

# **Whistleblowing Policy (Public Interest Disclosure)**

## **MySmallHelp - UK registered charity no. 1123830**

Document Owner: The Board of Trustees

Updated to: October 2025

### **1. Policy Statement and Purpose**

MySmallHelp charity ('MSH') is committed to the highest standards of openness, honesty, integrity, and accountability. We encourage all individuals working with us to report genuine concerns about wrongdoing or malpractice as soon as possible, in the knowledge that their concerns will be taken seriously, investigated appropriately, and that they will be protected from victimisation or unfair treatment.

This policy sets out the procedure for individuals to raise serious concerns, known as 'whistleblowing,' in the public interest.

### **2. Scope: Who does this Policy apply to?**

This policy applies to all Workers of the charity, including:

- Employees (full-time, part-time, temporary).
- Volunteers.
- Trustees.
- Agency staff, contractors, and consultants working with the charity.

We encourage all these individuals to use this policy to raise concerns.

### **3. What is Whistleblowing?**

Whistleblowing is the disclosure of information where an individual has a reasonable belief that one or more of the following serious wrongdoings is occurring, has occurred, or is likely to occur at the charity:

- Criminal activity: Such as theft, fraud, or breach of the Bribery Act.
- Failure to comply with any legal obligation: Such as a failure to meet health and safety requirements, data protection (GDPR) breaches, or charity law obligations.
- Endangering an individual's health or safety.
- Damage to the environment.
- Risk to the protection of children or vulnerable adults (Safeguarding issues).
- Deliberate concealment of information relating to any of the above.
- Misuse of charitable funds or assets.

Note: This policy is for serious concerns relating to the public interest or the integrity of the charity. Grievances or complaints should be raised through the separate Complaints Policy.

#### **4. Protection for the Whistleblower (The Discloser)**

The charity will not tolerate the harassment or victimisation of anyone who raises a genuine concern under this policy, even if the concern is later proven to be unfounded.

- **No Reprisal:** Any individual who is found to have victimised or retaliated against a person who has raised a genuine concern will face disciplinary action.
- **Confidentiality:** The charity will make every effort to respect the confidentiality of the individual raising the concern and will not reveal their identity without their consent unless required by law or necessary for a proper investigation (e.g., to the police or a regulator).

Protection only applies to those who raise a concern in good faith (i.e., you genuinely believe the information to be true and in the public interest). Knowingly making a false or malicious allegation will be treated as a disciplinary matter.

#### **5. Procedure for Raising a Concern**

##### A. Internal Contacts

Concerns should be raised internally in the first instance. Given the small nature of the charity and the small number of Trustees, the primary contacts are listed below:

Leander Hollings - [dadateacherleander@gmail.com](mailto:dadateacherleander@gmail.com)

Deb Priestly - [deborahpriestley@gmail.com](mailto:deborahpriestley@gmail.com)

How to Raise a Concern:

- Concerns can be raised verbally or in writing. We encourage raising the concern in writing where possible, detailing:
  - The nature of the concern and the names of anyone involved (if known).
  - Dates, times, and locations of the alleged events.
  - The reasons for the concern and why you believe it is true.
  - Any documentary evidence you may have.

The recipient will arrange a confidential meeting with you as soon as possible to discuss your concern.

##### B. What Happens Next?

- **Acknowledgement:** Your concern will be acknowledged in writing within 5 working days.
- **Assessment:** The designated recipient will immediately assess the concern with the Trustee Board (excluding any Trustee who is the subject of the concern) to determine if it is a whistleblowing matter and what level of investigation is required.
- **Investigation:**

- The Trustees will appoint a Trustee or an external independent investigator to look into the matter.
- The investigation will be conducted fairly, confidentially (where possible), and within a reasonable timeframe.
- The investigation may require further contact with you for clarification.
- Outcome:
- Wherever possible, and subject to legal and confidentiality restrictions, the charity will inform you of the outcome of the investigation and any action taken.
- If no action is taken, the charity will provide a clear explanation for that decision.

### C. External Reporting (If Internal Process Fails)

If you have used the internal process and reasonably believe that no appropriate action has been taken, OR if you genuinely feel unable to use the internal process (e.g., you believe the entire Trustee Board is involved), you may raise your concern with an external body.

Prescribed external bodies include:

- The Charity Commission for England and Wales (regulator for serious wrongdoing that risks significant harm to beneficiaries, assets, or reputation).
- The Police (for criminal matters, e.g., fraud or abuse).
- HMRC (for tax or financial irregularity).

You are encouraged to seek advice from an independent body, such as Protect (the whistleblowing charity), before disclosing to an external body.

## **6. Trustee Responsibilities**

The Trustee Board is ultimately responsible for this policy.

- The Trustees will ensure that any whistleblowing disclosure is properly assessed and investigated with due regard for confidentiality and the protection of the discloser.
- The Trustee Board will receive a confidential report on all whistleblowing disclosures and their outcomes, which will be kept in a confidential and secure location.

## **7. Malicious Allegations**

If, after a thorough investigation, an allegation is found to have been raised maliciously (i.e., knowingly false, or for personal gain), it will be treated as a serious disciplinary offence.

## **8. Policy Review**

This policy will be reviewed regularly by the Trustee Board to ensure it remains relevant and effective.

END OF POLICY