

Whistleblowing Policy



1. Purpose

This policy sets out how the Charity encourages and enables staff to raise serious concerns about wrongdoing in a safe, responsible and effective way. It aims to ensure that concerns are addressed promptly and appropriately, while protecting individuals who raise concerns in good faith.

2. Scope

This policy applies to all individuals involved in the Charity, including:

- employees (permanent, fixed-term and casual)
- agency workers, contractors and consultants
- volunteers and trustees

3. Legal framework

This policy is informed by the Public Interest Disclosure Act 1998 (PIDA) and relevant employment legislation. Anyone who make a qualifying disclosure in the public interest are legally protected from detriment or dismissal.

4. What is whistleblowing?

Whistleblowing is the disclosure of information someone reasonably believes shows wrongdoing or malpractice. This may include:

- safeguarding failures including the abuse or neglect of the people who use the Charity's services
- risks to health and safety
- criminal activity, fraud, misuse of charitable funds or assets or financial mismanagement
- breaches of legal or regulatory obligations
- deliberate concealment of any of the above

This policy is not intended to cover grievances by employees (which should be raised under the Grievance Policy) or individual complaints (which should be raised under the Complaints Policy).

Safeguarding concerns must always be addressed in accordance with the relevant Safeguarding Policy, even where they are raised via whistleblowing.

5. Whistleblowing and safeguarding

Any concerns relating to safeguarding, abuse or neglect must be treated as urgent and managed in line with the Charity's Safeguarding Policies.

This Whistleblowing Policy should be read alongside the Safeguarding Policies, which set out detailed procedures for:

- recognising and responding to safeguarding concerns
- reporting concerns internally and externally
- escalation to statutory agencies
- roles and responsibilities for safeguarding

Where appropriate, the Charity will make referrals to other relevant external bodies, including local authorities, the Charity Commission or the police.

6. Raising a concern

Concerns should be raised as soon as possible. Anyone with a concern is encouraged to raise it internally in the first instance. Concerns may be raised with the Operations Manager, Artistic Director and the Chair of, or any other, Trustee.

Concerns may be raised verbally or in writing and should include, where possible:

- the nature of the concern
- relevant dates, times and locations
- any evidence available

Anonymous disclosures will be considered but may be harder to investigate.

7. Confidentiality

The Charity will treat disclosures sensitively and will make every effort to protect the identity of the whistleblower. Confidentiality cannot be guaranteed where disclosure is required by law or to safeguard individuals.

8. Investigation & response

All concerns will be assessed promptly and proportionately. The Charity will:

- acknowledge receipt of the concern
- decide how the matter should be investigated
- appoint an appropriate investigating officer
- keep the whistleblower informed, where possible, of progress and outcomes

The Charity may involve external investigators or regulators where appropriate.

9. Protection from detriment

The Charity will not tolerate harassment, victimisation or retaliation against anyone who raises a concern in good faith. Any such behaviour from an employee will be treated as a disciplinary matter.

Anyone who believes they have suffered detriment should report this immediately.

10. Malicious or vexatious disclosures

If a disclosure is found to be deliberately false or made in bad faith, the Charity may take disciplinary or other appropriate action.

11. External disclosures

Where internal disclosure is not appropriate, or where a concern has not been adequately addressed, the concern should be raised with a relevant external body, including:

- The Charity Commission
- Local authority safeguarding teams
- HM Revenue & Customs
- The Health and Safety Executive

Independent advice can be obtained from <https://protect-advice.org.uk/>

12. Governance and oversight

The Board of Trustees has overall responsibility for this policy and for ensuring effective whistleblowing arrangements are in place.

The Board of Trustees will receive anonymised reports on whistleblowing activity as appropriate.

13. Policy review

This policy will be reviewed at least every three years, or earlier if required by changes in legislation, regulation or Charity Commission guidance.

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