

# Whistle Blowing Policy

## 1. Introduction

Purple Field Productions aims to maintain the highest standards of openness, decency, integrity, and accountability in its work. Everyone who works with PFP must be vigilant for signs of wrongdoing or criminal activity by individuals or organisations working with or for PFP and is encouraged to report such behaviour using this policy. Anyone who tries to deter, intimidate, or victimise an individual in a bid to prevent them from reporting a suspicion, will be subject to appropriate formal action and, if appropriate, may be reported to the relevant authorities. The Whistleblowing process is separate from grievance procedures for employees.

## 2. Policy Statement and Purpose

This policy provides guidance to those concerned about malpractice whether in the UK or internationally.

## 3. Scope

This policy applies to

- all members of the PFP Board
- all staff contracted by PFP
- associated team-members engaged with PFP projects in the UK and internationally

## 4. What should be reported?

- Activities that breach this policy or other PFP policies (safeguarding breaches are covered through the PFP safeguarding policy)
- Criminal offences (eg fraud, bribery, corruption, money laundering, modern day slavery, supporting or involvement in terrorism)
- Failure to comply with legal obligations or regulatory requirements
- A miscarriage of justice
- Endangering someone's health and safety
- Damage to the environment
- Covering up wrongdoing
- Unethical conduct.

Individual issues (eg bullying, harassment, discrimination) should be reported under PFP's grievance policy (employees) or complaints procedure (volunteers, third parties etc)

Not reporting a suspicion when there are clear grounds for doing so could result in disciplinary action or other sanctions.

## 5. How and when to report concerns

- Concerns should be raised as early as possible.
- Safeguarding concerns will be managed through the PFP Safeguarding policy and associated procedures.
- Concerns may be raised verbally but preferably in writing or by email, giving any background and history, including relevant dates and any witnesses. In the first instance, concerns should be raised with your immediate line manager. However, if your line manager is involved in the wrongdoing or you feel unable to raise the matter with your line manager, you should report your concerns to a more senior member of the PFP team

## 6. Responding to concerns

- An investigation will be carried out by senior members of the PFP team.
- You must not investigate yourself
- Following the investigation, the whistle-blower will be informed of the outcome and what action will be taken, which may be to do nothing, follow the full disciplinary procedure and/or report to external authorities. However, the need for confidentiality may mean that you cannot be given much detail. You should treat any information you are given regarding the investigation as confidential.

- If you believe that your concern has not been dealt with properly or the wrongdoing is still going on, you should raise your concerns with a member of the PFP Board.

#### **7. Anonymity**

- Individuals are encouraged to put their name to any whistleblowing disclosures they make.
- Concerns expressed anonymously will be considered at the discretion of PFP, taking into account: the seriousness of the issues raised, the credibility of the concern, the likelihood of confirming the allegation from attributable sources.

#### **8. Confidentiality**

- PFP will treat all such disclosures in a confidential and sensitive manner.
- The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

#### **9. Reporting externally**

If, on conclusion of the investigation, the whistle-blower reasonably believes that the appropriate action has not been taken then

- in the UK he/she should report the matter to one of the following UK bodies: HM Revenue & Customs; the Financial Conduct Authority (formerly the Financial Services Authority); the Competition and Markets Authority; the Health and Safety Executive; the Environment Agency; the Independent Office for Police Conduct; and the Serious Fraud Office or
- dependent upon the nature of the allegation to other local authorities in the country in which the purported breach took place.

#### **8. Malicious reports**

- Individuals who make malicious accusations under this policy ie those which are not true, may be subject to formal action (such as disciplinary action for employees or volunteer status review process for volunteers).

#### **9. Useful contacts**

- Advice can also be obtained through the whistleblowing organisation, Protect. This organisation is UK based, but can provide advice on whistleblowing from other countries:  
Telephone +44 (0)20 3117 2520  
Email [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)  
Website <https://protect-advice.org.uk/>

Signed:

*Kevin Waldie*

Name and position: Dr Kevin Waldie, Chair of Trustees

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**This policy has been based on the VSO Global Whistleblowing policy**