



Whistleblowing Policy

Document Version 1.0

Policy Owner:	Mark Cornish, Director
Approved by:	Directors
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Version Control

Version No.	Revision Date	Description of Changes and Reason	Change Author(s)	Approved by	Date Approved
1.0	01/02/25	Creation , replacing old policy.	Mark Cornish	Board	25/02/2025

1. DEFINITIONS

Word / Term	Definition
TAFC, us, our, or we etc.	Means Tonbridge Angels Football Club Limited, a Community Benefit Society, registered with registered number IPO 32445
Our People	All directors, officials, staff, volunteers, management, players, or contractors as applicable, and working for or engaged by TAFC.

2. PURPOSE AND SCOPE

TAFC is committed to conducting all business in a professional and ethical way and we expect all Our People to maintain the same high standards. The club is committed to developing a culture where it is safe and acceptable for all involved in activities across the club to raise concerns about any unacceptable practice, behaviour, wrongdoing or misconduct. The purpose of this policy is to make clear that club staff can whistle blow without fear of victimisation, subsequent discrimination or disadvantage. This Whistleblowing policy is intended to encourage and enable everyone to raise serious concerns directly to the club. We do not want staff to overlook a problem or seek a resolution outside of the club without first bringing the matter to our attention.

3. OPENESS AND TRANSPARENCY

Our People should aim to work in an open and transparent manner. TAFC understands that occasionally things go wrong, if they do go wrong then we encourage Our People to tell us. This Policy should be seen as an extension of that general principle.

4. WHAT IS WHISTLEBLOWING

Whistleblowing concerns the reporting, or 'blowing the whistle' to sound the alarm about misconduct, illegal or underhand practices by individuals and/or an organisation.

The law provides protection for those who raise legitimate concerns about specified matters, known as qualifying disclosures. A qualifying disclosure is one made in the public interest if an employee has a reasonable belief that one of the following has taken place:

- fraud and/or money laundering.
- a bribe, offered or received.
- a criminal offence.
- a miscarriage of justice.
- an act creating risk to health and safety.
- an act causing damage to the environment.
- breach of any laws, regulations, other legal obligations or The FA Group's policies or procedures; or
- other serious risk that threatens clients, colleagues, the public, the environment, or The FA Group's reputation; and
- concealment of any of the above; is being, has been, or is likely to be committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. Please be aware that you have no responsibility for investigating the matter as it is The FA Group's responsibility to ensure that an investigation takes place.

5. REPORTING PROCEDURE



Our People should report their concerns about misconduct and wrongdoing to their immediate supervisor or manager. If the person feels uncomfortable reporting to their supervisor, they can contact the designated Whistleblowing Officer (details below).

6. CONFIDENTIALITY

All whistleblowing reports will be treated confidentially. The identity of the whistleblower will be protected unless disclosure is required by law.

7. PROTECTION AGAINST RETALIATION

T AFC is committed to protecting whistleblowers from retaliation. Any employee who retaliates against a whistleblower will face disciplinary action.

8. INVESTIGATION PROCEDURE

All reported concerns will be investigated promptly and thoroughly. The Whistleblowing Officer will oversee the investigation and ensure appropriate action is taken. An investigation will generally follow the following steps.

8.1 Acknowledgment of Report

Upon receipt of a whistleblowing report, the Whistleblowing Officer will acknowledge its receipt within five working days. The whistleblower should be informed of the next steps and the estimated timeframe for the investigation.

8.2 Initial Assessment

The Whistleblowing Officer will conduct an initial assessment to determine the validity and seriousness of the report. This may involve a preliminary review of the facts and circumstances surrounding the concern. If the report is deemed to warrant further investigation, the whistleblower will be notified.

8.3 Investigation Process

The investigation should be conducted promptly, thoroughly, and fairly. The investigation team will:

- Gather and review relevant documents, records, and other evidence.
- Interview witnesses and individuals involved.
- Maintain confidentiality and protect the identity of the whistleblower and other parties involved, except as required by law.
- Document all findings, conclusions, and actions taken.

8.5 Interim Measures

If necessary, interim measures may be taken to mitigate any immediate risks or prevent further wrongdoing. This may include temporarily suspending individuals involved, securing relevant documents, or implementing additional controls.

8.6 Reporting Findings

Upon completion of the investigation, the investigation team will prepare a detailed report outlining their findings, conclusions, and recommended actions. The report will be submitted to the Whistleblowing Officer and, where appropriate, to senior management or the board of directors.

8.7 Communication with Whistleblower

The whistleblower will be kept informed of the progress and outcome of the investigation, subject to legal and confidentiality considerations. The whistleblower will be notified of any actions taken as a result of the investigation.

8.8 Follow-up and Remediation

If the investigation identifies wrongdoing or malpractice, the company will take appropriate corrective and remedial actions. This may include disciplinary action, process improvements, or other measures to prevent recurrence.

9. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

Whistleblowing in a safeguarding context means raising concerns over misconduct or malpractice in respect of wrongdoing towards children or vulnerable adults. Concerns can be raised via the Whistleblowing Policy, but may be addressed in conjunction with the Safeguarding Policy if safeguarding concerns are apparent from any Whistleblowing concern. Please refer to TAFC's Safeguarding Policy for further information about this.

10. BREACHES OF THIS POLICY

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our disciplinary procedures. Serious cases of deliberate discrimination may amount to gross misconduct, and potentially dismissal.

11. ROLES AND RESPONSIBILITIES

All Our People are expected to know and understand the content of this Policy and abide by and promote the rules and principles it contains.

This Whistleblowing Policy is fully supported by senior management. The Directors and senior management are primarily responsible for designing, implementing, overseeing, and controlling the systems, controls, and arrangements in place in relation to this Policy. The Policy is controlled by the Directors, and subject to review and amendment by them from time to time.

12. RECORD KEEPING

All records related to the whistleblowing report, investigation, and outcome will be securely maintained by the Whistleblowing Officer for a specified period, in compliance with legal and regulatory requirements.

Information about whistleblowing complaints may be placed on personnel files, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

13. USEFUL CONTACTS

Public Concern at Work (an independent whistleblowing charity and information helpline)

Address: CAN Mezzanine, 7 - 14 Great Dover Street. London. SE1 4YR. United Kingdom.

Web www.pcaw.org.uk

Tel +44(0)020 3117 2520

Email whistle@pcaw.org.uk

Whistleblowing Officer: Mark Cornish, Director.

Tel 07535264283. Email: mark.cornish@tonbridgeangels.co.uk

For Safeguarding concerns:

Club Welfare Officer: Charlie Cole

Tel: 07825 702412. Email: tonbridgeangelsclubsecretary@gmail.com

National League DSO: Martyn Cannon

Tel: 07842 429798. Email: Safeguarding@thenationalleague.org.uk

County FA DSO: Lucy Kidd

Tel: 01622 791850. Email: safeguarding@KentFA.com

FA Safeguarding Team

Tel: 0800 169 1863. Email Address: Safeguarding@theFA.com