



Whistleblowing Policy

Effective Date of Policy: 10/10/2025

Policy Owner/Lead: Head of Safeguarding and Welfare

Review Date: September 2026

Introduction

This Whistleblowing Policy (the “**Policy**”) enables the Tottenham Hotspur Football and Athletic Co. Limited (trading as “**Tottenham Hotspur Football Club**”), its Group Companies, Tottenham Hotspur Foundation (a registered charity known as the “**Foundation**”) and Tottenham Hotspur Women Football Club Limited – together the “**Club**” to:

- encourage Staff members to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- provide Staff members with guidance as to how to raise those concerns; and
- reassure Staff members that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This Policy applies to any person acting for or on behalf of the Club in an official role whether as an employee, volunteer, casual worker, consultant, contractor, or otherwise, including officers, shareholders and stakeholders of the Club (the “**Staff**”).

The Club is committed to conducting its business with honesty and integrity, and we expect all Staff members to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them if they do occur.

The Club has a duty to identify such situations and take the appropriate measures to remedy the situation. The Club is committed to the highest standards of transparency, integrity and accountability and encourages a culture of openness to help prevent occurrences of malpractice.

This Policy does not form part of any contract of employment, agreement or other contract to provide services, and we may amend it at any time.



What is Whistleblowing?

A “**Whistleblower**” is a person who raises a genuine concern relating to any of the qualifying disclosures below. If any Staff member has any genuine concerns related to suspected wrongdoing or danger affecting any of the Club’s activities, they should report it under this Policy.

It is understandable that Staff members may be concerned that by reporting such issues as they may be opening themselves up to detrimental treatment or risking their job security. However, all Staff members at the Club are entitled to statutory protection if they raise concerns in the right way.

The law provides protection for workers who raise legitimate concerns about specified matters. These are called “**Qualifying Disclosures**”. A Qualifying Disclosure is one made in good faith by a Staff member who has a reasonable belief that any of the below has taken place:

- a criminal offence, including but not limited to bribery, tax evasion, fraud; a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation, including failure to comply with any legal or professional obligation or regulatory requirement, unauthorised disclosure of confidential information, poor practice in positions of trust and/or breaches of the Club’s policies; and/or
- concealment of any of the above.

In order for the concern to be a Qualifying Disclosure there must be a disclosure of information and the Staff member must believe that the disclosure is made in the public interest. In the public interest means it must affect others, for example, other workers, customers or the general public.

It is not necessary for the Staff member to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient.

This Policy should not be used for complaints relating to the personal circumstances of individual Staff member, such as the way they have been treated at work. In those cases, the Staff member should use the Club’s Grievance Policy, Anti-harassment and Bullying Policy or other relevant Club policy as appropriate.

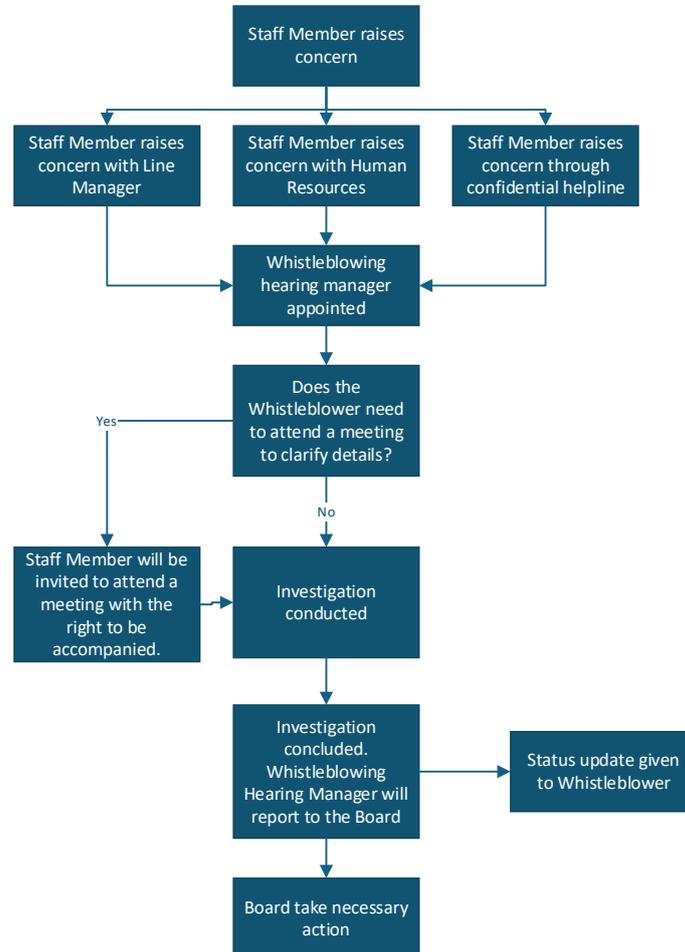
If a complaint relates to personal circumstances but there are also wider concerns (for example, a breach of the Club’s internal policies), the Staff member should discuss with their Line Manager, Head of Safeguarding and Welfare, Director of Legal or the Chief People Officer, as appropriate.

If a Staff member is uncertain whether something is within the scope of this Policy, they should seek advice from the HR department or a member of the Legal team.



Raising a Whistleblowing Concern

The below steps are designed to ensure any whistleblowing concern is dealt with in a fair, timely and consistent manner.



Raising Whistleblowing Concern to Immediate Manager

If a Staff member has a genuine concern relating to any type of wrongdoing that is covered under this Policy, they should raise it with their Line Manager. If a whistleblowing concern is raised to a Line Manager, they should inform the HR department of this concern.

If the concern relates to a Staff member's Line Manager, or for any reason a Staff member does not wish to approach their Line Manager, the concern should be raised with a member of the HR Department or Safeguarding Team. Staff members can raise their concern verbally, or in writing/email.

The Club hopes that in many cases any concerns will be able to be raised with your Line Manager or the HR Department as it may be possible to agree a way of resolving the concern quickly and effectively. In some cases, your Line Manager may refer the matter to the Head of Safeguarding and Welfare or the Chief People Officer.



The Club also has an external and independent whistleblowing hotline. This can be used if the person reporting does not want to speak with their line manager, HR team or Safeguarding team. The hotline is managed by an independent third party, Safecall, and Staff members can raise concerns either anonymously, semi-anonymously or on a named basis. Safecall can be contacted on 0800 9151571 or via www.safecall.co.uk/clients/tottenham-hotspur-football-club/

It is important that the Whistleblower sets out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- what action (if any) the Staff member is seeking.

The Club will ensure that all communications are available in an accessible format where required.

Investigation

If the whistleblowing concern was raised to the line manager, the line manager will carry out an initial assessment to determine the scope of any investigation. Where the whistleblowing was through Safecall, information will be reviewed, assessed and actioned appropriately. Information will be escalated to the appropriate Team or Manager or where necessary to the Chief People Officer, Strategic Safeguarding Lead or Board depending on the type of concern and who/where it relates to. A **“Whistleblowing Hearing Officer”** will be appointed and will carry out an investigation. The Whistleblowing Hearing Officer may be the Line Manager, a member of the HR or Safeguarding team or an appropriate Manager. A member of the HR team may support the Whistleblowing Hearing Officer, if appropriate.

In some cases, it may be necessary for the Club to require the Whistleblower to attend a meeting to clarify the nature of their concern. This will be arranged as soon as possible. Where the Whistleblower is asked to attend a meeting, a member of the HR Department may also be present at such meeting, if appropriate.

The Whistleblower may bring a colleague or trade union representative to any meetings under this Policy, but any companion must respect the confidentiality of the disclosure and any subsequent investigation. The level of investigation and timescales will vary depending on the nature of the suspected wrongdoing.

The whistleblowing hearing officer investigation will then report to the Board, which will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency.

The Club will aim to keep any Whistleblower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Club from giving the Whistleblower specific details of the investigation, an outcome or any disciplinary action taken as a result. The Whistleblower should treat any information about the investigation as confidential.

If the Club conclude that a Whistleblower has made false allegations maliciously, the Whistleblower may be subject to disciplinary action.

The Appeal

While the Club cannot always guarantee the outcome you are seeking, the Club will try to deal with all concerns fairly and in an appropriate way.



If the Whistleblower is not happy with the way in which the concern has been handled, the Whistleblower should appeal to the HR department, or where necessary to the Chief People Officer, Director of Legal, Strategic Safeguarding Lead or Board depending on the type of concern and who/where it relates to. The Whistleblower should raise any appeal, in writing within five (5) days of any outcome/feedback being delivered. It is important that the Whistleblower clearly sets out the grounds of their appeal, i.e. the basis on which their original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask the Whistleblower to attend a meeting to clarify the nature of the appeal. This will be arranged as soon as possible. Where it is considered appropriate, a member of the HR Department may also be present, if appropriate.

If, on conclusion of the above process, the Whistleblower reasonably believes that the appropriate action has not been taken, they should report the matter an external authority/body. The Club strongly encourages any Whistleblower to seek advice before reporting a concern to anyone external. If you are unsure about whether to raise a concern or how to do so, you may seek confidential advice from Protect, the UK's independent whistleblowing charity. Protect operates a free and confidential helpline, offering guidance to individuals considering making a whistleblowing disclosure.

You can contact Protect via:

- **Website:** www.protect-advice.org.uk
- **Helpline:** 020 3117 2520
- **Email:** whistle@protect-advice.org.uk

Speaking to Protect does not mean you are making a formal disclosure, and they can help you understand your options before taking any further steps.

Confidentiality

The Club hopes that Staff members will feel able to voice whistleblowing concerns openly under this Policy. However, if Staff members want to raise your concern confidentially, we will make every effort to keep their identity secret. The Club has a confidential helpline which supports Staff members being able to report anonymously. If it is necessary for anyone investigating the concern to know the identity of the Whistleblower, this will be discussed with the Whistleblower.

The Club do not encourage Staff members to make disclosures anonymously, although we will make every effort to investigate anonymous disclosures. Staff members should be aware that proper investigation may be more difficult or impossible if the Club cannot obtain further information. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals of their identity being revealed should come forward to the Head of Safeguarding and Welfare, the Chief People Officer, or Director of Legal and appropriate measures can then be taken to preserve confidentiality.

Confidentiality is an important part of the procedures provided under this Policy. Details of the investigation and the names of the person making the complaint and the person accused will only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action in line with the Club's Disciplinary Policy.

If a Staff member is in any doubt, they can seek advice from Protect or the Club's Employee Assistance Programme.



Protection and Support for Whistleblowers

It is understandable that Whistleblowers are sometimes worried about possible repercussions. The Club aims to encourage openness and will support Staff members who raise genuine concerns under this Policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a Staff member believes that they have suffered any such treatment, they should inform their Line Manager, the Chief People Officer or the Head of Safeguarding and Welfare. If the matter is not resolved, it should be raised formally using the Club's Grievance Policy.

Staff members must not threaten or retaliate against Whistleblowers in any way. If any Staff members are involved in such conduct, they may be subject to disciplinary action in accordance with the Club's Disciplinary Policy. In some cases, the Whistleblower may have a right to bring a claim for compensation against individuals personally in an employment tribunal.

A confidential support and counselling hotline is available to Whistleblowers who raise concerns under this Policy.

Reporting Routes

Who?	Why?	How?
Line Manager	Where possible your line manager should be your first point of contact to discuss your	Verbally or in writing
HR Department Safeguarding Team	If the concern is about your line manager or you are not comfortable discussing the concern with them, you can speak with HR or Safeguarding personnel. If the concern relates to HR or Safeguarding or Club-wide malpractice, Safecall can escalate see below.	Verbally or by email HR@tottenhamhotspur.com Safeguarding@tottenhamhotspur.com Chief People Officer: Angela.cardani-liggett@tottenhamhotspur.com Director of Legal: Katie.Reed@tottenhamhotspur.com
Safecall	This route can be used for independent oversight or if you wish to remain anonymous. If the concern relates to HR or Safeguarding or Club-wide malpractice, Safecall can escalate to the Chief People Officer, Director of Legal, Strategic Safeguarding Lead or Board member as appropriate.	0800 915157 www.safecall.co.uk/clients/tottenham-hotspur-football-club/