



DIVINE BUZZ – WHISTLEBLOWING POLICY

This policy is aligned with the Employment Rights Act 1996 & Public Interest Disclosure Act 1998

1. Our Commitment

Divine Buzz is committed to operating with **honesty, integrity, transparency, and accountability**. We expect the same high standards from all staff, contractors, and volunteers.

We recognise that, on rare occasions, something may go wrong. When this happens, individuals must feel safe and supported to raise genuine concerns. This policy provides a clear, confidential, and fair process for doing so.

Divine Buzz encourages a culture where concerns can be raised early, without fear of victimisation or reprisal.

2. Aim of the Policy

This policy aims to:

- Provide a safe and effective way to raise serious concerns
- Ensure individuals receive appropriate feedback on actions taken
- Protect individuals who raise concerns in good faith
- Signpost further options if internal processes are unsuitable or unsatisfactory
- Enable Divine Buzz to act where allegations are malicious or made in bad faith

3. Who This Policy Applies To

This policy applies to:

- Directors
- Managers
- Staff
- Contractors
- Volunteers

It covers anyone working for or on behalf of Divine Buzz.



4. What is Whistleblowing?

Whistleblowing is when an individual raises a concern about **wrongdoing in the public interest** within an organisation. This is known as a **protected disclosure**.

Examples include concerns about:

- How funds are raised or used
- Treatment of staff, contractors, volunteers, or participants
- Safeguarding failures
- Fraud, corruption, or malpractice
- Health and safety risks
- Environmental damage
- Breaches of legal obligations
- Attempts to conceal wrongdoing

A concern is in the **public interest** when it affects more than one person or has a wider organisational or community impact.

Whistleblowing is **not** the same as a personal grievance (see Section 7).

5. Protecting Individuals Who Raise Concerns

The Employment Rights Act 1996 (as amended by PIDA 1998) protects workers who make **protected disclosures**.

A disclosure is protected when:

1. The individual **reasonably believes** the information shows wrongdoing
2. The concern is raised **in the public interest**
3. The disclosure is made through appropriate channels (internal or authorised external bodies)

Examples of protected concerns include:

- Criminal offences (e.g., fraud, theft, corruption)
- Miscarriages of justice
- Health and safety risks
- Environmental harm
- Breaches of legal obligations
- Deliberate concealment of wrongdoing

Individuals do **not** need proof—only a reasonable belief that wrongdoing is occurring or likely to occur.



Protection from Detriment

Anyone raising a concern in good faith will be protected from:

- Dismissal
- Disciplinary action
- Bullying or harassment
- Victimisation
- Any other detriment

Divine Buzz will take action against anyone who retaliates against a whistleblower.

Volunteers and Contractors

Although volunteers and contractors do not have the same statutory protection as employees, Divine Buzz commits to treating all individuals raising concerns **in the spirit of PIDA**.

6. Malicious or False Disclosures

If an individual knowingly makes a false allegation, acts maliciously, or is involved in the wrongdoing they report, this may be addressed under the appropriate Divine Buzz policy (e.g., disciplinary, conduct, or volunteer management procedures).

7. Concerns Not Covered by This Policy

This policy is for **serious concerns in the public interest**.

Other issues should be raised through the appropriate Divine Buzz policies, such as:

- Disciplinary and Grievance Policy
- Safeguarding and Child Protection Policy
- Anti-Bullying and Harassment Policy
- Health and Safety Policy

If unsure which policy applies, individuals may seek advice before raising a concern.

8. How to Raise a Concern

Concerns should be raised **as early as possible**.



While oral disclosures are accepted, **written disclosures are preferred** as they provide a clear record.

A disclosure should include:

- Background and context (dates, locations, names)
- Why the situation is concerning
- A statement that the concern is being raised under the Whistleblowing Policy
- Whether confidentiality is requested

Divine Buzz will make every effort to maintain confidentiality, but this cannot always be guaranteed. If confidentiality cannot be maintained, the individual will be informed.

Anonymous disclosures will be considered, but they may limit the ability to investigate or provide feedback.

9. Who to Raise the Concern With

Concerns should normally be raised with the **Manager**.

If the Manager is involved in the alleged wrongdoing, or if raising it with them is inappropriate, concerns should be raised directly with the **Directors**.

Where necessary, the Directors may appoint an **external, independent investigator**.

10. What Happens After a Concern is Raised

- All disclosures will be acknowledged within **five working days**
- An initial assessment will be carried out
- A meeting may be arranged (preferably away from the workplace)
- The individual will be informed of the next steps

Possible outcomes include:

- No further action
- Action under another Divine Buzz policy
- An internal investigation under this policy
- Referral to the police or statutory bodies
- Referral to external auditors
- An independent inquiry

Divine Buzz aims to resolve concerns **promptly and fairly**.



11. Raising a Concern Externally

If an individual is dissatisfied with the internal response, or if internal reporting is inappropriate, they may raise concerns with an authorised external body such as:

- HM Revenue & Customs
- Health and Safety Executive
- Environment Agency
- Fundraising Regulator
- Charity Commission
- Police or safeguarding authorities

Divine Buzz may also make referrals to these bodies where required.

12. Disclosures to the Press

Disclosing concerns to the media is rarely justified and may be considered **misconduct**.

Divine Buzz expects individuals to use internal or authorised external channels first. Unreasonable public disclosure may result in action under the Grievance and Disciplinary Policy.

13. Further Help and Independent Advice

Individuals may seek confidential, independent advice at any stage from:

Protect (formerly Public Concern at Work)

A charity offering free legal and practical advice on whistleblowing.

Phone: 020 3117 2520

Website: <https://protect-advice.org.uk> (protect-advice.org.uk in Bing)

Divine Buzz – Ellen Otchere

Signature:

Email: Divinebuzz

Contact details: **07951922324**

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