

# Whistleblowing Policy

## Document Summary

It is important that any misconduct or wrongdoing by staff or others working on behalf of Coach Core Foundation is reported and properly dealt with. Coach Core Foundation therefore requires all individuals to raise any concerns that they may have about the conduct of others in the charity, or within the wider Coach Core Foundation network. This policy provides guidance on how to report a disclosure regarding wrongdoing in line with the Public Interest Disclosure Act 1998, and guidance on how these concerns will be dealt with.

We ask that any individual wishing to raise a concern or complaint, please read the policy in full before undertaking the process laid out in Section 6.

The incident report form can be found on our website [HERE](#)

Date of original policy	April 2020
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Policy review date	November 2026
Accountable person	Chief Executive Officer
Policy Author	Chief Executive Officer

You can also access our [Safeguarding Policy](#) at any time.

### **Important note:**

The SharePoint version of this document is the only version that is maintained. Any printed copies should therefore be viewed as “uncontrolled” and, as such, may not necessarily contain the latest updates and amendments.

### **Contact us:**

[info@coachcore.org.uk](mailto:info@coachcore.org.uk)

Chief Executive	<a href="mailto:Gary.laybourne@coachcore.org.uk">Gary.laybourne@coachcore.org.uk</a>
Independent Safeguarding Trustee	<a href="#">Phil Newman</a>
Chairman	<a href="#">Edward Wray</a>

## I. INTRODUCTION

Coach Core Foundation is committed to the highest possible standards of openness, probity, and accountability. The purpose of this policy and procedure is to outline ways in which all staff, others working for/connected to Coach Core or a member of the public can express concerns about wrongdoing; encourage them to raise concerns at an early stage; and in an appropriate way in line with the [Public Interest Disclosure Act 1998](#) (Section 4.2).

If any individual, at any time, has a concern or wishes to report an incident, we want them to be able to do so, safe in the knowledge that it will be actioned quickly and effectively.

We actively encourage the involvement of others if a serious incident is reported, including (but not limited to) the police, the charities commission and the local safeguarding units.

**Our role, as a charity, is to better the lives of the people it works with, including those who work for/with us, and if incidents, protocol and/or conduct of others places that at risk, we want to know about it.**

## 2. WHO DOES THIS POLICY APPLY TO?

This policy applies to:

- All Coach Core Foundation staff including permanent, temporary, agency, consultants, contractors, and volunteers (including the charity's trustees).
- Our partners, including our training partners, Active Partnerships/Central Partners and employers of each Coach Core programme consortium.
- Our apprentices and the individuals around them (schools, mentors, parents, etc)
- Our supporters – funders, pro bono individuals/organisations, etc.
- The general public.

Essentially, should any individual have concerns about the management of the programme, or treatment of Coach Core apprentices, they have a right to report this.

## 3. AIMS

**3.1** The Whistleblowing Policy is intended to cover serious public interest concerns that fall outside the scope of other procedures. Any matters not covered by the Act, or therefore this policy, will be dealt with by using the Disciplinary, Grievance or Bullying and Harassment policies and procedures (as appropriate).

**3.2** The aim of the procedure is to ensure that an appropriate process exists which supports the resolution of matters raised, in response to any disclosure of wrongdoing or irregularity and in a manner, which is fair, expedient and discreet.

## 4. DEFINITIONS

**4.1 Whistleblowing:** Where someone believes there is wrongdoing in their workplace and/or connected to negative incidents or environments that are taking place under the Coach Core name; reports it by following correct processes and where employment rights are protected. Otherwise known as 'making a disclosure in the public interest'.

**4.2 The Public Interest Disclosure Act 1998** cite examples that are in the reasonable belief of the individual, either happening now, have happened, or are likely to happen:

- conduct which is an offence or a breach of law, e.g., fraud, corruption or theft.
- a breach of a legal obligation
- disclosures related to miscarriages of justice.
- a danger to the health and safety of any individual
- risk or actual damage to the environment
- deliberate attempt to conceal any of the above
- actions which are unprofessional, inappropriate or conflict with general understanding of what is right or wrong.

This list is not exhaustive and there may be other serious public interest concerns which would come under this Policy.

**4.3** For this policy, whistleblowing may also include the reporting of suspected malpractice, wrongdoing, or dangers in relation to Coach Core's fundraising activities. This may include criminal offences, breach of any legal or professional obligation, breach of the Fundraising Code of Practice or deliberately concealing any of the above.

**4.4** Safeguarding our apprentices, our staff, our partners and those connected to the charity in multiple ways, plays a major part in our governance and operations. The charity has a specific safeguarding policy that can be found on its website outlining our ongoing commitment to the protection and safety of these individuals.

## 5. ROLES AND RESPONSIBILITIES

### 5.1 Coach Core Foundation- Chief Executive

The Chief Executive is the nominated board sponsor for the Whistleblowing Policy and Procedure across Coach Core Foundation, ensuring that all disclosures are dealt with fairly, thoroughly and in accordance with the policy.

### 5.2 Coach Core Foundation- Programme Managers

All Programme Managers are responsible for ensuring that project staff are aware of the policy and its application, and for creating an environment in which staff can report disclosures freely and without fear of reprisal. Programme Managers are also responsible for ensuring external partners, such as Active Partnerships/administrative partners and employer partners, are aware of this Policy and feel comfortable reporting disclosures if needed.

### 5.3 Coach Core Foundation- additional staff and volunteers

Each member of staff has a responsibility to report a disclosure providing s/he has a reasonable belief that malpractice and/or wrongdoing has occurred. This policy is distributed as standard to all new joiners, regardless of their position or contract.

### 5.5 Coach Core Programme- Employers

Each employer partner is responsible for reporting a disclosure should they have reasonable belief that malpractice and/or wrongdoing has occurred within another employer partner of the consortium. This disclosure should be reported, in the first instance, to the relevant Coach Core Programme Manager (Employment Coach).

### 5.6 Coach Core Programme- Learning Coaches

Each Coach Core Learning Coach is responsible for reporting a disclosure should they have reasonable belief that malpractice and/or wrongdoing has occurred within an employer partner of the consortium. This disclosure should be reported, in the first instance, in line with the guidance provided by the training providers' internal Whistleblowing Policy. The disclosure should also be reported to the relevant Coach Core Programme Manager (Employment Coach).

### 5.7 Coach Core Programme- Apprentices

In the first instance, Coach Core apprentices should refer to the policies and procedures of their individual employer should they have a whistleblowing concern. However, apprentices should also be made aware that they can report a disclosure to their Coach Core Learning Coach or Programme Manager (Employment Coach).

### 5.8 Coach Core supporters

Individuals/organisations that support the work of the charity through donations, funding and/or pro bono work. As individuals with a vested interest in the operations and conduct of the charity, we actively engage with them and encourage them to feedback on our performance at all times.

### 5.9 The general public

Coach Core programmes operate largely in a public setting; community clubs, schools, events, training courses, 1:1 coaching/physical training, etc. Our staff, and those others outlined above, also interact with our groups and operate under the charity's brand in these settings also. Whilst doing so, an external individual may have cause for concern and has a moral duty to report any incidents or poor conduct they witness.

## 6. HOW TO REPORT A DISCLOSURE

In the interests of clarity, the term **'whistleblower'** herein refers to a staff member, volunteer, contractor or external individual (inclusive of those outlined in Section 5) that is raising the concern and/or making the disclosure.

When a disclosure has been reported, the need for confidentiality will be respected wherever possible, although any disclosure raised under this procedure will need to be properly documented.

We ask that any potential whistleblower please use the **INCIDENT REPORT FORM** but we do of course process any emails, calls and/or social media messages in the same manner.

### Internal reports

**6.1** As a first step, any disclosures related to Coach Core Foundation staff/those connected to the charity, should be raised internally with the whistleblower's immediate manager or key point of contact. If disclosed by an external individual, this should be handled by, or reported to, the management team. Disclosures can be raised verbally or in writing. Whistleblower's that

are disclosing concerns internally may be accompanied at this stage by a work colleague for support, providing that that person is not involved in the disclosure or investigation.

- 6.2** Any disclosure made to the line manager/point of contact will be treated in the strictest confidence. It will not result in a report to anyone within Coach Core Foundation without the whistleblowers agreement, except where the line manager/point of contact believes that the issues raised are so serious that further action may be required. Where this is the case, the line manager will refer it immediately to the Chief Executive Officer.
- 6.3** If a whistleblower feels it is inappropriate to report a disclosure with their line manager/point of contact in the first instance (for example if their concerns are about that individual's actions or if they are so serious that they should be escalated to someone at a more senior level), then they should speak to the Chief Executive Officer. All such approaches will be treated in the strictest confidence.
- 6.4** If the whistleblower remains unhappy about the speed, or conduct of any further action taken, or the way in which their disclosure has been resolved, they should refer the matter to the Safeguarding Trustee or Chairman of the Board of Trustees.
- 6.5** If the whistleblower feels it is inappropriate to report a disclosure directly with anyone who is part of the day-to-day management of Coach Core Foundation, then they can write to the nominated Safeguarding Trustee or Chairman of the Board of Trustees marking the envelope Private and Confidential. The envelope will then be forwarded unopened, and the approach will be treated in the strictest confidence. The nominated Trustee or Chairman will then appoint the most appropriate board member to investigate. A whistleblower must not approach individuals involved in their disclosure directly or attempt to investigate the matter personally.
- 6.6** Whistleblowers are urged to exhaust the internal processes set out above but, in exceptional or urgent circumstances, it might be appropriate for them to contact an external person or body. A full list of persons/bodies can be found in [The Public Interest Disclosure \(Prescribed Persons\) Order 1999](#) which sets out the full prescribed persons list and a description of the matters to which issues of concern could be referred.
- 6.7** If Coach Core Foundation whistleblowers have concerns about Coach Core's fundraising practices that haven't been resolved, they may wish to raise this with the Fundraising Regulator, by emailing [admin@fundraisingregulator.org.uk](mailto:admin@fundraisingregulator.org.uk) or calling 0300 999 3407 (Mon-Fri, 09.30 am-4.30 pm).
- 6.8** If, at any stage in the procedures, whistleblowers are unsure about what to do and would like independent advice, they can discuss their concerns with someone at Protect. This body is an independent Charity staffed by lawyers, which offers confidential free legal and practical advice on how people can raise concerns about malpractice at work. Protect can be contacted at: [www.protect-advice.org.uk](http://www.protect-advice.org.uk) or by phone on 020 3117 2520.
- Individual Coach Core employers can also discuss their concerns with the above body, should they require independent advice.
- 6.9** If you are unhappy with any of the process or still have serious concerns, you would be welcome to [contact the Charity Commission](#) directly.

## External reports

- 7.1** The charity will aim to respond to all reports within 24 hours and put in place the necessary owner and actions internally to investigate any reports.
- 7.2** As per Section 6; we respect the privacy of any whistleblower but where there is risk of serious harm, particularly to a child or where a crime is being reported, CCF reserves the right to take this to the relevant authorities. For further details on how CCF processes a disclosure, please see Section 6 of our safeguarding policy.
- 7.3** Once the investigation is complete, we will notify the whistleblower, sharing any details we deem appropriate. The whistleblower, and their report, will be protected even once the process has been completed and regardless of outcome.
- 7.4** If a whistleblower is unhappy with the process and/or the outcome; please refer to Section 6.4 – 6.9.

Coach Core Foundation will not tolerate any whistleblower/s being subjected to any form or victimisation or detriment because of their decision to make a disclosure in good faith. If any whistleblower believes that they have been subject to a detriment by anyone within Coach Core Foundation for this reason, they must inform the Chief Executive or nominated Trustee/Chairman of the Board of Trustees immediately and appropriate action will be taken to protect them from any reprisals. External bodies are also published above if required too.

## 8 TRAINING

There is no mandatory training associated with this policy. Coach Core staff, its apprentices and those involved with the running of the charity do undergo the necessary safeguarding training to proactively manage risks before they happen. For more information on this, please see Section 4 of our [Safeguarding Policy](#).

## 9 POLICY REVIEW

This policy will be reviewed formally every two to three years but updated as and when appropriate and/or in line with key Government / Charity Commission guidance.

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