



Whistleblowing

Luton Town Football Club

Approved by: Club Board

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Authorised by:

Jenn Smith, HR Director

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Policy Statement

Luton Town Football Club is committed to conducting its business with honesty and integrity. We expect all staff to uphold high standards. However, we recognise that issues can sometimes arise, including illegal or unethical behaviour. To address such situations effectively, the organisation fosters a culture of openness and accountability.

Purpose & Scope

This policy applies to everyone involved in activities carried out under the jurisdiction of Luton Town Football Club, including its CCO.

The aims of this policy are:

- To encourage individuals to report suspected wrongdoing as soon as possible, with the assurance that their concerns will be taken seriously, investigated appropriately, and treated with confidentiality.
- To provide guidance on how to raise concerns.
- To reassure individuals that they can raise genuine concerns without fear of reprisals, even if their concerns turn out to be mistaken.

Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Organisation is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Qualifying disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the Organisation has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice

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- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Organisation will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Organisation’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, ie it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

Next Steps

In the first instance you should report any concerns you may have to your line manager or to *the next most senior manager* where the concern relates to your line manager or it is not appropriate to make the report to your line manager. All concerns reported will be treated in the utmost confidence.

You may submit your concerns in any format. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

If you do not report your concerns to *Luton Town Football Club* you should take them direct to the appropriate organisation or regulatory body with authority for that area.

Following receipt of a disclosure made under this policy, an investigation meeting will be held. The purpose of this meeting is to gather as much information as possible from you regarding your concerns, including whether you have any supporting evidence or can identify any witnesses.

This meeting will be held as soon a practical following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the

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concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigation manager will write to you confirming the outcome.

If you are not satisfied with the explanation or outcome, you may raise the matter with the next *most senior position* in organisation, or the appropriate official organisation or regulatory body.

Safeguarding

We understand that reporting concerns can be difficult due to fear of retaliation. This policy protects anyone who raises concerns in good faith, believing them to be true, even if they turn out to be unfounded.

Retaliation, bullying, or harassment against whistleblowers will not be tolerated. Any such behaviour will be dealt with under disciplinary procedures.

Raising a Safeguarding Whistleblowing Concern

Concerns should be raised either verbally or in writing with the Designated Senior Safeguarding Manager. Provide as much detail as possible, including names, dates, and locations. Contact details for external agencies for safeguarding concerns are also available.

While we encourage whistleblowers to disclose their identity, anonymous reports will still be taken seriously, though they may be harder to investigate.

A meeting may be arranged within 14 days to discuss the concern. We aim to provide an indication of how the issue will be handled where appropriate.

If an investigation finds that concerns are untrue or unsubstantiated, no action will be taken against the whistleblower. However, malicious or false allegations may result in disciplinary action.

Investigations will be carried out by the Designated Senior Safeguarding Manager or the HR department. Outcomes will be shared as appropriate, respecting confidentiality and legal requirements.

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If a whistleblower feels their concern has not been addressed adequately, they may escalate the issue to an external independent body.

Confidentiality

We encourage openness but will respect confidentiality if requested. If an investigation requires disclosure of an individual's identity, this will be discussed first.

Anonymous disclosures are not encouraged, as they can limit the ability to investigate. Individuals concerned about retaliation may contact the Head of Human Resources to discuss confidentiality measures.

Contact Details

Sarah Bloomer – Head of Safeguarding
Contact Number: 07912 268915
Email: sarah.bloomer@lutontown.co.uk

For external support:

Local Police or Social Care Services:
https://m.luton.gov.uk/Page/Show/Health_and_social_care/safeguarding/safeguarding_children/Pages/Reporting-a-concern-about-an-adult-who-works-with-children.aspx
Child Protection in Sport Unit: <https://thecpsu.org.uk>
NSPCC Helpline: 0808 800 5000 | help@nspcc.org.uk
FA Safeguarding Team: safeguarding@TheFA.com
EFL Safeguarding Team: arichards@efl.com

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