



# Whistleblowing Policy

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### CONTENTS

1	Purpose.....	1
2	Policy Aims.....	1
3	Legislation .....	2
4	Scope.....	2
5	Definitions and Scope of Procedure.....	2
6	Principles.....	3
7	Procedure.....	3
7.1	Reporting of Concerns or Malpractice.....	3
7.2	Ex Employees.....	3
7.3	Responding to Concerns.....	4
8	Protection.....	5
9.	Escalating Concerns.....	5
10	Roles and Responsibilities.....	5
11	Monitoring and Review.....	6
12	Links to Relevant Policies.....	7
13.	Appendix: Useful Contacts.....	8

### 1. Purpose

The KORU Project is committed to providing a supportive and high-quality work environment for all employees, students, volunteers and freelance staff, and to ensuring excellence in practice and safeguarding for clients. The KORU Project CIC is proud of its strong ethical culture which forms the foundation for daily business conduct.

The KORU Project CIC takes any reported concern of malpractice seriously. All individuals working in the organisation are encouraged to report any concerns as soon as possible so that they can be dealt with in an appropriate manner, ensuring the safety and well-being of service users and KORU Representatives.

No individual should continue to work under unacceptable circumstances or be forced to leave the organisation due to inappropriate working practices. It is important to report all incidents at an early stage so that a satisfactory solution may be sought, to the benefit of all individuals, service users, and the company. The purpose of this whistleblowing procedure is to provide a robust process for reporting and managing evidence of misconduct or malpractice and to establish clear procedures and responsibilities for dealing with any such complaints in a professional manner.

This policy will provide a clear and supportive framework for KORU Representatives to raise concerns either within the organisation or externally, where appropriate. It will outline the organisation's responsibility to deal properly and sensitively with any issues or allegations of wrongdoing raised by individuals.

KORU Representatives are encouraged to raise any genuine concerns they may have relating to the areas outlined in this policy by following the procedure set out in this document. All raised concerns will be managed professionally and in confidence.

Individuals can report their concerns by following the whistleblowing procedure detailed in section 7 of this policy.

### 2. Policy Aims

This policy aims to:

- Encourage individuals to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected.
- Let all representatives of The KORU Project CIC know how to raise concerns about potential wrongdoing in or by the organisation.
- Set clear procedures for how The KORU Project CIC will respond to such concerns.
- Ensure KORU Representatives are aware of the protection available to them if they raise a whistleblowing concern.
- Assure KORU Representatives that they will not be unfairly blamed or victimized for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).

### 3. Legislation

The KORU Project CIC recognises and operates in accordance with the Public Interest Disclosure Act 1998, which offers a framework of protection against victimisation or dismissal for employees who expose impropriety at work. The Act provides protection for individuals who make disclosures regarding certain categories of malpractice (see chapter 4) according to the disclosure procedures laid down by the legislation.

This whistleblowing procedure has been written with [government guidance on whistleblowing](#) and the policy complies with the KORU Project CIC's funding agreement and articles of association.

### 4. Scope

This policy does not form part of any employee's contract of employment and may be amended at any time. This policy applies to all representatives of The KORU Project CIC (referred to in this policy as KORU Representatives). This includes freelance therapists, mentors, employees, volunteers, trainees, and students.

### 5. Definitions and Scope of Procedure

The Nolan Committee on Standards in Public Life defines whistleblowing as 'raising concerns about misconduct within an organisation or within an independent structure associated with it'. Whistleblowing also covers concerns made that report wrongdoing that is in the public interest. This procedure provides a framework for individuals to raise genuine concerns related to the belief that The KORU Project CIC or any member of the organisation has taken, is intending to take, or has failed to take actions which the individual reasonably believes will lead or amount to one of the following:

- a criminal offence, such as fraud, exploitation, or corruption
- a failure to comply with any legal obligations or statutory requirements
- a miscarriage of justice
- danger to the health and safety of any individual
- a breach of financial management procedures
- damage to the environment or
- the deliberate concealment of information tending to show any of the matters listed above.

A whistleblower is a person who raises a genuine concern relating to the above.

Not all concerns raised about an organisation are considered as whistleblowing.

Issues such as bullying, or harassment must be addressed in the first instance, using the procedure set out in the KORU Anti-Bullying Policy.

If advice is needed to help decide which procedure to follow, PROTECT, previously titled 'Public Concern at Work' offers online or telephone support:

- [Further guidance](#) on the difference between a grievance or whistleblowing concern.
- A free and confidential [advice line](#).

### 6. Principles

The KORU Project CIC supports children, adults and families who are often categorized as at risk. It is imperative that all KORU Representatives adopt a culture of raising and discussing concerns, in an appropriate manner, in order to ensure best practice and the safety and well-being of all service users and KORU Representatives.

The KORU Project CIC believes that good communications amongst individuals at all levels promotes better business practice and a safer framework for children, adults and families accessing support through the organisation.

The KORU Project CIC is committed to ensuring that genuine concerns raised within the terms of this procedure will be treated seriously and in accordance with the procedures set out in [paragraph 7](#).

### 7. Procedure

KORU Representatives should follow internal procedures before raising issues with any external bodies.

However, if a KORU Representative is concerned about how child protection is being handled within the KORU Project CIC or another organisation, then it is advised that the NSPCC whistleblowing helpline is contacted for free advice and support: 08000 280285.

If there is an immediate risk to the safety of a service user or KORU Representative, the KORU Representative must contact 999 and follow the KORU Safeguarding and Child Protection Procedure and/or Safeguarding Adults Procedure.

#### 7.1 Reporting of Concerns or Malpractice

In all cases, if an individual genuinely believes that The KORU Project CIC or any of its representatives has taken, or is intending to take, or has failed to take actions covered in this document, they are encouraged to report this information to The KORU Project DSL. If the concern applies to The KORU Project DSL or it is believed they may be involved in the wrongdoing in some way, The KORU Representative should report their concern to the KORU Director. If both the KORU DSL and Director are subject to concern, KORU Representatives should raise their concerns with the County Designated Officer (formally known as LADO).

KORU Representatives should consider the examples in section 5 when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory or trust procedures, put people in danger or was an attempt to cover any such activity up.

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. KORU Representatives raising a concern should also include details of any personal interest in the matter. KORU Representatives must follow the Safeguarding and Child Protection Procedures and Safeguarding Adults Procedures in addition to any whistleblowing actions.

#### 7.2 Ex-Employees

The procedure also applies to KORU Representatives who have left The KORU Project CIC. A complainant can choose to contact the relevant individual as stated in paragraph 7.1 by email, confidential letter, memo, telephone, or private meeting.

### 7.3 Responding to Concerns

It is important that any concerns and complaints are dealt with sensitively and quickly. The KORU Project CIC will promptly investigate any allegations made under this procedure and will take whatever action it considers appropriate. The assistance of the individual making the concern/ complaint may be requested where possible during the investigation. It is understood this may not always be possible.

Where a meeting to discuss the complaint is held, the KORU Representative has a right to be accompanied by a fellow worker or recognised trade union representative. All allegations will be taken seriously, and the complainant will be informed of the outcome of the investigation as soon as practicable.

A complainant can choose to make a complaint by email, confidential letter, memo, telephone, or private meeting.

#### **Investigating the concern:**

When a concern is received by the KORU DSL/ Director, referred to from here as the 'recipient', they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative.
- Record as much detail as possible about the concern at this meeting. If it becomes apparent that the concern is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy/procedure.
- Reiterate that the complainant is protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken.
- Establish whether there is sufficient cause to warrant further investigation. If there is:
  - The recipient should then arrange a further investigation into the matter, involving the DSL/ Director and/or chair of trustees if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police.
  - The person who raised the concern should be informed of how the matter is being investigated and given a time frame for when they will be informed of the next steps.
  - The recipient will contact the County Designated Officer to inform them of the concern and to prepare for further action.

#### **Outcome of the investigation:**

Once the investigation, whether this was just the initial investigation of the concern, or whether further investigation was needed/ is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified, and whether a referral is required to an external organisation, such as the Local Designated Officer, local authority, and/or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the DSL, Director, trustees and other KORU Representatives if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst The KORU Project CIC cannot always guarantee the outcome sought, the organisation will strive to deal with concerns fairly and in an appropriate way.

### 8. Protection

KORU Representatives are encouraged to raise issues of concern and will be protected from detriment or dismissal for reasons relating to the disclosure if:

- they reasonably believe that the nature of the concern relates to any of the areas set out in section 5.
- and
- the information is disclosed in good faith to the person specified in paragraph 7.1 in accordance with this procedure.

The KORU Project CIC will take appropriate action against any individual:

- Found to be victimising another individual for using this procedure.
- Found to be deterring any individual from reporting genuine concerns under this procedure.
- Making a malicious or vexatious disclosure/allegation
- Making a disclosure where there were no reasonable grounds for believing that the information supplied was accurate.

Where appropriate, disciplinary action may be taken against a KORU Representative that could result in dismissal or termination of contract.

### 9. Escalating Concerns

The KORU Project CIC encourages KORU Representatives to raise their concerns internally, in line with section 7 of this policy, but recognises that KORU Representatives may feel the need to report concerns to an external body. A list of prescribed bodies to whom KORU Representatives can raise concerns with is included [here](#).

The Protect advice line, linked in section 5 of this policy, can also support KORU Representatives when deciding whether to raise the concern with an external party.

### 10. Roles and Responsibilities

All KORU Representatives have a responsibility to raise genuine concerns regarding matters covered by this procedure in accordance with the procedure outlined above. The individual is also required to act in good faith and should reasonably believe the information and any allegations to be substantially true, and not act for personal gain.

The KORU Project CIC has a responsibility to treat all disclosures within the confines of this procedure seriously, in confidence, and according to the procedures outlined above. The organisation will take measures to ensure that anonymity of the individual is maintained where reasonably practicable.

### 11. Monitoring and Review of Policy

This policy will be reviewed annually.

These procedures have been agreed by the board of trustees, who will approve them whenever reviewed.



## KORU Whistleblowing Policy 2025

Review date: January 2026.

### **12. Links with Other Policies**

Please also refer to the following KORU policies:

- Anti-Bullying Policy
- Grievance Policy
- Safeguarding and Child Protection Policy
- Safeguarding Adults Policy
- Code of Conduct
- Memorandum of Understanding (MOU)

### Appendix.

#### KORU Contact Information

##### The KORU Project CIC Contacts

KORU CEO- Andrea Micah: 07917 797528 – [andreamicah@korucic.com](mailto:andreamicah@korucic.com)

KORU Chair of the Board of Directors- [robwhiteman@cipfa.org](mailto:robwhiteman@cipfa.org)

KORU DSL- Michelle Lima: 07860142729 – [michellelima@korucic.com](mailto:michellelima@korucic.com)

KORU DSL – Al Stephens- [Alisonstephens@korucic.com](mailto:Alisonstephens@korucic.com)

KORU DDSL- Kathy Nobel: 07786 474787 – [kathynobel@korucic.com](mailto:kathynobel@korucic.com)

KORU DDSL- Ginny Carvisiglia: 07792 711253 – [ginnycarvisiglia@korucic.com](mailto:ginnycarvisiglia@korucic.com)

*Please ensure all safeguarding emails are also sent to [safeguarding@korucic.com](mailto:safeguarding@korucic.com)*

##### External Contacts

BCP Designated Officer: 01202 817 600- [LADO@BCPcouncil.gov.uk](mailto:LADO@BCPcouncil.gov.uk)

Dorset Designated Officer: via e-referral form accessible at <https://forms.office.com/Pages/ResponsePage.aspx?id=Nd9OCtLwI06Y9rCQC06h5mJpccnWqHpEloVyrRAkysJUMjk5V0RMUDk0QzIYRjBKRUIORURXTDIRTyQIQCN0PWcu>

Hampshire Designated Officer: 01962 876364

Wiltshire Designated Officer: 0300 456 0100

**If a client or KORU Representative is at risk of immediate harm, KORU Representatives must not delay and should ring 999.**