



Speaking Up (Whistleblowing) Policy

Document Control

ITEM	DETAILS
Policy Number	GP06
Policy Title	Speaking Up (Whistleblowing) Policy
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Applies To	Directors, Committee Members, Volunteers, Contractors, Consultants and anyone acting on behalf of Gravesham Pride CIC
Related Policies	Articles of Association, Governance Handbook, Code of Conduct, Conflict of Interest Policy, Safeguarding Policy, Complaints & Concerns Policy
Related Legislation	Public Interest Disclosure Act 1998, Employment Rights Act 1996 (where applicable), Bribery Act 2010, Equality Act 2010

1. Purpose

Gravesham Pride CIC is committed to creating an open, honest and accountable organisation where everyone involved feels confident to raise concerns if something does not seem right.

As a volunteer-led Community Interest Company, we recognise that our Directors, volunteers, contractors and delivery partners are often the first to become aware of practices that may place people at risk, undermine good governance or damage the reputation of the organisation.

Speaking up is an important part of protecting our community, maintaining public confidence and ensuring that Gravesham Pride continues to operate with integrity.

The purpose of this policy is to provide a clear and supportive framework for raising concerns about serious wrongdoing, unsafe practices or behaviour that conflicts with our values.

We encourage concerns to be raised at the earliest opportunity so that they can be considered fairly, investigated where appropriate and addressed before problems become more significant.

Speaking up is a positive action. It helps us learn, improve and protect the organisation for everyone involved.

2. Scope

This policy applies to everyone acting on behalf of Gravesham Pride CIC, including:

- Board Directors
- Committee Members
- Volunteers
- Contractors
- Consultants
- Performers
- Stallholders
- Sponsors
- Delivery Partners
- Anyone representing Gravesham Pride CIC in an official capacity

This policy applies to concerns relating to the governance, activities or operation of Gravesham Pride CIC.

It should be used where someone genuinely believes that serious wrongdoing, unsafe practice or unethical behaviour has occurred, is occurring or is likely to occur.

Examples include concerns relating to:

- safeguarding
- fraud
- financial misconduct
- criminal activity
- serious health and safety risks
- corruption
- abuse of authority
- deliberate breaches of organisational policies
- serious governance failures
- deliberate concealment of wrongdoing

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This policy is not intended to replace day-to-day discussions or the organisation's Complaints & Concerns Policy.

Where concerns relate to a personal disagreement, event feedback or a routine complaint from a member of the public, the appropriate organisational procedure should normally be used.

3. Definitions

Speaking Up

Speaking up means raising a genuine concern about serious wrongdoing, unsafe practice or behaviour that could place people, the organisation or the wider community at risk. The concern may relate to something that has happened, is currently happening or is likely to happen in the future.

Whistleblowing

Whistleblowing is the disclosure of information relating to serious wrongdoing that is made in the public interest. Not every concern will constitute whistleblowing in a legal sense, but every genuine concern raised under this policy will be taken seriously and considered appropriately.

Good Faith

A concern is raised in good faith when the individual genuinely believes that the information they are providing is true or substantially true, even if subsequent enquiries determine that no wrongdoing occurred. Raising a concern honestly will never be regarded as wrongdoing.

Public Interest

A matter is considered to be in the public interest where it affects, or has the potential to affect:

- the safety of others
- the proper governance of the organisation
- public confidence
- the lawful use of organisational resources
- the reputation of Gravesham Pride CIC

4. Our Commitment

Gravesham Pride CIC believes that openness and accountability are essential to good governance.

We are committed to creating an environment where people feel able to speak up without fear of being ignored, criticised or treated unfairly. We will:

- listen respectfully to concerns
- treat concerns seriously
- consider information fairly and objectively
- maintain confidentiality wherever reasonably possible
- investigate concerns proportionately
- take appropriate action where required
- learn from concerns to improve the organisation

We recognise that raising concerns can feel difficult. For that reason, we encourage anyone who is uncertain to seek advice before deciding whether to raise a concern.

No Director, volunteer or person acting on behalf of Gravesham Pride CIC will be treated unfairly for raising a genuine concern honestly and in good faith.

5. Policy

5.1 General Principles

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Everyone representing Gravesham Pride CIC has a responsibility to protect the organisation, its volunteers, event attendees and the wider community.

If something appears unsafe, unlawful, dishonest or inconsistent with our values, it should not be ignored.

Concerns should be raised as soon as reasonably practicable. Early action allows concerns to be understood, risks to be managed and improvements to be made before problems become more significant.

Where uncertainty exists, individuals are encouraged to seek advice rather than remain silent.

Speaking up demonstrates commitment to the organisation and should always be viewed positively when done honestly and responsibly.

5.2 What Should Be Raised Under This Policy?

This policy should be used where someone reasonably believes that serious wrongdoing has occurred or may occur.

Examples include:

- fraud or financial irregularities
- theft or misuse of organisational funds
- bribery or corruption
- safeguarding failures
- serious breaches of health and safety
- discrimination affecting the organisation or community
- abuse of authority
- serious breaches of governance
- deliberate breaches of organisational policies
- unlawful activity
- deliberate attempts to conceal wrongdoing

Not every issue will amount to whistleblowing. However, every genuine concern will be considered carefully and, where appropriate, directed through the most suitable organisational process.

5.3 Concerns That Should Normally Be Raised Elsewhere

Some matters are more appropriately managed through other organisational procedures. These may include:

- routine event feedback
- complaints from members of the public
- volunteer welfare matters
- suggestions for service improvement
- requests for information
- minor disagreements between volunteers

Where this is the case, the individual will be supported to use the most appropriate policy or procedure.

5.4 How to Raise a Concern

Anyone who has a genuine concern should raise it as soon as reasonably practicable. Concerns should normally be raised with:

- the Chair of the Board

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- another Director
- the Event Manager (during a live event, where appropriate)
- the Safeguarding Lead where the concern relates to safeguarding

Concerns may be raised verbally or in writing.

Individuals are encouraged to provide as much relevant information as possible, including:

- what happened
- where and when it happened
- who was involved
- whether anyone may be at immediate risk
- whether any evidence is available

Individuals are **not** expected to investigate concerns themselves or prove that wrongdoing has occurred. Their responsibility is simply to raise the concern honestly and provide any information they have.

5.5 Confidentiality

Gravesham Pride CIC will make every reasonable effort to protect the identity of anyone who raises a concern.

Information will only be shared with those who have a legitimate need to know in order to assess or investigate the matter. However, complete confidentiality cannot always be guaranteed.

There may be circumstances where information must be disclosed:

- to comply with the law
- to protect someone from harm
- to support a safeguarding investigation
- to assist the Police or another statutory authority
- where disclosure is otherwise necessary in the public interest

Where appropriate, individuals will be informed if information needs to be shared.

5.6 Anonymous Concerns

Individuals may choose to raise concerns anonymously. Anonymous concerns will still be considered carefully. However, anonymity can make it more difficult to:

- clarify information
- gather further evidence
- provide updates
- investigate concerns fully

For this reason, individuals are encouraged to identify themselves wherever they feel able to do so. The organisation will always seek to treat those raising concerns fairly and respectfully.

5.7 Protection from Unfair Treatment

Gravesham Pride CIC values honesty and integrity.

No Director, volunteer or person acting on behalf of the organisation will be treated unfairly because they have raised a genuine concern honestly and in good faith.

We will not tolerate behaviour intended to discourage individuals from speaking up.

Examples of unacceptable behaviour include:

- intimidation
- harassment
- bullying
- victimisation
- exclusion from organisational activities because someone raised a genuine concern

Anyone who attempts to discourage or retaliate against an individual for raising a genuine concern may themselves be subject to appropriate organisational action.

5.8 Considering and Investigating Concerns

Every concern raised under this policy will be considered objectively. The response will depend upon:

- the nature of the concern
- the seriousness of the alleged issue
- whether immediate action is required
- whether another policy is more appropriate
- whether external organisations should be involved

Some concerns may be resolved quickly through discussion or clarification. Others may require a more detailed review by the Board or referral to an external organisation.

Individuals raising concerns will normally be informed that their concern has been received.

Where appropriate and lawful to do so, they may also receive general information regarding the outcome. Confidentiality and the privacy of others may limit the amount of information that can be shared.

5.9 Concerns Requiring Immediate Action

Some concerns require immediate action to protect people or the organisation. Examples include:

- safeguarding concerns
- serious health and safety risks
- criminal activity
- fraud in progress
- immediate risks to life or wellbeing

Where someone is believed to be at immediate risk of harm, emergency services should be contacted without delay.

Safeguarding concerns should always be managed in accordance with the Gravesham Pride CIC Safeguarding Policy.

5.10 External Reporting

Gravesham Pride CIC encourages concerns to be raised internally wherever appropriate so that issues can be addressed quickly and effectively. However, there may be circumstances where concerns should be reported directly to an external organisation.

Examples may include:

- the Police
- the Local Authority
- safeguarding agencies
- the Charity Commission (where relevant to charitable partners)
- the Information Commissioner's Office

- other regulatory or statutory bodies

Individuals should seek advice wherever possible before making external disclosures unless there is an immediate risk to safety or there is another compelling reason to report externally without delay.

5.11 Deliberately False or Malicious Allegations

Gravesham Pride CIC recognises that concerns raised in good faith may ultimately prove to be unfounded. This will not result in criticism or unfair treatment. However, deliberately making false, malicious or misleading allegations may undermine trust and waste valuable organisational resources. Where there is clear evidence that an allegation has been made dishonestly or with malicious intent, appropriate organisational action may be considered.

This provision is intended to discourage deliberate misuse of the policy and should never discourage individuals from raising genuine concerns.

5.12 Learning and Continuous Improvement

Speaking up provides valuable opportunities for organisational learning.

Where concerns identify weaknesses in governance, policies or procedures, Gravesham Pride CIC will seek to:

- identify lessons learned
- improve organisational practice
- strengthen governance arrangements
- reduce the likelihood of similar issues arising in the future

Our aim is not simply to respond to concerns, but to use them as opportunities to improve the organisation and better serve our community.

6. Roles and Responsibilities

6.1 Board of Directors

The Board of Directors is responsible for:

- promoting an open and transparent culture
- ensuring concerns are considered appropriately
- overseeing investigations where required
- ensuring lessons learned are implemented
- maintaining confidence in the organisation's governance

6.2 Chair

The Chair is responsible for:

- receiving concerns where appropriate
- ensuring concerns are managed fairly
- seeking advice where necessary
- reporting significant governance concerns to the Board
- ensuring confidentiality is maintained wherever reasonably possible

Where the concern relates to the Chair, it should be raised with another Director.

6.3 Directors

Directors are expected to:

- encourage openness
- listen respectfully

- respond appropriately to concerns
- maintain confidentiality
- comply with this policy

6.4 Volunteers

Volunteers are encouraged to:

- raise genuine concerns promptly
- cooperate with enquiries where appropriate
- maintain confidentiality during any investigation
- support a culture of openness and accountability

7. Monitoring and Compliance

The Board of Directors is responsible for monitoring the effectiveness of this policy and ensuring that concerns are managed fairly, consistently and in accordance with the organisation's values.

Monitoring may include:

- reviewing concerns raised under this policy
- identifying themes or recurring issues
- considering lessons learned following investigations
- reviewing governance arrangements
- ensuring improvements are implemented where appropriate

Records relating to concerns raised under this policy will be treated confidentially and retained only for as long as necessary.

The Board will periodically consider whether this policy remains appropriate for the size, activities and governance arrangements of Gravesham Pride CIC.

8. Equality Statement

Gravesham Pride CIC is committed to creating an environment where everyone feels able to speak up, regardless of their background, identity or personal characteristics.

This policy will be applied fairly, consistently and without discrimination on the grounds of:

- age
- disability
- gender reassignment
- marriage or civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Reasonable adjustments will be considered wherever required to enable individuals to raise concerns in a way that is accessible and appropriate to their needs.

We recognise that people may feel more or less confident about raising concerns for a variety of reasons, and we are committed to creating an inclusive culture where every voice is valued.

9. Policy Review

This policy will normally be reviewed every two years. An earlier review may take place where:

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- legislation changes
- organisational learning identifies improvements
- governance arrangements change
- significant concerns highlight the need for amendments
- the Board determines that revisions are required

The Board of Directors is responsible for approving any amendments to this policy.

Appendix A – Practical Examples

The following examples illustrate how this policy should be applied in practice.

Example 1 – Financial Concern

Situation

A volunteer notices that organisational funds appear to have been used for personal purchases without authorisation.

Expected Practice

The volunteer raises the concern with the Chair or another Director as soon as reasonably practicable. The concern is considered objectively and, where necessary, investigated.

Inappropriate Practice

Ignoring the concern or discussing it widely with other volunteers instead of reporting it appropriately.

Example 2 – Safeguarding Concern

Situation

During an event, a volunteer believes that another volunteer has failed to follow safeguarding procedures, potentially placing someone at risk.

Expected Practice

The concern is reported immediately to the Safeguarding Lead or another Director in accordance with the Safeguarding Policy.

Inappropriate Practice

Attempting to investigate the matter independently or discussing the allegation publicly.

Example 3 – Serious Health and Safety Risk

Situation

A volunteer identifies that emergency exits are being deliberately obstructed during event set-up.

Expected Practice

The concern is raised immediately with the Event Manager or a Director so that corrective action can be taken without delay.

Inappropriate Practice

Assuming someone else will deal with the issue or waiting until after the event to mention it.

Example 4 – Abuse of Position

Situation

A Director repeatedly uses their position to influence organisational decisions for personal benefit.

Expected Practice

The concern is raised confidentially with another Director or the Chair for appropriate consideration.

Inappropriate Practice

Ignoring the behaviour because the individual holds a senior position.

Example 5 – Deliberate Breach of Policy

Situation

A volunteer becomes aware that confidential organisational information is being deliberately shared outside the organisation without authority.

Expected Practice

The concern is reported promptly so that appropriate action can be taken to protect the organisation.

Inappropriate Practice

Sharing the information further or assuming that the behaviour is acceptable.

Example 6 – Fraudulent Activity

Situation

A volunteer discovers evidence suggesting that receipts submitted for reimbursement have been deliberately falsified.

Expected Practice

The information is reported confidentially through this policy and any supporting evidence is preserved.

Inappropriate Practice

Confronting the individual directly or making accusations publicly before the concern has been considered.

Example 7 – Concern Raised in Good Faith

Situation

A volunteer reports a concern believing that organisational funds have been misused. Following investigation, it is established that no wrongdoing occurred.

Expected Practice

The volunteer is thanked for raising the concern responsibly. No criticism or adverse treatment occurs because the concern was raised honestly and in good faith.

Inappropriate Practice

Treating the volunteer unfairly simply because the concern could not be substantiated.

Key Principles

Whenever you are considering whether to raise a concern, ask yourself:

- Could this place someone at risk?
- Could this damage the organisation or the community we serve?
- Could this involve unlawful or unethical behaviour?

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- Would I regret not speaking up if the situation became worse?
- Am I raising this concern honestly and in good faith?

If the answer to any of these questions is **yes** or **possibly**, you should seek advice or raise the concern.

Remember:

If something doesn't feel right, speak up.

Appendix B – Related Legislation and Governance Documents

Primary Legislation

This policy should be read alongside relevant legislation, including:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996 (*where applicable to protected disclosures*)
- Bribery Act 2010
- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)

Related Gravesham Pride CIC Governance Documents

This policy should be read alongside the following Gravesham Pride CIC governance documents:

- Articles of Association
- Governance Handbook
- GP01 – Code of Conduct
- GP02 – Equality, Diversity, Inclusion & Accessibility (EDIA) Policy
- GP03 – Safeguarding Policy
- GP04 – Conflict of Interest Policy
- GP05 – Confidentiality & Data Protection Policy
- GP07 – Complaints & Concerns Policy
- GP08 – Volunteer Management Policy
- GP09 – Volunteer Code of Conduct
- GP10 – Health, Safety & Safe Working Policy
- GP11 – Risk Management Policy
- GP12 – Financial Management Policy
- GP13 – Document Control & Records Management Policy
- GP14 – Communications, Branding & Social Media Policy
- GP15 – Environmental Sustainability Policy
- GP16 – Event Governance & Delivery Policy

Good Governance Principles

This policy supports Gravesham Pride CIC's commitment to:

- Integrity
- Transparency
- Accountability
- Safe and ethical practice
- Respect
- Public confidence
- Continuous improvement

Review and Version Control

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This appendix will be reviewed whenever there are significant changes to legislation, recognised good practice or related Gravesham Pride CIC governance documents.

Our Promise

Gravesham Pride CIC is committed to fostering a culture where honesty, openness and accountability are encouraged and valued.

We believe that speaking up protects people, strengthens governance and helps us continuously improve as an organisation.

Everyone involved with Gravesham Pride should feel confident that genuine concerns will be listened to respectfully, considered fairly and managed appropriately.

By creating an environment where concerns can be raised without fear, we strengthen trust, protect our community and uphold the values upon which Gravesham Pride CIC is built.