



WHISTLEBLOWING POLICY AND PROCEDURE

Policy Statement

KidsAid is committed to openness, integrity, and accountability in all areas of its work. Any individual connected with KidsAid, whether a trustee, staff member, therapist, volunteer, beneficiary, family member, or member of the public, should be able to raise concerns about wrongdoing or risk without fear of reprisal.

KidsAid expects all individuals acting on behalf of the organisation to uphold the highest standards of honesty and to comply with all legal, regulatory, and ethical requirements.

Trustees hold collective responsibility for ensuring this policy remains effective and is reviewed annually.

Aims of the Policy

The purpose of this policy is to:

- Provide a clear and safe process for raising concerns about wrongdoing or risks connected to KidsAid.
- Encourage concerns to be raised at the earliest opportunity, with the assurance they will be taken seriously, treated with respect, and investigated appropriately.
- Assure all those connected with KidsAid that they can raise genuine concerns in the public interest without fear of victimisation, reprisal, or disadvantage, even if concerns are mistaken.
- Support KidsAid in meeting its legal and regulatory responsibilities, including those set out by the Charity Commission and other relevant regulators.

This policy does not form part of any contract of employment, therapist contract, consultancy agreement, or volunteer agreement, and may be amended at any time.

Scope and Definitions

For the purposes of this policy, the term “personnel” is used to ensure clarity and consistency across all roles within KidsAid.

“Personnel” means any individual acting on behalf of KidsAid in any capacity, including trustees, the CEO, the senior leadership team, managers, staff, therapists, volunteers, contractors, agency workers, and any other person engaged by or representing KidsAid in a paid or unpaid role.

This policy applies to all personnel in relation to the reporting of wrongdoing, risk, or misconduct.

1. Responsibilities of KidsAid Personnel

All personnel must ensure they understand and comply with this policy.

Personnel are responsible for:

- Acting with honesty and integrity at all times.
- Raising concerns promptly where there is knowledge or suspicion of wrongdoing, malpractice, or unethical conduct.
- Reporting concerns through the appropriate internal reporting channels in line with this policy.
- Cooperating fully with any whistleblowing investigation where required.

The CEO and Board of Trustees holds overall responsibility for ensuring this policy is effectively implemented, that appropriate reporting mechanisms are in place, and that whistleblowing concerns are addressed independently, appropriately, and without delay.

The senior leaders are responsible for ensuring that this policy is embedded across the organisation, that personnel are aware of reporting procedures, and that all concerns raised are escalated and managed appropriately and without detriment to the individual raising the concern.

Whistleblowing concerns will be assessed and investigated by appropriately authorised individuals, which may include the Safeguarding and Clinical Lead, the Deputy CEO, the CEO, a nominated Trustee, or the Chair of the Board, depending on the nature and severity of the concern raised.

2. Definition of Whistleblowing

Whistleblowing is when a person raises a concern about suspected wrongdoing or risks that affect others and are in the public interest. Examples include:

Legal and regulatory breaches

- Criminal activity, fraud, or misuse of funds.
- Breaches of law, regulation, or professional standards.
- Attempts to deliberately cover up wrongdoing.

Health, safety, and welfare

- Risks to health, safety, or welfare of trustees, staff, therapists, volunteers, service beneficiaries, or others.
- Negligence or environmental damage.

Safeguarding and conduct

- Sexual or physical abuse of clients or adults at risk.
- Breaches of internal policies or codes of conduct.
- Behaviour that damages or risks damaging the Charity's reputation.

2.1 Safeguarding

Any concern relating to a child or adult at risk must be escalated immediately in line with KidsAid's Child Protection and Safeguarding Policy and Safeguarding Adults Policy and Procedure.

"Disclosures relating to sexual harassment are protected whistleblowing disclosures under the Employment Rights Act (from April 2026). KidsAid will treat such disclosures as protected and will provide appropriate safeguards for workers who report them." This means that workers who report sexual harassment are legally protected from detriment and unfair dismissal.

- Disclosures may relate to harassment that has occurred, is occurring, or is likely to occur.
- A disclosure can qualify even if the incident is framed within a broader safeguarding concern or workplace risk.
- KidsAid will treat all sexual harassment disclosures as protected and will support anyone raising such concerns.

Where a concern relates specifically to an allegation or safeguarding concern about a member of personnel, it will be managed in accordance with the Managing Safeguarding Allegations Against Personnel Procedure.

3. Protection for Whistleblowers

Under UK whistleblowing legislation, statutory protections apply to employees, workers, agency workers, and certain contractors. While volunteers and trustees are not legally classified as workers, KidsAid recognises that similar risks may arise when raising concerns and is committed to providing equivalent internal safeguards.

All individuals who raise concerns in good faith, including matters relating to wrongdoing, risk, misconduct, or sexual harassment, are protected from detriment, retaliation, or victimisation as a result of making a disclosure or participating in an investigation.

Any individual found to have subjected another person to retaliation, victimisation, or detriment for raising a concern will be subject to action under the Disciplinary Policy, in accordance with the Harassment and Bullying Policy and associated procedures.

4. Raising a Whistleblowing Concern

Anyone can raise a concern about KidsAid. This includes KidsAid personnel, beneficiaries, family members, or members of the public.

4.1 Internal Reporting

Where concerns arise, KidsAid personnel should normally raise these in the first instance with a line manager, or most appropriate senior contact within the organisation, unless this is not appropriate or there is a reasonable concern about doing so.

Concerns may be raised verbally or in writing. The line manager or most appropriate senior contact may be able to resolve the matter directly or may escalate it to the CEO, where appropriate.

Where a line manager or most appropriate senior contact is unable to address the concern, or where raising the concern with them is not appropriate, concerns should be raised with one of the following:

- CEO: Rebecca Caswell-Fox.
- Chair of Trustees: Trevor Pearce.
- External independent whistleblowing advice service: Protect

Individuals who are not KidsAid personnel (including members of the public) may also raise concerns directly with the organisation. In such cases, concerns will be managed through a similar internal process where appropriate. Legal protections under the Public Interest Disclosure Act 1998 may not apply to disclosures made by members of the public.

4.2 External Reporting

In some circumstances, it may be appropriate to raise a concern externally. This may include situations where:

- The concern is of a serious nature.
- There is a belief that internal reporting routes are not appropriate or have not resulted in a satisfactory response.

External reporting bodies may include:

- The Charity Commission.
- The British Association of Counselling and Psychotherapy.
- The Fundraising Regulator.
- The Information Commissioner's Office (ICO).
- Protect – independent confidential whistleblowing advice service.

Direct reporting to the media is rarely appropriate, except in exceptional circumstances where other routes have been exhausted or are not reasonably available.

5. Confidentiality

KidsAid encourages open reporting wherever possible. However:

- The identity of the individual raising a concern will be kept confidential wherever possible.
- Anonymous reports will be considered and investigated where feasible, although the ability to gather evidence may be limited.
- Protect provides a fully independent and confidential external service, which can be accessed without the need to provide a name or contact details.

6. Investigation and Response Procedure

When a concern is raised:

1. Receipt will be acknowledged as soon as possible and within 7 working days, unless the concern has been raised anonymously.
2. An initial assessment will be undertaken as soon as possible and within the same timeframe to determine the appropriate course of action.
3. Further information may be requested, and a meeting may be arranged where appropriate. A colleague or supporter may accompany the individual raising the concern.
4. Where a full investigation is required, this will be conducted by an appropriately qualified and authorised individual.
5. Recommendations may be made to address the issue and prevent recurrence.
6. Updates on progress will be provided where possible, subject to legal and confidentiality constraints.
7. Where concerns are not upheld, no action will be taken against the individual provided the concern was raised in good faith.

Where a concern is not upheld, no penalty will be applied where it has been raised in good faith. Malicious or deliberately false allegations may result in further action.

Investigations may be escalated to the Charity Commission where risks meet relevant regulatory thresholds.

Investigations may be escalated to the Charity Commission if risks meet regulatory thresholds.

7. If Concerns Remain Unresolved

If there is dissatisfaction with how a concern has been handled, the matter may be raised with the CEO or the Chair of Trustees. Contact may also be made with Protect or, in serious cases, the Charity Commission or another relevant regulator.

8. Protection and Support for Whistleblowers

KidsAid does not tolerate any form of victimisation, retaliation, or discrimination against any individual who raises a genuine concern.

Where an individual believes they have been treated unfairly as a result of raising a concern, this should be reported to the CEO or, where more appropriate, the Chair of Trustees. KidsAid personnel may also access the Grievance Procedure.

9. Contacts

Role	Name	Email / Website
Clinical Lead / Safeguarding Lead	Carla Mangan	carla@kidsaid.org.uk
Deputy CEO	Geoff Russell-Jones	geoff@kidsaid.org.uk
CEO	Rebecca Caswell-Fox	rebecca@kidsaid.org.uk
Chair of Trustees	Trevor Pearce	chair@kidsaid.org.uk
Independent Whistleblowing Charity	Protect	Protect - Speak up stop harm

10. Review

This policy will be reviewed periodically by the CEO or earlier if changes in law, regulation, or best practice require it.

Records will be kept securely and confidentially, in line with data protection requirements.