



Whistleblowing Policy

1. Introduction

At Actcensible, we believe in a culture of transparency, accountability, and ethical conduct. Our organisation works with vulnerable communities, including disabled, neurodivergent, and marginalized individuals. The protection of these communities, as well as the integrity of our charitable activities, relies on the willingness of individuals to speak out when something is wrong. This whistleblowing policy exists to empower staff, volunteers, freelancers, trustees, and collaborators to report concerns without fear.

2. Purpose and Scope

This policy outlines how concerns can be raised safely and how the organisation will respond. It is designed to:

- Enable early intervention when risks to safety, legality, or ethics are identified
- Ensure individuals know how and where to raise concerns
- Offer reassurance that whistleblowers will be protected
- Promote a culture of responsibility and trust

This policy applies to all those involved in the work of Actcensible, regardless of contractual status or seniority.

3. What Constitutes Whistleblowing?

Whistleblowing refers to the reporting of serious concerns that affect others, the charity, or the wider public.

These may include:

- Criminal offences or illegal acts
- Safeguarding concerns about children or adults at risk
- Serious health and safety risks, especially in performance or outreach settings
- Financial malpractice, fraud, or corruption
- Harassment, discrimination, or abuse
- Breaches of charity governance, GDPR, or professional standards

The concern must be genuine and in the public interest. Personal employment disputes or grievances should follow a separate internal grievance process.

4. Safeguarding-Related Whistleblowing

Safeguarding concerns must be escalated immediately to the Designated Safeguarding Lead, Joanne Henry. Any delay in reporting may place individuals at further risk. This includes:

- Concerns about a colleague's behaviour towards children or adults at risk
- Concerns raised by participants, families, or professionals
- Repeated failure to follow safeguarding procedures

These reports will be treated with the utmost urgency.

5. Raising a Concern

Concerns may be raised:

- Verbally in confidence with a line manager, senior leader, or DSL
- In writing via email or letter
- Through an anonymous method if the individual fears retaliation
- Anonymous concerns can be submitted through the contact form located on the *Training & Reporting* section of the Actcessible website. The form allows individuals to withhold their name and contact details if preferred. Submissions are received directly by the Designated Safeguarding Lead, Joanne Henry, and are treated with the utmost urgency and discretion.

Concerns can be raised to:

- Your direct supervisor or manager
- The Artistic Director of Actcessible
- A designated safeguarding or whistleblowing officer trustee

External disclosures may be made to:

- The Charity Commission (serious misconduct or governance);
- Public Concern at Work (independent advice);
- Local authority safeguarding teams or the police;
- HM Revenue & Customs
- The Financial Services Authority
- the Health and Safety Executive

6. Confidentiality and Anonymity

Confidentiality will be maintained wherever possible. Your identity will not be disclosed without your consent unless required by law. Anonymous reports are permitted but may limit the ability to investigate or provide updates.

Any personal data processed will be handled in accordance with the Actcessible Data Protection Policy and the Data Protection Act 2018.

7. Investigating a Disclosure

- Upon receiving a whistleblowing disclosure:
- The report will be acknowledged within 5 working days
- An initial review will determine the next steps and whether a formal investigation is required
- The individual raising the concern will be kept informed of progress and given a thorough explanation about the result of the investigation any action Actcessible is likely to take because of it, unless legal constraints apply

Investigations will be proportionate, unbiased, and documented. Findings will be reported to the Board of Trustees and outcomes recorded.

The action taken in response to a disclosure will depend on the nature of the concern. By way of example, the matters raised may result in one or more of the following:

- No action required.
- Action being taken under other Actcessible policies and/or procedures.
- An internal investigation under this policy.
- A referral to the police.
- A referral to Actcessible's external auditors.
- A referral to the Charity Commission.
- An independent enquiry.

8. Support and Protection for Whistleblowers

No whistleblower acting in good faith will face retaliation. We will not tolerate:

- Harassment, bullying, or exclusion as a result of disclosure
- Denial of professional opportunities or references
- Any form of informal punishment or pressure

Support will be offered to whistleblowers during and after the process, including access to advocacy or HR support.

9. False or Malicious Allegations

Concerns made in bad faith or with malicious intent may result in disciplinary action. Whistleblowing must never be used as a tool for personal grievance or character defamation.

10. Training and Awareness

All staff and volunteers will be briefed on this policy during induction and receive periodic reminders.

Managers will be trained in how to respond appropriately to disclosures and how to uphold whistleblower protections.

11. Monitoring and Review

This policy will be reviewed annually and whenever legal or procedural updates require. Feedback from whistleblowers and safeguarding reviews will be considered in updates.

This document was adopted by the Actcessible Board of Trustees on: 28/07/2025

To be reviewed annually or as needed.

Signed (Trustee):  _____

Name: James Michael Dean

Date: 28/07/2025

For Accessibility and inclusion related questions or suggestions, email or to raise a concern confidentially, please contact: contact@actcessible.co.uk