community albums

building better communities through music and media

Whistleblowing Policy

Purpose: This document aims to set out a framework for responding effectively to allegations of illegal misconduct or improper procedure.

Scope: This policy is to be followed by, and affects the conduct of, all Community Albums staff, trustees and volunteers. It also can be used as a process of raising allegations against contractors and partners who do not have their own whistle-blowing procedures in place.

This policy applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law (criminal)
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority
- Other unethical or medically unprofessional conduct

The policy does not apply to general forms of complaint, grievance or concern that can and should be dealt with in the boundaries of the daily management of the charity. If your concern does not match the scale of a 'whistleblower', then please instead refer to our Complaints Policy.

Definition of terms:

Abuse: Abuse is the maltreatment of another child or person at a point of vulnerability. Common forms include sexual abuse, physical abuse, emotional abuse, neglect and abuse of power.

Allegation: A claim or assumption that someone is doing something wrong, normally illegally, and sometimes without evidence

Complaint: A statement that something is unsatisfactory or unacceptable

Concern: An anxiety or worry that should be dealt with

Confidentiality: In the context of this policy, wishing to remain anonymous.

Feedback: Comment or advice given that will allow Community Albums to improve

Fraud: A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either an external organisation, a member of the public, an employee or volunteer. The criminal act of attempting to deceive and attempted fraud is treated as seriously as accomplished fraud

Grievance: A real or imagined cause for complaint, especially where treatment to others has been deemed as unfair.

MoU: Memorandum of Understanding. Community Albums have these with volunteers and partners organisations in lieu of legal contracts because of the nature of the voluntary agreement surrounding their work.

Volunteer: A person who works for Community Albums freely giving their time and expertise to support us in reaching our goals

Whistleblowing: When information is passed on concerning the significant wrongdoing of an individual or organisation. This is an act of disclosure, or 'blowing the whistle', by someone who seeks to ensure it is addressed.

Policy Statement

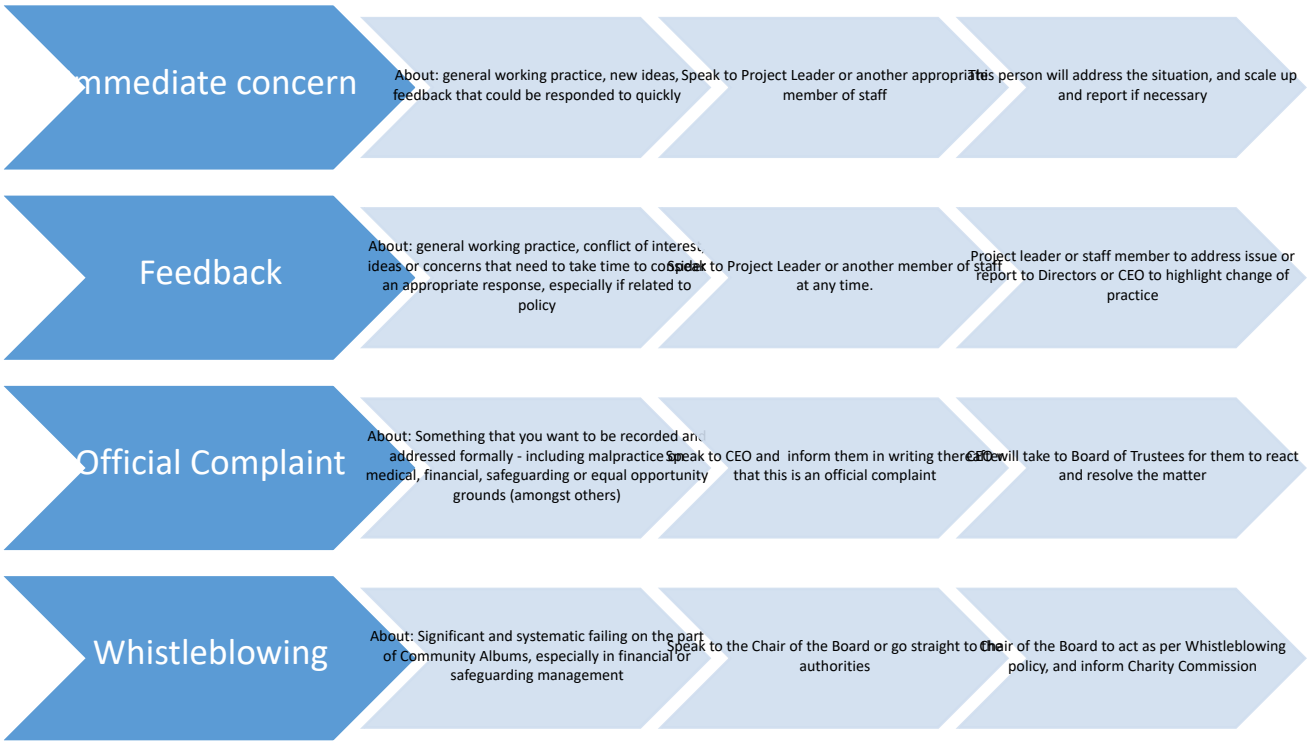
Community Albums will always aim to act in a way that delivers the best possible solutions to the beneficiaries of our programmes, and deliver it in a way that does not harm them or other staff. We will always aim to act legally, and with the highest standards or transparency and accountability. We will always highly respect and value anyone associated with our work.

In circumstances where this position is breached, the following procedures set out how allegations against us will be dealt with. This policy is in compliance of our duty under the UK's Public Interest Disclosure Act 1998 and other relevant international legislation.

Community Albums recognises that the decision to make an allegation can be a difficult. However, it will be taken seriously and all whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear. We know that they are doing their duty either to Community Albums, those who benefit from our services or the wider third sector.

Community Albums will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

The following chart indicates how we respond to concern. If there is a valid concern or complaint to make, but it is not as significant as an action that should be put through our whistleblowing procedure, please seek advice from our Complaints policy.



Standard Operating Procedures

1. Procedures for Reporting

Anyone who wishes to make an allegation should do so in writing to the Chair of the Board, Dave Mann - david.mann@bonnydowns.org

Having reported, the Chair of the Board will call an extraordinary meeting with all trustees who are not implicated by the allegation in order to proceed.

If it is not appropriate to involve the board, please write directly to whistleblowing@charitycommission.gsi.gov.uk

It is requested that allegations contain the following information:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, the whistleblower should provide any factual information or evidence that they have.

2. Procedures for Confidentiality

All allegations will be treated in confidence, unless the whistleblower requests otherwise. However, it may not be necessary, as the matter is dealt with, to always keep identity confidential (for example, if the matter ends up in court).

Community Albums will not, without the whistleblower's consent, disclose their identity to anyone other than a person involved in the investigation/allegation.

3. Procedures for Anonymous Allegations

Whistleblowers are encouraged to put their name to the allegation wherever possible. Without a name, it may be hard to further investigate and/or substantiate or prove an allegation.

Anonymous allegations will always be treated in the same manner as named allegations – the board will raise an extraordinary meeting to deal with the issue but may be limited in knowing the seriousness of the issue, the credibility of the allegation and how realistically that it can be investigated.

4. Procedures for Untrue Allegations

No disciplinary action will be taken for anyone who raises an allegation that then proves false, as long as it is clear that the allegation was raised in the public interest and for no personal, illicit gain or not in the public interest.

5. Procedure for dealing with an allegation

Upon receipt of an allegation, the Directors will immediately contact the Chair of the Board.

The Chair of the Board will call an extraordinary meeting. The board are charged to consider the following:

- The seriousness of the issue raised
- The credibility of the allegation
- Whether the allegation can realistically be investigated by themselves or if external support will be required

This conversation will be recorded and will guide their decision on next steps. These can include, but are not limited to:

- Appointment of someone to handle the investigation
- Appointing someone to, as soon as possible, complete a recorded (written or voice-recorded) interview with the person making the allegation.

    - The person making the allegation can choose whether they do this on their own or if they would like to be accompanied by the person of their choice.
- Obtain further documented evidence of the allegation
- Confirm preferred means of communication with the whistleblower, and confidentiality procedures

Additional scenarios could include:

- If the allegation relates to fraud, any donors connected will be informed as soon as possible so that any procedures they require may be taken into account
- If the allegation relates to criminal activity of any kind, the Police will be informed
- If the board feel unequipped to investigate, they will contact the Charity Commission immediately.

Within 10 working days, the board will have a written report stating:

- How to deal with the matter, and what initial inquiries have taken place
- An estimate of how long it will take to provide a final response (to the whistleblower if necessary) if further investigation is required
- Confirmation on how the whistleblower will be supported
- Confirmation if no further action is needed and justification of this decision
- Confirmation of who will have access to the report

This report will be shared with the whistleblower and anyone else who is deemed to be privy to this information. This may or may not include other staff or volunteers depending on circumstances, and what is deemed to be the best action in the interest of the organisation.

If the allegation has been made anonymously, the report will be kept in Board records but the Board may be unable to communicate the action taken.

If the issue is around suspected harm to children, the Safeguarding Policy should be referred to.

6. Procedures for supporting the whistleblower:

Community Albums will take steps to minimise any difficulties which may be experienced as a result of making an allegation. Community Albums accepts that whistleblowers need to be assured that the matter has been taken seriously and properly addressed. Thus, subject to legal constraints, they will be informed of the outcomes of an allegation investigation. This may include advice on legal procedures if necessary.

7. Procedures of ongoing responsibilities:

The Chair of Board and Directors have responsibility for ensuring that procedures are followed, records kept and that this policy is regularly reviewed and updated as necessary.

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Board of Trustees.

The Directors will report annually to the Board of Trustees on the operation of the Procedure and on the whistle-blowing allegations made during the period covered by the report. The report will be in a form which does not identify whistleblowers.

For more information on the issues raised in this policy, please refer to our:

- Complaints and Feedback policy
- The relevant policy in which you feel we are, as an organisation, in serious breach of.

This policy was agreed by the Board of Trustees on:
19th January 2023

David Mann
Chair

This policy will be reviewed: 2026