

Whistleblowing Policy & Procedure

Organisation: Her Way Forward CIC

Approved by Board on: 30/01/2026

Policy owner: Company Secretary

Designated Whistleblowing Officer (DWO): Yee Mun Thum | Secretary

Last reviewed: 30/01/2026

Next review due: 30/01/2027

1. Purpose and commitment

Her Way Forward CIC is committed to the highest standards of integrity, openness, accountability, and public trust.

This policy provides a **safe, clear process** for workers and others connected to the CIC to raise genuine concerns about wrongdoing **in the public interest**, including concerns about **fundraising practice** and **CIC asset lock / community benefit**.

We will:

- take all concerns seriously;
- investigate proportionately and fairly;
- protect people who raise concerns in good faith from retaliation or “detriment”;
- learn lessons and strengthen governance, safeguarding, and fundraising compliance.

This approach supports our duties as a **Community Interest Company** (*community benefit and asset lock*) and our commitment to comply with the **Code of Fundraising Practice** and the Fundraising Regulator’s expectations of ethical fundraising. ([GOV.UK](https://www.gov.uk))

2. Who this policy applies to

This policy applies to:

- employees and workers (*including agency workers*);
- directors and officers;
- volunteers and interns;
- contractors, consultants, and suppliers;
- fundraising partners and third-party fundraisers working for or with the CIC.

Legal note (plain English): UK “whistleblowing” legal protections primarily apply to **workers** (*including many employees and some contractors*). Volunteers are not always covered by

statutory whistleblowing law, but **we extend equivalent protections through this policy** (*no retaliation, fair handling, confidentiality*). ([GOV.UK](#))

3. What whistleblowing is (*and isn't*)

Whistleblowing means raising a concern where you reasonably believe information shows one or more of the following has happened, is happening, or is likely to happen, and the disclosure is **in the public interest**.

This policy is **not** for:

- personal grievances about your own employment (pay, rota, performance issues) — use the **Grievance Policy**;
- complaints from members of the public about service quality — use the **Complaints Policy**;
- immediate emergencies — call the emergency services where relevant.

If you're unsure which route applies, raise it with the DWO and we will guide you.

4. Examples of concerns you should raise

You can report (*this list is not exhaustive*):

A. Governance, integrity, and finance

- fraud, theft, bribery, corruption, or conflicts of interest not declared/managed;
- falsifying records or misleading reporting (*including impact reporting*);
- serious mismanagement or misuse of CIC funds or assets;
- **breach of the CIC asset lock** or diversion of assets away from community benefit.

B. Fundraising and supporter protection

- misleading fundraising communications or pressure selling;
- failure to follow the **Code of Fundraising Practice**;
- poor oversight of third-party fundraisers, unsafe incentive practices, or commission arrangements that create undue pressure;
- mishandling donations, restricted funds, or Gift Aid/financial controls linked to fundraising.

The Fundraising Regulator can consider concerns that an organisation may have breached the Code and provides a route for reporting concerns. ([Fundraising Regulator](#))

C. Safety, safeguarding, discrimination, and harassment

- danger to health and safety;
- safeguarding risks or concealment of safeguarding incidents;

- unlawful discrimination, victimisation, or harassment.

Sexual harassment (*important dates*):

- Employers already have a legal duty to take **reasonable steps to prevent sexual harassment** (*in force since 26 October 2024*). ([GOV.UK](#))
- From **6 April 2026**, disclosures about sexual harassment are explicitly treated as “qualifying” for whistleblowing protections under UK law. ([Acas](#))

D. Legal/regulatory breaches and concealment

- breaches of legal or regulatory obligations (*data protection, licensing, employment law, etc.*);
- deliberate concealment of any of the above.

5. How to raise a concern (*internal route*)

We encourage you to raise concerns **as early as possible**.

Step 1: Speak to your manager (*where appropriate*)

Report the concern to your **Line Manager**. If the concern involves your manager, skip to Step 2.

Step 2: Contact the Designated Whistleblowing Officer (*DWO*)

If you cannot raise it with your manager, or you believe the matter is serious, sensitive, or involves management, contact:

Designated Whistleblowing Officer: Yee Mun Thum, Secretary

Email: YeeMun@herwayforward.co.uk

What to include (*as far as you can*)

- what happened / is happening / might happen;
- dates/times/locations;
- who was involved (*if known*);
- any evidence (documents, screenshots, names of witnesses);
- whether you fear retaliation or need immediate support.

You do **not** need proof to raise a concern, a reasonable belief is enough.

6. Confidentiality, anonymity, and protection from retaliation

Confidentiality

We will make every effort to keep your identity confidential and share it only on a **need-to-know** basis (*e.g., with investigators*), subject to legal requirements.

Anonymous reports

You may report anonymously. We will consider anonymous disclosures, but anonymity may limit our ability to investigate fully or provide feedback.

No detriment / no retaliation

You will not suffer retaliation for raising a concern **in good faith**, even if it turns out to be mistaken. Retaliation includes dismissal, loss of shifts, demotion, bullying, threats, or any disadvantage.

Anyone found to have retaliated may face disciplinary action (*or contract termination for third parties*).

Support

We will offer appropriate support, which may include adjustments to reporting lines, wellbeing support, or other protective measures while the matter is assessed/investigated.

7. Investigation process and timeframes

We aim to handle whistleblowing concerns promptly and fairly.

1. **Acknowledgement:** within **5 working days** of receipt.
2. **Triage / risk assessment:** initial assessment to decide:
 - is this whistleblowing, a grievance, a complaint, or a safeguarding issue?
 - is immediate action required to prevent harm?
3. **Investigation plan:** proportionate to risk and complexity, with an investigator who is independent of the issue wherever possible.
4. **Updates:** we will provide periodic updates where appropriate, subject to confidentiality and data protection.
5. **Outcome:** we will share a high-level outcome with you where lawful (*we may not be able to share personal or disciplinary details about others*).

Records: We will keep secure records of concerns raised, actions taken, outcomes, and learning, in line with data protection requirements.

8. If you are not satisfied, or internal reporting is not appropriate (*external route*)

We encourage internal reporting first where safe and appropriate. However, you may raise concerns externally, especially where:

- you believe evidence may be concealed/destroyed;
- you fear retaliation;
- the concern involves senior leadership/board;
- the issue is particularly serious or urgent.

A. Prescribed persons (*legal whistleblowing route*)

The UK Government publishes the list of “**prescribed people and bodies**” you can report to (*choose the correct body for your issue*). ([GOV.UK](#))

Examples may include regulators for health and safety, data protection, financial conduct, etc. (*depending on the subject matter*).

B. CIC Regulator (*CIC governance / asset lock / community interest*)

The Office of the Regulator of Community Interest Companies can investigate complaints about CICs. ([GOV.UK](#))

Email (*CIC concerns*): cicconcerns@companieshouse.gov.uk ([GOV.UK](#))

C. Fundraising Regulator (*fundraising standards*)

You can report fundraising concerns via the Fundraising Regulator complaints process. ([Fundraising Regulator](#))

Email: complaints@fundraisingregulator.org.uk ([Fundraising Regulator](#))

Phone: 0300 999 3407 ([Fundraising Regulator](#))

If the CIC (*senior management/board*) needs to **self-report a known or potential breach** of the Code of Fundraising Practice, the Fundraising Regulator provides a self-reporting route (*requires organisational authority*). ([Fundraising Regulator](#))

D. Independent advice (*Protect*)

You can seek free, confidential whistleblowing advice from **Protect** (*the UK whistleblowing charity*). (protect-advice.org.uk)

Phone: 020 3117 2520 (protect-advice.org.uk)

Email: whistle@protect-advice.org.uk ([Charity Commission](#))

9. Malicious or knowingly false allegations

Concerns raised **honestly** will be supported, even if not substantiated. However, deliberately false or malicious allegations may lead to disciplinary action (*or contract termination for third parties*).

10. Related policies and documents

This policy should be read alongside:

- Safeguarding Policy
- Complaints Policy
- Grievance Policy
- Disciplinary Policy
- Fundraising Policy (and third-party fundraising oversight)
- Code of Conduct
- Data Protection Policy

11. Review and oversight

The Board will:

- receive periodic (*anonymised*) reporting on whistleblowing themes, outcomes, and learning;
- ensure appropriate independence and resourcing for investigations;
- review this policy at least annually and after any serious incident.