



POLICIES & PROCEDURES

Pyramid of Arts

Whistleblowing Policy

What is 'whistleblowing'?

'Whistleblowing' means speaking out when you believe an organisation that you work for is doing something illegal or unethical.

Examples

- The misuse of funds (e.g. theft, fraud)
- Failure to comply with a legal obligation or governing documents
- Putting people or the environment at risk of harm
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

This policy is designed to enable workers and volunteers to raise concerns

- internally
- at a high level (to the Director and Trustees)
- which the individual believes shows malpractice or impropriety
- which are in the public interest and may require external investigation

Pyramid of Arts is committed to the highest standards of openness, honesty and accountability.

If a worker or volunteer at Pyramid of Arts has serious concerns about anything that is happening in the organisation, these concerns should be reported and the person should not be worried about getting into trouble for speaking out.

The Public Interest Disclosure Act (1999) gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Equally, Pyramid of Arts is committed to extending this protection to all its members.

If, for any reason, you feel that you may need to follow the whistleblowing procedure, we recommend that you read both the **Grievance Policy** and the **Complaints Procedure** before taking any action, as these may be more appropriate channels for pursuing the matter you wish to raise.

Safeguards

1 Protection

This policy is designed to offer protection to members who disclose such concerns provided the disclosure is made:

- in good faith (you believe it is true)
- to an appropriate person (see below)
- following the guidance given here

2 Confidentiality

Pyramid of Arts will treat any disclosure confidentially and with sensitivity. However, the identity of the person making an allegation may be revealed:

- if the source of the information is required as part of the investigation
- if the person needs to provide a statement as evidence

3 Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously can be perceived with much less credibility, but they may be considered at the discretion of the Company.

In exercising this discretion, the factors to be taken into account will include:

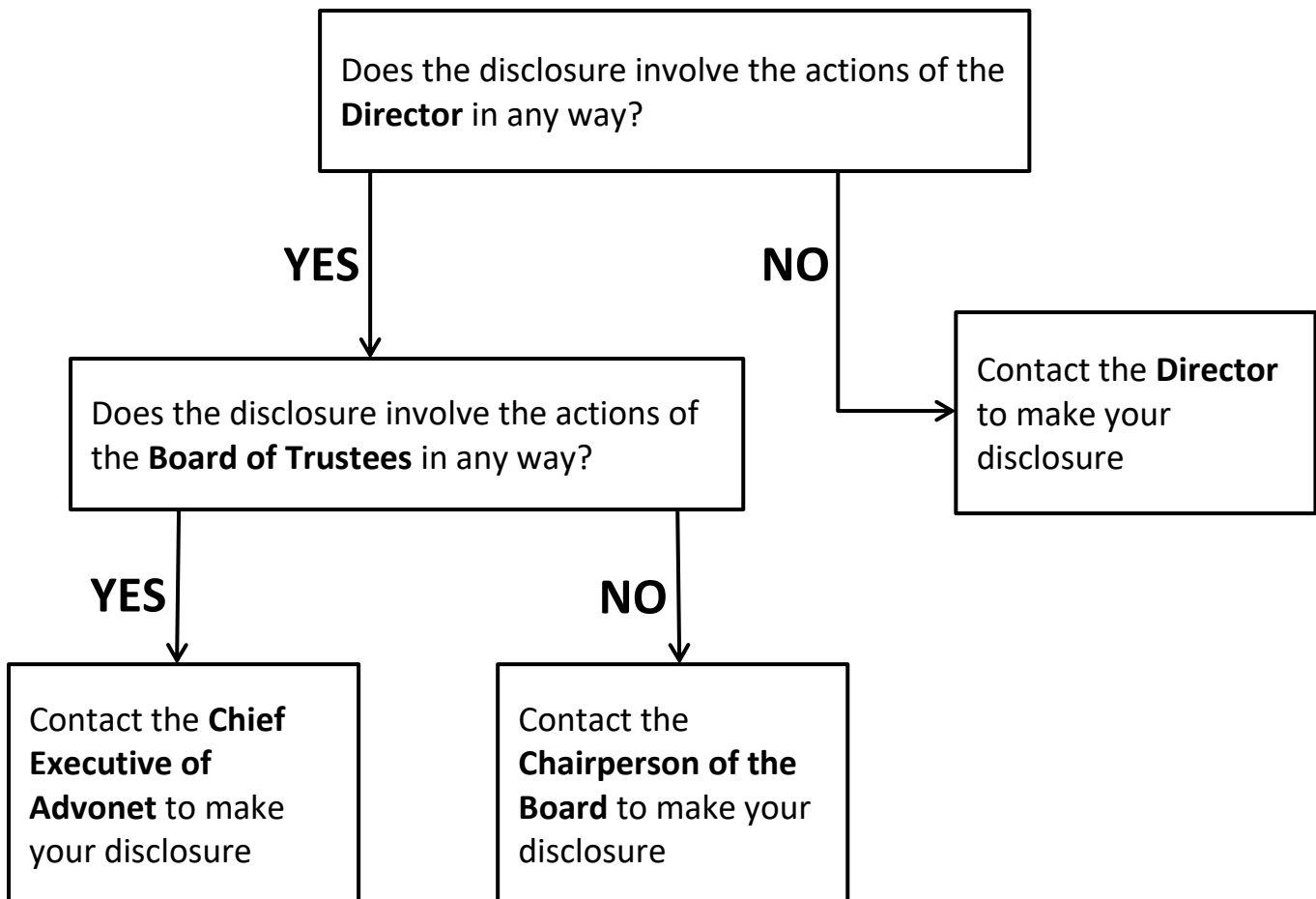
- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable (not anonymous) sources

4 Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual.

If an individual makes a malicious allegation (deliberately tells a lie), disciplinary action may be taken against that individual.

Procedures for Making a Disclosure



Contact Information

If possible, it is best to put your disclosure in writing. Make sure you write on the envelope "PRIVATE AND CONFIDENTIAL" – this means that nobody else will open the letter.

Contact the Director or Chair of the Board:

WRITE

The Director / Chair of the Board
Pyramid of Arts
Unit 668B Barkston House
Croydon Street, Leeds LS11 9RT

PHONE

0113 234 6040 (Director)
07974 174739 (Chair)

Contact the Chief Executive of Advonet:

WRITE

The Chief Executive
Advonet
Unity Business Centre, 26 Roundhay
Road
Leeds LS7 1AB

PHONE

0113 244 0606

What will happen next?

An investigation will take place to find out if the allegations are true.

The Director or Chair of the Board can choose somebody to investigate, or they can conduct the investigation themselves.

If the disclosure has been made to Advonet, they will notify the relevant authorities to come and investigate.

If the disclosure includes allegations of criminal activity, the police will be notified and they will conduct their own investigation.

Pyramid of Arts' staff and members will be expected to cooperate fully in any investigation that takes place.

How long will it take?

This depends on the nature of the disclosure. The investigating officer will act as quickly as possible but must ensure that they are thorough.

The investigating officer will write to the person who made the disclosure to explain what is happening, and will keep them updated throughout – including a final letter to explain any decisions or outcomes.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies (e.g. police)
- A judgement concerning the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Director / Chair of the Board as appropriate
- The Director / Chair of the Board will decide what action to take (e.g. start disciplinary procedures)
- If appropriate, a copy of the outcomes will be passed to the trustees to enable a review of the procedures

If the problem is still not resolved

If the person making the disclosure is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise this issue in confidence with the Director / Chair of the Board, or Advonet.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, Pyramid of Arts recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive or Charity Commission).