



Regulation 5.2 – Whistleblowing Policy

Effective date: June 2025

Acknowledgements

MUSC CIC would like to express our thanks to the following organisations who have assisted in the development of this policy

POLICY STATEMENT

with honesty, integrity and accountability. The organisation recognises that, from time to time, situations may arise where individuals become aware of wrongdoing, unsafe practice or misconduct that could place people at risk, damage public trust or undermine the organisation's values.

MUSC CIC is committed to fostering a culture of openness where staff, volunteers and others feel confident to raise concerns in the public interest. This policy provides a clear and safe framework for reporting such concerns and confirms that individuals who raise genuine concerns in good faith will be supported and protected from retaliation.

1. INTERPRETATION

For the purposes of this regulation, whistleblowing refers to the disclosure of information which an individual reasonably believes demonstrates wrongdoing, malpractice or risk in the public interest. This may include criminal activity, safeguarding failures, danger to health and safety, financial misconduct, failure to comply with legal or regulatory obligations, misuse of organisational resources, discrimination, data protection breaches, unethical conduct or the deliberate concealment of any such matters.

A whistleblower is any person who raises a genuine concern in good faith under this policy. This policy applies to MUSC CIC directors, staff, volunteers, contractors, consultants, partners and any person acting on behalf of MUSC CIC.

2. SCOPE

This policy applies to concerns arising in connection with MUSC CIC's governance, operations, events, training activities, competitions, safeguarding responsibilities, financial management and partnerships. It applies across all levels of the organisation.

This policy is not intended to be used for personal employment grievances or complaints relating solely to an individual's own working conditions. Such matters should be raised through MUSC CIC's grievance or complaints procedures unless the issue is clearly in the public interest.

3. PURPOSE OF THE POLICY

The purpose of this policy is to encourage individuals to report concerns as early as possible, to provide clear guidance on how to raise concerns, and to reassure individuals that they can do so without fear of victimisation, harassment or disadvantage, even where concerns later prove to be unfounded, provided they were raised in good faith.

4. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

MUSC CIC is committed to protecting individuals who raise concerns in accordance with this policy. No individual will be subject to retaliation, harassment, victimisation or disadvantage because of raising a genuine concern in the public interest. Any person found to have retaliated against a whistleblower may be subject to disciplinary action.

Where an individual believes they have suffered detrimental treatment as a result of whistleblowing, this should be reported immediately to a member of the MUSC CIC Board so that appropriate action can be taken. MUSC CIC will provide reasonable support to whistleblowers throughout the process.

5. CONFIDENTIALITY AND ANONYMITY

All whistleblowing concerns will be treated sensitively and confidentially so far as

reasonably practicable. MUSC CIC will make every effort to protect the identity of the whistleblower if this is their wish. However, there may be circumstances where anonymity cannot be fully maintained, particularly if further investigation, disciplinary proceedings or safeguarding action requires the whistleblower's involvement.

Concerns may be raised anonymously. Anonymous disclosures will be considered at the discretion of MUSC CIC, considering the seriousness of the issue, the credibility of the information provided and the likelihood of being able to investigate the concern effectively without further clarification.

6. RAISING A CONCERN

Concerns should be raised as soon as possible to enable appropriate action to be taken. A whistleblowing concern may be raised verbally or in writing and should include sufficient detail to allow the matter to be understood and assessed, including the nature of the concern, relevant background, dates, individuals involved and any supporting evidence where available.

Concerns should normally be raised with a line manager, event lead or designated senior representative. Where this is not appropriate, or where the concern involves senior personnel, the concern may be raised directly with a member of the MUSC CIC Board or the Chair.

7. INVESTIGATION AND RESPONSE

All whistleblowing concerns will be acknowledged and assessed promptly. MUSC CIC will determine whether an investigation is required and, if so, the most appropriate form that investigation should take. Investigations may be conducted internally or, where appropriate, referred to external bodies, safeguarding authorities, regulators or the police.

Where possible and appropriate, the whistleblower will be informed of how the matter is being handled and whether further investigation will take place, subject to legal and confidentiality constraints. MUSC CIC will aim to keep whistleblowers informed of progress, recognising that full details cannot always be shared.

8. SAFEGUARDING AND IMMEDIATE RISK

Where a whistleblowing concern relates to the safety or welfare of a child, young person or vulnerable adult, MUSC CIC will treat the matter as a safeguarding concern and act immediately in accordance with its Safeguarding Policy. This may include referral to local authority safeguarding services or emergency services without delay.

9. EXTERNAL DISCLOSURE

MUSC CIC encourages individuals to use this internal policy wherever possible. However, the law recognises that in certain circumstances it may be appropriate to raise concerns with external bodies such as regulators, safeguarding authorities or law enforcement agencies.

Individuals are strongly encouraged to seek independent advice before making an external disclosure to ensure that they remain protected under whistleblowing legislation. Independent whistleblowing advice services and prescribed regulators are available to provide guidance.

10. MALICIOUS OR VEXATIOUS ALLEGATIONS

While MUSC CIC encourages openness and transparency, concerns that are found to be deliberately false, malicious or raised in bad faith may be subject to disciplinary action. This does not apply to concerns raised honestly that are not substantiated following investigation.

11. RECORD KEEPING

MUSC CIC shall maintain secure and confidential records of all whistleblowing concerns and investigations in accordance with data protection requirements. Access to such records shall be restricted to authorised persons only.

12. REVIEW AND COMPLIANCE

This policy shall be reviewed periodically by the MUSC CIC Board to ensure it remains effective, compliant with legislation and appropriate to the organisation's activities. Failure to comply with this policy may be treated as a breach of MUSC CIC governance standards and codes of conduct.

13. RELATED DOCUMENTS

This policy should be read in conjunction with MUSC CIC's Volunteer & Staff Code of Conduct, Safeguarding Policy, Data Protection & GDPR Policy, Complaints Procedure and Disciplinary Procedures.