



## SPEAK UP POLICY

### **What is Speak Up?**

In this policy 'Speak Up' means the reporting by employees of suspected misconduct, safeguarding allegations, illegal acts or failure to act within the Foundation. The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Foundation's work to come forward and voice those concerns. Employees are often the first to realise that there may be something seriously wrong within the Foundation. 'Speak Up' is viewed by the Foundation as a positive act that can make a valuable contribution to the Foundations efficiency and long-term success. It is not disloyal to colleagues or the Foundation to speak up. The Foundation is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its practices.

To help achieve these standards it encourages freedom of speech. If you are considering raising a concern you should read this policy first. It explains:

- The type of issues that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern
- What the Foundation will do/ how the matter may be resolved.

### **Scope of this Policy**

This policy is intended to enable those who become aware of wrongdoing in the Foundation affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated and resolved. The Speak Up policy is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures
- If a client has a concern about services provided to him/her, it should be raised as a complaint to the Foundation

### **What is the aim of the Policy and when does it apply?**

The policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the Foundation without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable you to raise serious concerns within the Foundation rather than ignoring a problem.

### **This Policy aims to:**

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- Provide avenues for you to raise those concerns and receive feedback on any action taken
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.



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### **Who can raise a concern under this Policy?**

- Employees and volunteers of the Foundation including the Board of Trustees.
- Those providing services under a contract or other agreement with the Foundation

### **What should be reported?**

Any serious concerns that you have about service provision or the conduct of officers or members of the Foundation or others acting on behalf of the Foundation that may include:

- Bullying and Harassment.
- Criminal activity.
- Failure to comply with any legal obligation.
- Miscarriages of justice.
- A danger to the health and safety of any individual (including safeguarding).
- Damage to the environment.
- Bribery.
- Financial fraud or mismanagement.
- Breach of our internal policies and procedures.
- Conduct likely to damage our reputation or our financial wellbeing.
- Unauthorised disclosure of confidential information.
- Negligence.
- The deliberate concealment of any of the above matters.

### **Protecting the Individual (Your legal rights)**

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest. The Act makes it unlawful for the Foundation to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act. Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. The Foundation cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

### **Harassment or Victimisation**

The Foundation is committed to good practice and high standards and to being supportive of you as an employee. The Foundation recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service. The Foundation will not tolerate any harassment or victimisation of the Individual (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary procedure if relating to a staff member.

Support to you throughout this process:

- You will be given full support from senior management.
- Your concerns will be taken seriously.
- The Foundation will do all it can to help you throughout the investigation.



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### Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

### Anonymous Allegations

This policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously. Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Foundation. In exercising this discretion, the factors to be taken into account would include:

- The seriousness of the issue raised
- The credibility of the concern.
- The likelihood of confirming the allegation from other sources.

### Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Foundation will recognise your concern and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action (staff only), may be taken.

### Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns with:

- Your line manager or a member of the senior leadership team.
- Should the concern relate to a safeguarding concern you should contact the Designated Safeguarding Officer.
- Should the concern regard the Designated Safeguarding Officer you should contact the Senior Safeguarding Manager or Chief Executive Officer.
- Should the concern be about the Foundation Chief Executive Officer your concern should be raised with the Chairman of the Foundation Board of Trustees who will decide how the investigation will proceed. This may include external investigation.

### Designated Safeguarding Officer contact details:

Name	Role	Email	Telephone Number
Tom Smith	Lead Safeguarding Trustee	thomas.smith@canaries.co.uk	N/A
Gavin Coe	Senior Safeguarding Manager	gavin.coe@norwichchitycsf.org.uk	07468 417561



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Lacie Pammen	Designated Safeguarding Officer	lacie.pammen@norwichcitycsf.org.uk	07799 141873
Claire Pullen	Designated Safeguarding Officer	claire.pullen@norwichcitycsf.org.uk	07468 417495
Lewis Plowman	Designated Safeguarding Officer	lewis.plowman@norwichcitycsf.org.uk	01603 761122
Lauren Jordan	Designated Safeguarding Officer	lauren.jordan@norwichcitycsf.org.uk	01603 761122

### How to raise a concern

You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- The nature of your concern and why you believe it to be true.
- The background and history of the concern (giving relevant dates).

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within the Foundation and there are reasonable grounds for your concern. You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

### What the Foundation will do

The Foundation will respond to your concerns as quickly as possible. Do not forget that testing your concerns is not the same as either accepting or rejecting them. The overriding principle for the Foundation will be the safety of the participants. In order to be fair to all, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately.

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- Acknowledging that the concern has been received
- Indicating how the Foundation proposes to deal with the matter
- Supplying you with information on support mechanisms
- Telling you whether further investigations will take place and if not, why not.
- All Safeguarding concerns will be recorded confidentially on My Concern for accountability.



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The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood. Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or a friend may accompany you in support. The Foundation will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, the Foundation will arrange for you to receive appropriate advice and support. You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

Protection of others is paramount in all cases. Where appropriate, the matters raised may:

- Be investigated by management, internal audit, or through the disciplinary/grievance process.
- Be referred to the police.
- Be referred to the external auditor.
- Be referred to the EFL/ Premier League/ FA.
- Be referred and put through established child protection/abuse procedures.
- Form the subject of an independent inquiry

Staff will not investigate these matters. We will seek and work with the advice that is provided. Should an allegation be made against a Designated Safeguarding Officer or Senior Safeguarding Manager, a nominated Designated Safeguarding Officer or the Club's Head of Safeguarding will raise the concern to the LADO.

There are sensible steps that every adult should take in their daily professional conduct with children. This can be found in the NSCP Safer Programme Safer Working Practice (this guidance is on the NSCP website and also included in our procedures).

### **What to do if you are not happy with the outcome?**

If following an investigation, you do not feel the internal procedures met your expectations there is an opportunity to raise a concern externally by contacting one of the following:

- The FA
- EFL Trust
- Premier League



**COMMUNITY SPORTS  
FOUNDATION**

## **SPEAK UP POLICY**

### **Associated Policies**

Grievance policy

Disciplinary policy

Customer Terms and Conditions

### **Policy Review**

Policy Issue Date **April 2021**

Date of Next Update **April 2022**

All safeguarding policies and procedures are due for a general review on the above date. They may however be reviewed and updated earlier, in the event of a change in Foundation requirements, or relevant legislation.