



Grimsby Town Football Club, Foundation and Academy
Whistle Blowing Policy

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Author Name and E-mail:	Vikki Harries vikki@gtfc.co.uk
Co-Author Name and Email	
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Grimsby Town Football Club (GTFC) and Grimsby Town Foundation (GTF) including its Academy has a culture of openness and accountability and this policy is intended to encourage staff to report any concerns or suspected wrongdoing as soon as possible, to provide guidance as to how to raise those concerns and to reassure staff that they can raise genuine concerns in good faith without fear of reprisals.

1 Introduction

GTF, GTFC and its Academy are committed to conducting our business with honesty and integrity and we expect all Staff and volunteers to maintain the same high standards. It is always possible, however, for things to go wrong or for organisations to unknowingly harbour illegal or unethical conduct. This Club has a culture of openness and accountability, and this policy is intended to encourage staff to report any concerns or suspected wrongdoing as soon as possible, to provide guidance as to how to raise those concerns and to reassure staff that they are able to raise genuine concerns in good faith without fear of reprisals.

Although disclosure may be made to certain public authorities, the Club's policy is that disclosures should be made in the first instance to the Football Club as set out in section 6 below of this policy

We strongly recommend that you seek advice from the Chief Executive of the football club before reporting a concern to anyone external. However, individuals are entitled to blow the whistle to a prescribed person rather than their employer or with the organisation in which the concern exists. The Department for Business, Energy and Industrial Strategy produce a list of the prescribed persons and bodies who you can make a disclosure to which can be found on their website

<https://www.gov.uk/government/publications/blowing-the-whistlelistof-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>.

1.1 Purpose

This policy sets out how individuals can raise concerns about safeguarding, health, safety and wellbeing within the organisation, whether related to players, other employees, apprentices, children, young people, Adults at Risk who participate or engage in any services and activities conducted under the name of GTFC/GTF. It will provide a method of raising concerns and will detail how feedback may be received in relation to any action(s) taken.

GTFC and GTF will aim to ensure that individuals:

- Get a response to their concerns.
- Are made aware of how to pursue the concern further if they are not satisfied with the response.
- Are reassured that individual will be protected from reprisals or victimisation for whistleblowing in good faith.

1.2 Scope

This policy applies to all staff, players, apprentices, agency workers, contractors, consultants, volunteers, and officials engaged by Grimsby Town Football Club, including its Academy.

Grimsby Town Football Club and Grimsby Town Foundation is covered by this policy.

2 Policy Statement

Players, coaches, other employees, volunteers, officials, parents and / or team followers are often the first to recognise concerns which potentially compromise the welfare or safety of those engaged in our activities of any age and those employed by the Club including players and apprentices.

However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation.

In these circumstances it may be easier for them to ignore the concern rather than report what may just be a suspicion of poor practice. GTFC and GTF would urge anyone to come forward and voice those concerns. If you have safeguarding, health, safety or wellbeing concerns, doing nothing is never an option.

This policy details how individuals can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable individuals to raise serious concerns within the Club and Foundation including its Academy rather than overlooking a problem or blowing the whistle outside. It is in the interests of all concerned that disclosures of potential abuse or concerns are responded to and managed appropriately and without delay.

3 Protection

GTFC, GTF and its Academy realise that raising a concern and reporting allegations is often difficult to do through fear of reprisals from those responsible for the alleged poor practice. This policy is designed to offer protection over and above that which is required by law, as it not only covers employees but anyone who raises a concern provided the disclosure is made:

- In good faith
- If the individual believes what they say to be true, and are not intending / attempting to be malicious, even if the concerns subsequently are proven unfounded

In these circumstances, GTFC and GTF including its Academy will fully support the whistle-blower and will not tolerate any bullying, harassment or victimisation whatsoever. If this does occur any perpetrators will be dealt with under Club's disciplinary procedures (and as a result may face expulsion from the Club).

4 Confidentiality

GTFC, GTF and its Academy will do its utmost to keep confidential the identity of a whistle-blower.

Should any allegations be made through whistleblowing it should be noted that a statement may be needed to form part of the evidence.

Should the whistle-blower need to be identified for any reason or it becomes apparent that the whistle-blower will be identified because of any subsequent investigation, notice will be given to the whistle-blower, by a representative of the Club (usually the Club's Designated Safeguarding Officer) so that an opportunity is provided to discuss any likely consequences and support required.

5 Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible and more difficult to investigate effectively, but they may be considered at the discretion of the Club. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised, and any potential safeguarding risks indicated
- The credibility of the concern
- The likelihood of confirming or clarifying the allegation from attributable sources
- Statutory agency advice e.g., LADO, Children's Social Care or the Police

If anybody feels unable to disclose their identity this policy seeks to encourage them to report any safeguarding concern in good faith and through external agencies such as:

- NSPCC Helpline (0800 800 5000) if necessary. Contact details for local statutory agencies and the Local Authority Designated Officer (LADO) are set out in the Club's Safeguarding and Child Protection Policy.
- The NSPCC Helpline for Whistleblowing can be contacted for support and advice by telephone (T: 0800 028 0285) or email (help@nspcc.org.uk)

6 Raising a Concern or Making an Allegation

Anyone wishing to raise a concern should do so either verbally or in writing to the Club's Designated Safeguarding Officer. The concern needs to be as specific as possible including any names, dates and locations (where possible).

The Club's Designated Safeguarding Officer, Vikki Harries can be contacted either by phone 07498926776 or through email: safeguarding@gtfc.co.uk

If the concern is related to a health and safety matter, or an employment matter - the concern should still be raised with the safeguarding office who will then speak to the either the HR Representative or Chief Executive Officer to review and determine whether to investigate.

The Club's Safeguarding Children Policy also provides the names and contact details for external agencies. Should any concerns or allegations be made GTFC and GTF would encourage the whistle-blower to put their name to the allegation. Any anonymous concerns / allegations are much less powerful and are therefore much harder to investigate as outlined above but all concerns shared will be taken seriously and investigated where possible.

If, after the course of an investigation, it has been found that the concerns or allegations are untrue or have not been substantiated then no action will be taken against the whistle-blower. If, however, it is established that they have made malicious allegations disciplinary action may be taken against them.

All investigations will initially be undertaken by the Club's Designated Safeguarding Officer with support where appropriate from and/or external statutory or safeguarding expertise. However, should you feel that you have not received a satisfactory response to your concern you can approach the following people or organisations:

- The Lincolnshire Football Association Welfare Officer Tel: 01522-596583 Mob: 07973666778
- The FA Child Protection Team on 0207 745 4771 or by writing to The FA Case Manager, the Football Association, Wembley Stadium, Wembley, London, HA9 0WS

- EFL Safeguarding Manager: Alexandra Richards Tel: 07792 284740 Email: arichards@efl.com
- The FA / NSPCC Child Protection 24-Hour Helpline 0808 800 5000.
- Or by going directly to the Police and/or Social Services

7 Monitoring and Review

This policy will be reviewed annually, or sooner if required by changes to law, FA / EFL regulation, or statutory safeguarding guidance.

This policy and its contents have been endorsed by the Board of Directors of Grimsby Town Football Club and will be reviewed on an annual basis or sooner if required, due to Government changes or advice from the Football Association on the subject.

P. Bancroft

Signed:

Dated: 22/8/25

(CEO)

V2	03/09/2021	Policy reviewed and updates required included. This policy will replace all other previous versions of the policy.	M. George (DSO)
V3	2/7/22	Policy Review by MG	M. George (DSO)
V4	4/6/23	Policy Review by PM	P MacLeod (DSO)
V5	16/2/23	Policy Review by VH	V.Harries (DSO)
V6	09/08/24	Policy Review PB	P. Bancroft (CEO)
V7	22/08/25	Policy Review by VH	V.Harries (DSO)

