

Maddy's Mark's Whistleblowing Policy.

This policy was adopted by the Trustees by resolution dated 7th June 2026

This policy should be reviewed at least every two years.

Next review date: June 2028

1. Introduction

Maddy's Mark (MM) takes the conduct of its people seriously and puts in place policies to enable concerns to be treated fairly and addressed to ensure the proper operation of MM in the public interest. Our Whistleblowing Policy exists to ensure that people can safely raise concerns and feel confident they will be listened to, their concerns will be properly investigated and acted upon appropriately.

At the present moment, MM does not employ any staff, temporary or permanent.

It is important that any fraud, misconduct or wrongdoing by volunteers, permanent or temporary, including Trustees, acting on behalf of MM is reported and properly dealt with.

All those who believe there to be a valid complaint to be raised are encouraged to report their allegations without fear or favour. This policy sets out the way in which individuals may raise concerns and how those concerns will be dealt with.

2. Aim

The aim of this policy is to:

- Enable and encourage volunteers and Trustees to raise genuine concerns about possible wrongdoing at MM, without fear of reprisal;
- Reassure all those that might raise a concern that such matters will be dealt with seriously and effectively;
- Explain how to raise a concern and;
- Explain how MM will deal with concerns raised about possible wrongdoing.

This Whistleblowing Policy is designed to ensure that concerns about possible illegal or dangerous activities, or forms of malpractice, are brought swiftly to the attention of a person or body who can investigate and resolve the matter. Concerns can be raised even where they are not necessarily related to the whistleblower's area of work.

3. Background – Public Interest Disclosure Act 1998

The Public Interest Disclosure Act 1998 provides protection for those who raise legitimate concerns about specified matters. These are called "qualifying disclosures".

A qualifying disclosure is one made in the public interest by someone who has a reasonable belief that one of the following is being, has been, or is likely to be, committed:

- a criminal offence (including fraudulent and corrupt behaviour, e.g. theft, fraud or malpractice);
- a miscarriage of justice;
- an act causing risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above.

It is not necessary for the reporting person to have proof of such an act – reasonable belief is sufficient. The person raising the concern is not expected to investigate the matter themselves – it is MM's responsibility to ensure that an investigation takes place.

Anyone who makes such a “protected disclosure” has the right not to be dismissed, or subjected to any other detriment, or victimised in any way for making a disclosure.

Any employee who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken.

4. Definitions

For the purposes of this policy,

Volunteers include all those who conduct business on behalf of MM in an unpaid capacity

5. Procedure – who to disclose too internally

Volunteers are encouraged first, both by MM and by the Charity Commission, to consider raising any concerns they may have internally within MM. The following process outlines the internal reporting procedure:

If appropriate, a volunteer should discuss his/her concerns first with a Director.

If this also is not thought appropriate by the volunteer, they should next consider an approach to the Chair of the Board of Trustees;

If these internal approaches are not thought appropriate, or if the volunteer believes their complaint would not be taken seriously, or they remain unhappy with the speed or conduct of any action taken, the volunteer has the option of reporting their concerns to MM's Advisory Board or the external independent auditor.

For ease of reference by external complaints including supporters, volunteers and Trustees, the Whistleblowing Policy is published on the MM website, alongside the Safeguarding Policy and the Complaints Policy.

In all circumstances where an internal approach is made, the report by the volunteer will be treated in the strictest confidence. It will not result in a report to anyone within MM without the volunteer's agreement.

However, where concerns raised might involve an immediate safety or safeguarding issue, or other serious concern, some further action may be required through a report directly to law enforcement authorities, such as the Police, or by regulatory bodies, such as the Charity Commission.

Where this is the case, so long as the volunteer is not disadvantaged, the person receiving the complaint may refer the matter themselves up to the Chair of the Board of Trustees to escalate the matter promptly.

A volunteer must not approach individuals involved in his/her disclosure directly (whether to "tip them off" or otherwise) or attempt to investigate the matter personally.

6. Disclosures to external bodies

MM urges volunteers to exhaust the internal processes set out above but, in exceptional or urgent circumstances, it might be appropriate for them to contact an external regulatory body.

As MM is a charity registered and regulated under charities legislation the person raising a complaint may find that the Charity Commission is the most appropriate external organisation to contact. Alternatively, the Charity Commission may recommend the most appropriate organisation to whom qualifying disclosures may be made.

7. Disclosures to the press (including social media)

Disclosures to the press, including social media, will not be considered reasonable. This will constitute misconduct and will be treated as a disciplinary matter.

8. Advice and support for employees

If, at any stage in the procedures, employees are unsure about what to do and would like

independent advice, they might like to discuss their concerns with someone at Public Concern at Work. This body is an independent charity staffed by lawyers, which offers confidential free legal and practical advice on how people can raise concerns about malpractice

at work. It may be contacted at www.pcaw.co.uk.