

creative ✦ active ✦ lives

# WHISTLEBLOWING POLICY & PROCEDURES

Version No. 7

Dated: 2nd June 2026

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## Scope

This policy applies to all Creative Active Lives CIC staff (including directors, board officers, employees, contractors, agency workers, casual workers, volunteers, consultants and trainees) It relates to actions by such staff as well as any concerns a colleague may have with one of Creative Active Lives CIC customers, suppliers or any other third parties with which Creative Active Lives CIC interacts or does business.

## Introduction

Creative Active Lives CIC is committed to conducting their business fairly, honestly, with transparency, and in compliance with all legal and regulatory obligations. We expect all Creative Active Lives CIC staff, and anyone acting on our behalf to do the same and to maintain the highest standards of ethical business behaviour. All organisations face the risk of things going wrong from time to time, and a culture of openness and accountability is essential in order to prevent such situations occurring, and to address them when they do occur.

A key aspect of ensuring Creative Active Lives CIC commitment to conducting business with integrity is providing a robust whistleblowing policy and reporting channel for Creative Active Lives CIC staff. All staff can feel able to report any wrongdoing in confidence.

At Creative Active Lives CIC, we encourage staff to report any concerns as soon as they arise; such concerns can be of any nature, including any matters in connection with Creative Active Lives CIC staff, as well as customers, suppliers and other third parties.

The aim of this policy therefore is to:

- Encourage and empower staff to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Provide staff with guidance as to how to raise those concerns.
- Reassure staff that they will be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- Encourage a culture of openness.
- Ensure compliance for Creative Active Lives CIC with the relevant legislation.

The below sets out in more detail what type of behaviour this policy covers and what should be reported pursuant to this policy.

## **What Type of Misconduct Should Be Reported?**

As noted above, Creative Active Lives CIC wants to hear about such conduct that is unlawful, dishonest or unethical as soon as possible and is committed to addressing it. The below provides examples of the types of misconduct or behaviour that could give rise to a report; however, it is not an exhaustive list and Creative Active Lives CIC encourages all staff to report any behaviour or incidents which they have concerns about.

- Criminal activity or offences.
- Corruption, bribery or blackmail.
- Financial malpractice, impropriety or mismanagement.
- Facilitating tax evasion.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Conduct likely to damage Creative Active Lives CIC reputation or financial wellbeing.
- Actions which endanger the health and safety of Creative Active Lives CIC staff or the public.
- Actions which cause damage to the environment.
- The deliberate provision of false information to public officers.
- A miscarriage of justice.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of information relating to any of the above matters.
- Any retaliation against someone for speaking up or “whistleblowing”.

Everyone has a responsibility to report any such misconduct or potential misconduct as soon as they become aware of it. If you are uncertain whether something is within scope of this policy, it is preferable that any concerns are reported rather than kept to oneself.

## **How to Report A Concern**

The whistleblowing procedures Creative Active Lives CIC has in place ensure that you will be taken through and will fully understand the overall process and next steps.

## **Safeguarding Whistleblowing**

Creative Active Lives CIC recognises that safeguarding concerns may not always be reported through normal management channels. Staff, volunteers, trustees, contractors, agency workers, and anyone working on behalf of the organisation have a duty to raise concerns where they believe a child, young person, or adult at risk may be experiencing abuse, neglect, exploitation, harm, unsafe practice, or a breach of safeguarding procedures.

Whistleblowing concerns may include, but are not limited to:

- Failure to follow safeguarding policies or procedures
- Failure to report safeguarding concerns
- Inappropriate relationships or professional boundary breaches

- Abuse, neglect, exploitation, or harm involving children, young people, or adults at risk
- Unsafe recruitment practices
- Conduct that places children, young people, or adults at risk of harm
- Attempts to conceal safeguarding concerns, incidents, or allegations
- Victimisation of individuals who raise safeguarding concerns

Safeguarding concerns should normally be reported to the Designated Safeguarding Lead (DSL).

Where concerns relate to the DSL, a Director, Trustee, or another senior individual, concerns should be reported directly to a member of the Board of Directors.

Where an individual believes that safeguarding concerns have not been addressed appropriately, or where normal reporting routes cannot be followed, they may contact external agencies directly, including Children's Social Care, Adult Social Care, the Police, the Local Authority Designated Officer (LADO), the NSPCC Whistleblowing Advice Line, or other relevant safeguarding bodies.

No member of staff, volunteer, trustee, contractor, or agency worker will suffer disadvantage, victimisation, harassment, or retaliation for raising a genuine safeguarding concern in good faith.

#### Option 1 – Internal Reporting

Safeguarding or whistleblowing concerns should normally be reported to:

Rachel Conlisk  
Director and Designated Safeguarding Lead  
rachel@creativeactivelives.org.uk  
07790 443007

Concerns may be raised verbally or in writing and will be treated seriously and confidentially.

If the concern relates to Rachel Conlisk, the Designated Safeguarding Lead, or if the individual does not feel comfortable reporting through this route, concerns should be reported directly to a member of the Board of Directors. Contact [admin@creativeactivelives.org.uk](mailto:admin@creativeactivelives.org.uk) for their contact details.

Board contacts:

Emma Richardson – Director

Rachel Jones – Director

Dan Noble - Director

The Board of Directors will ensure that concerns are considered independently, investigated appropriately, and referred to external agencies where necessary.

Individuals raising concerns in good faith will be protected from victimisation, retaliation, discrimination, or any other detriment arising from making a disclosure.

## Option 2 – External Reporting

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. However, Creative Active Lives CIC recognises that there may be circumstances where staff may feel they wish to report matters to outside bodies such as a regulator or the police. It will very rarely be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline which can be reached on 020 3117 2520, and further information can be found on their website <https://protect-advice.org.uk/>. They also have a list of prescribed regulators for reporting certain types of concern. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first.

## **What Will Creative Active Lives CIC Do About Concerns That Are Raised?**

Once you have raised a concern, the person to whom you raised the concern will make a decision as to who is best placed to investigate the matter. We will endeavour to keep you informed of the progress of the investigation. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential. If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

## **Protection Against Retaliation**

Creative Active Lives CIC will ensure that genuine concerns raised of a reasonable belief can be raised without fear of retaliation and will not affect the continued employment, work or career with Creative Active Lives CIC of the person who raised their concerns.

Creative Active Lives CIC will not tolerate harassment, victimisation or retaliation towards any person for raising concerns on the basis of a reasonable belief or objecting or refusing to participate in any act or practice that they honestly believe to be in violation of law or misconduct. Any such harassment, victimisation or retaliation will be treated as very serious and will be a disciplinary offence in accordance with Creative Active Lives CIC procedures.

## **Confidential and Anonymous Reporting**

All reports will be handled in complete confidence and the identity of the individual reporting the issue will be kept confidential and only disclosed to those who need to know it for purposes of any investigation.

This policy will be reviewed annually, or sooner where there are changes to legislation, statutory guidance, safeguarding requirements, organisational structures, or following a significant incident or concern.

### **Policy Review**

This policy will be reviewed annually, or sooner where there are changes to legislation, statutory guidance, safeguarding requirements, recruitment practices, or organisational structure.

Last reviewed: 2nd June 2026

Next review date: 2nd June 2027

Approved by: Rachel Conlisk  
Director  
Creative Active Lives CIC