



# Arts In Action CIC

## Whistleblowing Policy

### 1. Policy Statement

Arts In Action CIC is committed to maintaining an open, honest and transparent culture. We encourage all staff, freelancers, volunteers, trustees and contractors to raise concerns at the earliest opportunity if they believe wrongdoing, risk or malpractice is occurring within the organisation.

This policy supports individuals to raise concerns safely and ensures all disclosures are handled properly, fairly and in line with the Public Interest Disclosure Act 1998 and subsequent legislation.

Arts In Action CIC recognises that individuals working within the organisation are often the first to identify issues of concern. It is essential that anyone who raises a concern feels confident that they will be listened to, supported and protected from detriment.

We are committed to:

- Tackling wrongdoing, malpractice and risk.
- Responding to concerns promptly and effectively.
- Protecting whistleblowers from harassment or victimisation.
- Ensuring concerns are investigated thoroughly and fairly.

This policy is simple, clear and accessible for all workers, regardless of employment status.

### 2. Scope & Definitions

This policy applies to:

- Employees
- Freelancers
- Volunteers
- Trustees
- Contractors and agency staff
- Former staff and workers connected to Arts In Action CIC

## **Definition of Whistleblowing**

Whistleblowing is the disclosure of information by a worker that they reasonably believe shows wrongdoing and is in the public interest.

## **Types of Wrongdoing Covered**

A whistleblowing concern may include:

- A criminal offence
- A breach of legal obligations
- Miscarriage of justice
- Endangering health and safety
- Damage to the environment
- Deliberate cover-up of any wrongdoing
- Safeguarding concerns
- Serious financial irregularities or fraud
- Serious breach of organisational policy or ethics

Workers do not need to provide proof of wrongdoing—only a reasonable belief.

This policy does **not** cover concerns relating only to personal employment matters. These should be raised through the grievance procedure.

## **3. Roles and Responsibilities**

### **3.1 Senior Leadership (Directors)**

- Uphold an open culture where concerns can be raised safely.
- Ensure the policy is implemented and reviewed annually.
- Receive reports of whistleblowing activity.
- Appoint designated whistleblowing officers.

### **3.2 All Staff, Freelancers and Volunteers**

- Raise concerns when they believe wrongdoing is occurring.
- Act honestly and in the public interest when making a disclosure.

### **3.3 Line Managers / Project Leads**

- Raise awareness of the policy.
- Receive and escalate concerns promptly.
- Ensure whistleblowers are not subject to detriment.

### **3.4 Designated Whistleblowing Officers**

The following people are appointed as designated officers:

- **Director / Safeguarding Lead – Heidi Pendergrast**  
Email: Heidi@artsinaction.co.uk
- **Director** – Heidi Pendergrast / Don Pendergrast / Hayley Eaglen / Jayne Rose

Designated Officers will:

- Treat disclosures confidentially wherever possible.
- Provide impartial advice and support.
- Oversee investigations.
- Report outcomes to the Board.
- Ensure appropriate action is taken.

## 4. How to Raise a Concern

Concerns may be raised:

- Informally or formally
- Verbally or in writing
- With a line manager, project lead, or designated officer

### **Raising a Concern Internally**

A concern should include:

- Background details
- Names, dates and locations (where known)
- Why the issue is concerning

### **Confidentiality**

We respect requests for confidentiality and will not disclose a whistleblower's identity unless required by law or safeguarding processes.

### **Anonymous Disclosures**

Anonymous disclosures are accepted; however, they may limit our ability to investigate fully or provide feedback.

### **Timescales**

Within 3 working days of receiving a concern, the organisation will confirm:

- Receipt of the concern
- Whether confidentiality is requested
- Who will handle the concern
- Expected investigation timelines

Investigations will be undertaken promptly and may be handled by a designated officer or independent investigator.

## 5. How Arts In Action CIC Will Respond

- Concerns will be investigated thoroughly, promptly and objectively.
- Whistleblowers will be kept informed of progress where possible.
- Investigation outcomes will be shared unless restricted by confidentiality.
- If wrongdoing is confirmed, appropriate action will be taken (e.g., disciplinary action, safeguarding escalation, reporting to regulators).

If the individual is not satisfied with the response, they may escalate concerns to the Chair of the Board.

## 6. Protection from Harassment or Victimisation

Arts In Action CIC will not tolerate any form of victimisation or harassment toward someone who raises a concern in good faith.

Disciplinary action may be taken against anyone who victimises or attempts to deter a whistleblower.

No action will be taken against individuals who raise concerns honestly, even if they are mistaken.

## 7. Raising Concerns Externally

If an individual feels unable to raise concerns internally, they may contact a 'prescribed body' such as:

- Charity Commission
- HMRC
- Health and Safety Executive
- Information Commissioner's Office (ICO)
- Care Quality Commission
- Police (in criminal matters)

The full list is available at:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies>

Workers may also seek independent advice from **Protect**, the UK Whistleblowing Charity:

<https://protect-advice.org.uk>

## 8. Data Protection

Any personal data collected during the whistleblowing process will be handled in accordance with Arts In Action CIC's Data Protection Policy.

## 9. Monitoring and Review

Arts In Action CIC will:

- Keep a confidential record of whistleblowing cases (in line with GDPR).
- Review the policy annually.

- Ensure learning from cases informs organisational improvements.

## 10. Approval and Signatures

This Whistleblowing Policy was adopted by the Directors of Arts In Action CIC.

**Date Approved:** 1/9/2025

**Review Date:** 1/9/2026

**Signed (Director):** Heidi Pendergrast