



Papatango Theatre Company Ltd

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Whistleblowing Policy and Procedure

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STATEMENT OF INTENT

Papatango Theatre Company Ltd is committed to operating as an open and transparent organisation which is aware of the possibility of unethical conduct taking place within the organisation. If an individual discovers serious malpractice or wrongdoing, then this procedure should be in place to remedy any concerns that may be apparent. This should allow employees or parents/carers to report under it, in the knowledge that they can do so safely and without fearing any negative consequences to themselves (provided they are not deliberately abusing the procedure).

POLICY AIMS

This procedure aims:

- To encourage staff to report any concerns and be confident that they will be listened to;
- To provide guidance on how to raise concerns;
- To reassure staff, parents/carers or other relevant parties that they will not face retribution or any other negative consequences for reporting genuine concerns.

DEFINITION OF WHISTLEBLOWING

Whistleblowing is considered to be the act of raising concerns over organisational malpractice, corruption, abuse, bullying or other unacceptable conduct, which could include but is not limited to:

- a criminal offence such as fraud or embezzlement
- someone's health and safety being put in danger or their mental or physical wellbeing otherwise put in jeopardy
- risk or actual damage to the environment
- a miscarriage of justice
- the company failing in its duty of care to staff, participants, children, volunteers or other members of the public
- covering up wrongdoing

A whistleblower is a person who raises a genuine concern that he/she/they believes is in the public interest relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the organisation's activities (a whistleblowing concern) you should report it under this policy.

REPORTING CONCERNS

The first point of contact for any concerns, unless your concern directly relates to these individuals, should be one of either:

- Chris Foxon, Executive Director
- Stephanie Bain, Chair of the Board of Trustees

Any staff member in receipt of a concern will then:

- Speak to the whistleblower to ascertain full details
- Nominate an appropriate investigating officer or team of officers
- Protect the whistleblower's identity in the strictest confidence unless informed by that person that it is not necessary to do so or unless it would not be legal to do so
- Report back to the Board of Trustees the finding of the investigating officer(s), to await their decision on how to proceed, and liaise with the whistleblower about these findings and the decision of the Board

If for any reason it would not be appropriate for you to raise a concern with either of the individuals named above, then you should contact any other member of the Board of Trustees following the guidance laid out in the company's Complaints Policy (which can be viewed on the 'Policies' page of our website on www.papatango.co.uk).

If it would not be appropriate to contact anyone directly involved in the governance of the company, then you should approach an external advisory organisation to seek advice. One such organisation is Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are listed at the end of this policy.

CONFIDENTIALITY/ANONYMITY

A whistleblower's identity will at all times, in so far as is possible within the law, remain confidential or anonymous unless that person provides information in writing that this is not necessary or that they waive this right. This will be a priority, but for clarity the company cannot guarantee absolute confidentiality, as some circumstances will prevent this as a result of other legislation.

INVESTIGATIONS

Should the investigating officer(s) appointed to initially investigate the reported concern feel it meets the threshold to fall within this policy, they will recommend an appropriate course of action to the Board of Trustees as well as contact any other bodies such as the Local Authority where there may be a duty to do so.

This initial investigation will be completed within a month of the concern being reported. If any further action is recommended, then this will follow an appropriate timeline according to the circumstances. If no further action is recommended, the officer's findings will be written up and kept on file; all details will be kept confidential provided this does not breach the requirements of any other legislation. Throughout, the whistleblower will be kept informed of progress by the person to whom they reported the concern.

Should an investigation at any point establish that the whistleblower made false allegations maliciously or outside of the organisation's code of conduct/practice, then they may face disciplinary action.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

No individual will suffer any detrimental treatment as a result of raising a concern (provided this is not done maliciously). Discriminatory consequences from which any whistleblower will be protected include but are not limited to:

- dismissal;
- disciplinary action;
- threats;
- unfavourable treatment in their employment (e.g. being overseen for promotions);
- any other unacceptable conduct as laid out in the company's Code of Conduct (which can be viewed on the 'Policies' page of our website on www.papatango.co.uk).

Any person who feels that they have experienced any such discriminatory treatment should report this concern following the guidance laid out in the company's Complaints Policy (which can be viewed on the 'Policies' page of our website on www.papatango.co.uk).

Anyone perpetrating or condoning any such unacceptable conduct will be subject to disciplinary action.

WHISTLEBLOWING TO EXTERNAL ORGANISATIONS

We prefer in the first instance to manage any concerns internally but accept that there are times when this step would not be appropriate. In this case, you should approach an external advisory organisation to seek whistleblowing advice. One such organisation is Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline.

Their contact details are:
Public Concern at Work
Helpline: (020) 7404 6609
E-mail: whistle@pcaw.co.uk
Website: www.pcaw.co.uk

Whistleblowing directly to the media is seldom a constructive step and one that should only be taken if all other approaches identified in this policy have been attempted without satisfaction or are not possible.