the Foundation will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, the Foundation may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the Foundation to minimise the risk of future wrongdoing.

The Foundation will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If the Foundation concludes that a concerned party has made false allegations maliciously or with a view to personal gain, that person will be subject to disciplinary action.

If you are not satisfied

While the Foundation cannot always guarantee the outcome you are seeking, it will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help the Foundation to achieve this. If you are not happy with the way in which your concern has been handled, you can raise it with Gavin Coe, Chief Operating Officer or Ian Thornton, Chief Executive Officer, or the Club's external auditors. Contact details are set out at the end of this policy.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. The Foundation strongly encourages you to seek advice before reporting a concern to anyone external. The independent charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Speak Up concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, the Foundation encourages you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in the key contacts section below for more guidance.

Protection and support for concerned parties

It is understandable that colleagues speaking up are sometimes worried about possible repercussions. We aim to encourage openness and will support staff that raises genuine concerns under this policy, even if they turn out to be mistaken.

Concerned parties must not suffer any detrimental treatment as a result of speaking up. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against a person that has spoken up under this policy in any way. If you are involved in such conduct, you may be subject to disciplinary action.

Responsibility and Key Contacts

HR, the Chief Operating Officer and the Chief Executive Officer are responsible for ensuring that concerns are taken seriously and dealt with as quickly as possible.

Line managers are responsible for ensuring that any complaints they receive that may constitute a concern under the Speak Up policy, are passed to the Speak Up Officer as a matter of urgency.

Line managers are also responsible for ensuring that employees who raise a Speak Up concern do not suffer a detriment as a result of raising the matter.

The Legal and HR teams are responsible for providing advice and guidance on this policy and relevant legislation.

Key Contacts

Name	Job Title	Email
Rachel Boyce	HR Advisor	Rachel.boyce@norwichcitycsf.org.uk
Gav Coe	Chief Operating Officer	Gavin.coe@norwichcitycsf.org.uk
Ian Thornton	Chief Executive Officer	ian.thornton@norwichcitycsf.org.uk

Protect is an independent charity that offers a confidential helpline to support concerned parties. You can contact them for advice on 020 3117 2520 (option 1) or at whistle@protectadvice.org.uk

Associated Policies

Grievance Policy
Disciplinary Policy and Procedure
EDI Policy

Policy Issue Date: August 2024

Date of Next Update: August 2025

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Foundation requirements, or relevant legislation.

