



Kandu Arts for Sustainable Development and Kandu Arts Community Projects

Whistleblowing Policy

Kandu Arts for Sustainable Development and Kandu Arts Community Projects CIC is committed to the highest possible standards of openness, probity and accountability. This whistleblowing policy and procedure supports this commitment.

This policy gives employees and others with genuine concerns about malpractice or wrongdoing within Kandu Arts a way to voice those concerns without fear of victimisation. Often it is those closest to an organisation who realise that there is something wrong. Sometimes people are reluctant to act upon their concerns because they think that they are being disloyal, or because they are afraid that they might be victimised if they speak up.

This concern may be about something that is:

- unlawful, including financial or fraudulent malpractice such as embezzlement, bribery, corruption, dishonesty, etc.
- against establishment standards of practice
- improper conduct. Concerns or allegations which fall within the scope of specific procedures, e.g. child protection or financial irregularities will normally be referred for consideration under those procedures.

Edward Deedigan is the nominated member of staff identified by Kandu Arts as the first point of contact for whistleblowing queries.

Reviewed: February 2025 Review Date: February 2026

The purpose of this policy is to provide employees with the help and support they need to speak up and be confident that it can be done safely. Concerns will be taken seriously, promptly and fairly.

How to raise a concern

Initial concerns should be raised with the nominated staff member. If the employee believes that this staff member is implicated, then the employee should approach the Alternative Provision Manager. Within 48 hours, the nominated staff member will contact the employee to arrange to meet with them to discuss their concerns. Before the meeting, it would be helpful if employees write down what they consider the problem to be, giving names, dates and places where possible. If there are any other

documents that the employee thinks may be helpful, they can bring them to the meeting. Employees are advised to bring a friend or colleague with them to the meeting.

Employees are encouraged to raise their concern in person, because concerns that are expressed anonymously are difficult to investigate. However, Kandu Arts will exercise its discretion in deciding whether to investigate an anonymous allegation.

The factors taken into account will include:

- the seriousness of the issues raised;
- the credibility of the allegation;
- the likelihood of being able to confirm the allegation from attributable sources.

How will Kandu Arts respond.

After the initial meeting, the nominated staff member will arrange for discreet initial enquiries to be made to decide whether an investigation is appropriate and if so, it will take the following form:

The nominated staff member will write to the employee within 10 days of the initial meeting to:

- acknowledge that the employees concern has been received
- outline the understanding of what the issues are;
- indicate how Kandu Arts proposes to deal with the matter.

If the nominated staff member decides that it is appropriate for an investigation to be carried out, this will either be done by them, or by another staff member who is asked to investigate – the investigating officer. However, it may sometimes be necessary for a concern to be referred to the police, an external auditor, or for it to be the subject of an independent enquiry. In addition, where it is established that the complaint involves issues of bullying or unlawful discrimination, it may be necessary to involve Kandu Arts legal advisors.

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If an investigation is carried out, the employee will be informed of the final outcome. It might not be possible to give the employee full details of the outcome if it contains personal details of a third party, because Kandu Arts has a duty to protect personal information under the Data Protection Act 2018.

How will the Kandu Arts treat whistleblowers?

If an employee makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against the employee. If an employee knowingly makes malicious allegations, disciplinary action will be taken against them.

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Disciplinary action will be taken against any member of staff who tries to stop another employee from raising a concern or who is responsible for any act of recrimination or victimisation against an employee who raises a concern. Where an employee may have been party themselves to an act of possible gross misconduct on which they are now 'blowing the whistle', this could be considered in mitigation. They are not, however, exempt from disciplinary action. Disciplinary action may be taken against employees if they contact the media with concerns about conduct at work without first following the steps set out in this policy. Kandu Arts will make every effort to protect an employee's identity when they raise a concern and does not want their name to be disclosed. It must be appreciated however, that the investigation process may reveal the source of the information and a statement by the employee may be required as part of the evidence. If an employee raises a concern, they will be given the opportunity to feed back any issues or problems they may have experienced as a result. The purpose of this is to ensure that employees who have raised concerns in good faith do not suffer as a result