



## Whistleblowing Policy and Procedure

Policy Approved on: 20/11/2025

Policy Review Date: 20/11/2026

### Policy Statement

Creative at HeART CIC is committed to openness, integrity, and accountability in every aspect of our work. We believe that anyone connected with the organisation—whether a Director, employee, volunteer, creative practitioner, partner, beneficiary, or member of the public—should feel confident to raise concerns about wrongdoing, risks, or unethical behaviour without fear of victimisation or reprisal.

We expect everyone representing or connected with Creative at HeART CIC to act honestly and uphold the values that protect our beneficiaries, staff, partners, and reputation.

The Board of Directors has a collective responsibility to ensure this policy is implemented effectively and reviewed regularly.

### Aims of this Policy

This policy aims to:

- Provide a clear and safe process for raising serious concerns about wrongdoing or risks related to Creative at HeART CIC.
- Encourage early reporting of concerns, knowing they will be treated seriously, fairly, and in confidence.
- Protect individuals who raise genuine concerns in the public interest, even if those concerns turn out to be mistaken.
- Ensure compliance with relevant UK law and regulatory requirements, including the Public Interest Disclosure Act 1998 (PIDA).

This policy does not form part of any employment or volunteer contract and may be amended as required.

## **What is Whistleblowing?**

Whistleblowing occurs when a person raises a concern about suspected wrongdoing, malpractice, or risk that affects others and is in the public interest.

Examples include:

### **Legal and Regulatory Breaches**

- Fraud, criminal activity, or misuse of funds.
- Breaches of law, regulation, or professional standards.
- Attempts to deliberately conceal wrongdoing.

### **Health, Safety, and Welfare**

- Risks to health, safety, or welfare of children, young people, families, or staff.
- Negligence or unsafe practices.

### **Safeguarding and Conduct**

- Abuse, neglect, or exploitation of children or vulnerable adults.
- Breaches of internal policies, ethical codes, or safeguarding standards.
- Behaviour likely to damage the organisation's reputation.

**Safeguarding Note:** Any concern relating to the welfare of a child or vulnerable person must be reported immediately in line with the Safeguarding and Child Protection Policy.

This policy does not cover personal employment concerns, which should be raised under the Grievance Policy, or service feedback, which should follow the Complaints Procedure.

## **Raising a Whistleblowing Concern**

Anyone can raise a whistleblowing concern about Creative at HeART CIC, including staff, Directors, creative practitioners, volunteers, beneficiaries, partners, or members of the public.

### **Internal Reporting:**

If you are a staff member, creative practitioner, or volunteer, you should normally raise concerns with your line manager or project lead, unless you feel unable to do so.

Concerns may be raised verbally or in writing. Your manager may be able to resolve the issue quickly or refer it to the CEO.

If you feel unable to raise your concern internally, or if it has not been appropriately addressed, you should contact:

- CEO: Dean Ashworth
- Finance Director (Governance Lead): Dawn Burt
- Independent Advice Service: Protect – the UK's whistleblowing charity (020 3117 2520 /

[www.protect-advice.org.uk](http://www.protect-advice.org.uk))

If you are an external stakeholder (e.g., parent, carer, or community partner), you may report your concern directly to the CEO via the CIC's contact details on the website.

### **External Reporting**

It may sometimes be appropriate to raise your concern with an external body if:

- The matter is serious and cannot be resolved internally.
- You believe the issue involves criminal or regulatory breaches.

Relevant external bodies may include:

- The CIC Regulator
- The Health and Safety Executive (HSE)
- The Information Commissioner's Office (ICO)
- The Police, if a criminal offence is suspected
- Protect (for confidential guidance on appropriate reporting routes)

Going directly to the media is strongly discouraged unless all other options have been exhausted and you have sought independent legal advice.

### **Confidentiality**

Creative at HeART CIC encourages individuals to raise concerns openly. However:

- Your identity will be kept confidential wherever possible.
- Anonymous disclosures will be accepted and investigated where feasible, though they may limit the ability to respond fully.
- All information will be handled sensitively and shared only with those necessary to investigate the concern.

### **Investigation and Response Procedure**

When a concern is raised:

1. The CIC will acknowledge receipt within 10 working days (unless the concern was made anonymously).
2. An initial assessment will determine whether the concern requires investigation and what action is appropriate.
3. The individual may be asked for further information or invited to a meeting. They may bring a colleague, union representative, or support person.
4. If an investigation is required, it will be conducted by an appropriate and impartial person.
5. The findings will be reviewed by the CEO and, where appropriate, the Finance Director or the Board.

You will be informed of the outcome wherever possible, subject to confidentiality and legal restrictions.

If your concern is not upheld, you will not face any negative consequences provided it was raised in good faith. Malicious or knowingly false allegations may lead to further action.

### **If You Are Not Satisfied**

If you believe your concern has not been handled appropriately, you may escalate it to:

- The Finance Director (Governance Lead); or
- The Board of Directors at Creative at HeART CIC.

You may also contact Protect for advice, or report externally to the relevant regulator if serious wrongdoing remains unaddressed.

### **Protection and Support for Whistleblowers**

Creative at HeART CIC will not tolerate harassment, retaliation, or victimisation of anyone who raises a concern in good faith.

If you believe you have been treated unfairly as a result of whistleblowing, you should report it to the CEO or the Finance Director immediately.

All whistleblowers will be supported appropriately, and their welfare will be prioritised throughout the process.

### **Monitoring and Review**

The CEO and Finance Director (Governance Lead) will monitor the implementation and effectiveness of this policy and report annually to the Board of Directors. Records of concerns and outcomes will be kept securely and in accordance with data protection requirements.

### **Contacts**

- CEO | Dean Ashworth | [dean@creativeatheart.org](mailto:dean@creativeatheart.org)
- Finance Director (Governance Lead) | Dawn Burt | [changeonesmallthing@gmail.com](mailto:changeonesmallthing@gmail.com)
- Independent Whistleblowing Charity | Protect | 020 3117 2520 / [www.protect-advice.org.uk](http://www.protect-advice.org.uk)