
Project WordPlay CIC

Whistleblowing Policy

Document title	Whistleblowing Policy
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Applies to	All staff, freelancers, volunteers and trustees
Contact	hello@projectwordplay.co.uk

The key message

If you become aware of serious wrongdoing connected to Project WordPlay CIC, including anything that puts children at risk, involves dishonesty, or breaks the law, you have the right to raise it, and we will take it seriously. You will not be penalised for speaking up in good faith.

1. Purpose

This policy is about what to do if you become aware of a serious concern about how Project WordPlay CIC is operating, something that goes beyond a personal grievance or complaint, and touches on potential wrongdoing, harm, or breach of legal obligations.

Whistleblowing (sometimes called "making a protected disclosure") is when someone raises a concern about wrongdoing in the public interest. This policy explains what kinds of concerns qualify, how to raise them, and what protections you have when you do.

It applies to all Co-Directors, staff, freelancers, volunteers, and trustees connected to Project WordPlay CIC.

2. What is whistleblowing?

Whistleblowing is different from raising a personal complaint (such as a dispute about pay or a disagreement with a colleague). It is about concerns that affect others, the organisation, the people we work with, the public, or the integrity of public funds.

Under the Public Interest Disclosure Act 1998 (PIDA), a "protected disclosure" is a disclosure made in the public interest about one or more of the following:

- A criminal offence (past, present, or likely to occur)
- A failure to comply with a legal obligation
- A miscarriage of justice
- A danger to the health or safety of any individual
- Damage to the environment
- Deliberate concealment of any of the above

In the context of Project WordPlay CIC, concerns that would fall under this policy might include:

- Financial fraud, misuse of grant funding, or falsification of records
- Serious risk to the safety or welfare of children in our care
- Illegal discrimination or persistent serious breach of our Equal Opportunities Policy
- Significant breach of our safeguarding responsibilities
- Deliberate misconduct by a Co-Director, or freelance staff member
- Covering up any of the above

3. What this policy is not for

This policy is not the right route for:

- Personal grievances about your own employment or engagement (use our Complaints Policy or speak to a Co-Director directly)
- Disagreements about organisational decisions or strategy
- Concerns about a colleague's conduct that are better handled through a direct conversation or our Code of Conduct

If you are unsure whether your concern is a whistleblowing matter or something else, contact Protect (formerly Public Concern at Work) for free, confidential advice: 0203 117 2520 or protect-advice.org.uk.

4. Your protections

The law protects workers who make a protected disclosure in good faith. Under the Public Interest Disclosure Act 1998:

- You cannot be dismissed or subjected to any detriment as a result of raising a genuine concern
- If you suffer any negative consequence as a result of whistleblowing, you may have grounds for a claim to an Employment Tribunal

Project WordPlay CIC is fully committed to these protections. We will not tolerate any retaliation, direct or indirect, against anyone who raises a genuine concern under this policy. Anyone found to have victimised a whistleblower will face serious consequences, up to and including termination of their engagement.

Important: good faith

These protections apply to disclosures made in good faith, meaning you genuinely believe the

information to be true, even if it later turns out to be incorrect. Knowingly making a false allegation is not protected and may itself be a disciplinary matter.

5. Confidentiality

We will handle all whistleblowing concerns with as much confidentiality as possible. We will not disclose the identity of the person who raised a concern without their consent, unless we are legally required to do so or disclosure is necessary to properly investigate the matter.

We encourage people to put their name to concerns where possible, it makes investigation easier and allows us to keep you informed. However, we recognise that some situations make anonymity necessary. Anonymous concerns will still be considered, though they may be harder to investigate fully.

Please note: if your concern involves a safeguarding risk to a child, full confidentiality cannot be guaranteed, information will be shared as required to protect the child.

6. How to raise a concern

Raise your concern as soon as possible — do not wait until you have all the evidence. You are not expected to investigate the matter yourself.

Situation	Who to contact	How
Concern about a staff member, freelancer or volunteer	Either Co-Director	hello@projectwordplay.co.uk or in person
Concern involves one Co-Director	The other Co-Director	hello@projectwordplay.co.uk or in person
Concern involves both Co-Directors, or you feel unable to raise it internally	Protect (formerly Public Concern at Work)	0203 117 2520 (free, confidential) protect-advice.org.uk
Concern relates to financial fraud or misuse of public funds	Charity Commission / Companies House	Report to the relevant regulator directly
Concern involves a safeguarding matter	Follow the Safeguarding Policy in the first instance	Speak to the designated safeguarding lead

You can raise a concern verbally or in writing. If in writing, please include:

- A description of the concern including what happened, when, and who was involved
- Any evidence you have, or the names of others who may have relevant information
- Your contact details (unless raising anonymously)

You do not need to use any formal language or follow a particular format. What matters is that the concern is clearly communicated.

7. What happens after you raise a concern

We will acknowledge receipt of your concern within five working days.

The person receiving the concern will:

- Assess whether it falls within the scope of this policy
- Decide on the appropriate course of action — which may include an internal investigation, referral to an external body, or both
- Keep you informed of progress, subject to any confidentiality requirements

Timescales will depend on the nature and complexity of the concern. We will aim to provide an initial response on the outcome or next steps within 28 days. Where this is not possible, we will explain why and give a revised timescale.

Not every concern will result in formal action — but every concern will be taken seriously and responded to. If no action is taken, we will explain the reasons.

8. External disclosure

In most cases, concerns should be raised internally first, in line with this policy. However, there are circumstances in which going directly to an external body is appropriate or necessary. These include where:

- The concern involves both Co-Directors and there is no independent internal route
- You have already raised the concern internally and it has not been addressed
- You have reasonable grounds to believe that evidence will be concealed or destroyed
- The matter is exceptionally serious

Relevant external bodies may include:

- Protect (formerly Public Concern at Work) — free, confidential whistleblowing advice: 0203 117 2520
- The Charity Commission — for concerns about misuse of charitable funds or serious governance failures
- Companies House — for concerns about company law breaches
- The Information Commissioner's Office (ICO) — for data protection breaches
- The police — for criminal matters
- Ofsted or the local authority — for safeguarding concerns involving children

Going to the press or social media is generally not a protected disclosure unless specific conditions are met. If you are considering this, please seek legal advice first.

9. Responsibilities

9.1 Co-Directors

Both Co-Directors (Sophie Beckinsale and Nicki Watts) are jointly responsible for:

- Ensuring this policy is communicated to all staff, freelancers, volunteers, and trustees
- Receiving and responding to concerns raised under this policy
- Ensuring anyone who raises a concern in good faith is protected from retaliation
- Reviewing and updating this policy annually

What if the concern is about a Co-Director?

Project WordPlay CIC is led by two Co-Directors. If your concern is about one Co-Director, please raise it with the other. If it involves both Co-Directors, or if you feel unable to raise it internally for any reason, contact Protect directly on 0203 117 2520. They can advise you confidentially on the best course of action.

9.2 All staff, freelancers and volunteers

Everyone working with Project WordPlay CIC has a responsibility to:

- Raise concerns about serious wrongdoing in good faith and without delay
- Cooperate honestly with any investigation
- Not interfere with, discourage, or retaliate against anyone raising a concern

10. Record keeping

We will keep a confidential written record of all concerns raised under this policy, including the nature of the concern, the action taken, and the outcome. These records will be held securely and reviewed periodically to identify any patterns or systemic issues.

11. Related policies

- Safeguarding & Child Protection Policy
- Code of Conduct
- Complaints Policy
- Conflict of Interest Policy
- Data Protection & Privacy Policy

12. Policy review

This policy will be reviewed annually or following any use of the whistleblowing procedure. The current version will be available at www.projectwordplay.co.uk.