

THE MINISTRY OF PARENTING (A Community Interest Company)

Promoting Creativity in Parenting Support

The Ministry of Parenting (CIC)

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WHISTLEBLOWING POLICY

Policy owner: The Ministry of Parenting CIC

Approved by: Directors

Review date: 14th September 2027

1. Policy Statement

The Ministry of Parenting CIC is committed to maintaining a culture of openness, honesty, accountability and safeguarding.

We want everyone working with or for the organisation to feel able to speak up if they have serious concerns about wrongdoing, unsafe practice, unlawful conduct, financial malpractice, safeguarding failures or other matters that could harm children, young people, families, staff, volunteers, the organisation or the wider public.

We recognise that people may sometimes be reluctant to raise concerns, particularly where the concern involves someone senior to them or someone with whom they work closely.

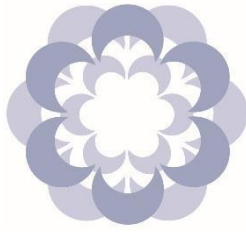
The Ministry of Parenting CIC will not tolerate retaliation, victimisation or detrimental treatment of anyone because they have raised a concern under this policy.

This policy is intended to provide a safe and clear route for raising concerns and sets out how those concerns will be considered and, where appropriate, investigated or referred to another appropriate body.

2. Purpose

The purpose of this policy is to:

- encourage people to raise serious concerns at the earliest opportunity;
- provide clear routes for raising concerns;
- ensure concerns are taken seriously and dealt with appropriately;
- protect people who raise concerns from victimisation or detriment;
- distinguish whistleblowing from complaints, grievances and safeguarding referrals;
- support a culture of openness and continuous improvement; and



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- help protect the children, young people, families and communities supported by the CIC.

Whistleblowing arrangements can help organisations identify wrongdoing early, support transparency and reduce organisational risk.

3. Who This Policy Applies To

This policy applies to anyone working with or for The Ministry of Parenting CIC, including:

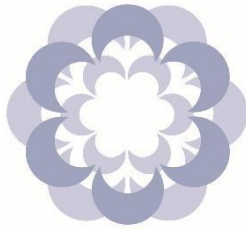
- employees;
- directors;
- sessional workers;
- freelance and self-employed practitioners;
- consultants and contractors;
- volunteers;
- students and placement workers;
- agency workers;
- trainees and apprentices; and
- other individuals undertaking work on behalf of the CIC.

The legal definition of a worker for the purposes of statutory whistleblowing protection is wider than simply being an employee. However, whether an individual qualifies for statutory protection will depend upon their particular circumstances and whether the legal requirements for a protected disclosure are met.

The Ministry of Parenting CIC nevertheless encourages anyone working with or for the organisation to raise serious concerns under this policy, irrespective of whether they fall within the statutory definition of a worker.

4. What Is Whistleblowing?

Whistleblowing is when a worker discloses information about wrongdoing which they reasonably believe is in the public interest.



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Under the statutory whistleblowing framework, a qualifying disclosure may relate to a reasonable belief that one or more of the following has occurred, is occurring or is likely to occur:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment;
- sexual harassment; or
- deliberate concealment of information relating to any of the above.

Within The Ministry of Parenting CIC, concerns about matters such as safeguarding failures, fraud, financial malpractice, misuse of organisational funds, corruption, dishonesty, unsafe practice, serious professional misconduct or serious breaches of organisational or regulatory requirements may therefore constitute whistleblowing where they fall within the statutory framework and meet the public-interest requirement.

A worker does not need to prove that wrongdoing has occurred before raising a concern. They should have a reasonable belief that the information they are disclosing tends to show wrongdoing.

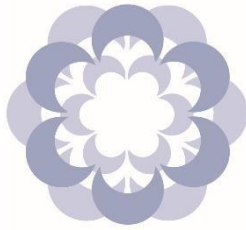
5. What Is Not Normally Whistleblowing?

Whistleblowing is different from raising a personal workplace grievance.

Examples of matters that would normally be dealt with through another procedure include:

- a disagreement about an individual's working arrangements;
- an individual pay dispute;
- a personal grievance about a manager or colleague;
- dissatisfaction with annual leave arrangements; or
- a disagreement about an individual performance assessment.

These should normally be raised through the organisation's Grievance Policy or other relevant procedure.



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However, a matter affecting an individual personally may also amount to whistleblowing where the concern is in the public interest and meets the relevant legal requirements.

Where someone is unsure which procedure applies, they should raise the concern and seek guidance rather than being expected to make a legal judgement themselves.

6. Safeguarding Concerns

Where a concern relates to the safety or welfare of a child, young person or adult at risk, the organisation's Safeguarding Policy and procedures must also be followed.

A safeguarding concern must not be delayed because someone is uncertain whether it also constitutes whistleblowing.

Immediate safeguarding concerns must be reported promptly through the appropriate safeguarding route. Where necessary, the organisation will make referrals to the relevant safeguarding authority, police, emergency service or other statutory organisation.

Whistleblowing may be particularly relevant where a concern relates to:

- unsafe safeguarding practice;
- failure to respond appropriately to safeguarding concerns;
- deliberate concealment of safeguarding information;
- the conduct of a person working with or on behalf of the organisation; or
- organisational practices that may place children, young people or adults at risk.

The organisation will ensure that safeguarding concerns are not lost or delayed within a whistleblowing or organisational process.

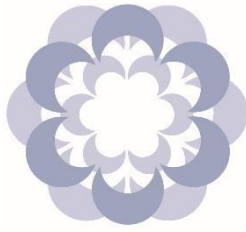
7. How to Raise a Concern

Where possible, a concern should initially be raised with:

Director / Designated Whistleblowing Contact

Name: Shelly Steel

Role: Director



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Email: shelly@theministryofparenting.com

A concern can be raised:

- verbally;
- in writing;
- by email; or
- during a private meeting.

A written disclosure is encouraged where possible because it provides a clear record of the concern. However, a person will not be prevented from raising a concern because they are unable or unwilling to put it in writing.

Where possible, the person raising the concern should provide:

- what they believe has happened;
- when and where it happened;
- who was involved;
- why they are concerned;
- whether anyone may currently be at risk;
- whether the concern has previously been raised; and
- any relevant evidence or information they already have.

A person raising a concern is not expected to investigate the matter themselves or gather extensive evidence before making a disclosure.

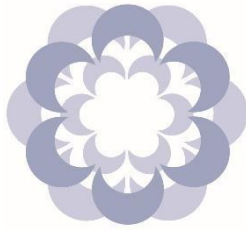
8. If the Concern Involves the Director

Where the concern involves the Director, or where the person does not feel able to raise the matter with the Director, the concern should be raised with:

Non-Executive Director

Name: Luke Webb

Email: Luke.webb@theministryofparenting.com



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Where necessary, an appropriately independent person may be appointed to advise upon or investigate the matter.

9. If the Concern Involves Another Director

Where a concern relates to another Director, it should be raised with a Director who has no involvement in the matter.

Where this is not appropriate, or where independence is required, the Directors may appoint a suitably independent person to advise upon or investigate the concern.

10. Anonymous Concerns

Concerns may be raised anonymously.

However, anonymous disclosures can make it more difficult to:

- investigate the concern fully;
- ask follow-up questions;
- obtain additional information; or
- provide feedback to the person raising the concern.

The organisation will nevertheless consider anonymous disclosures seriously and assess the information available to determine whether further action is appropriate.

11. Confidentiality

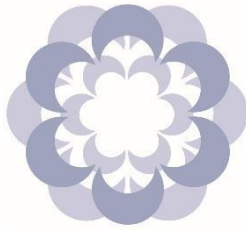
The Ministry of Parenting CIC will make reasonable efforts to maintain the confidentiality of people who raise concerns.

Information will only be shared with those who need to know in order to assess, manage, investigate or respond to the concern.

There may be circumstances where confidentiality cannot be maintained, for example where:

there is a legal requirement to disclose information;

- safeguarding action is required;
- information must be provided to a statutory authority;



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- disclosure is required as part of a fair investigation or legal process; or
- disclosure is necessary to protect someone from serious harm.

Where possible and appropriate, this will be explained to the person who raised the concern.

12. Protection from Victimisation and Detriment

The Ministry of Parenting CIC will not tolerate bullying, harassment, intimidation, retaliation or detrimental treatment of someone because they have raised a whistleblowing concern.

Examples of detrimental treatment could include:

- reducing someone's hours because they raised a concern;
- excluding or isolating them;
- unfairly changing their duties;
- threatening behaviour;
- bullying or harassment;
- unfair disciplinary action; or
- refusing opportunities because they raised a concern.

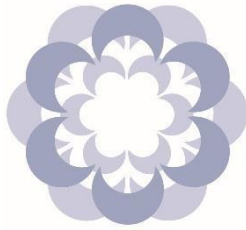
Workers who make protected disclosures meeting the statutory requirements have legal protection from detriment and, where applicable, dismissal.

Any concern that a person is being subjected to detrimental treatment because they have raised a concern will be taken seriously. Deliberate retaliation may be addressed under the organisation's disciplinary, contractual or other relevant procedures.

13. Unsubstantiated, False or Malicious Disclosures

The organisation recognises that people may raise concerns which, following investigation or consideration, are not substantiated.

A person will not face adverse treatment simply because a concern they raised turns out to be mistaken or is not substantiated.



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However, knowingly making a deliberately false or malicious allegation, or deliberately providing false information as part of an investigation, may be addressed under the organisation's disciplinary, contractual or other relevant procedures.

The emphasis of this policy is on enabling people to raise concerns without fear of repercussions for doing so.

14. What Happens After a Concern Is Raised?

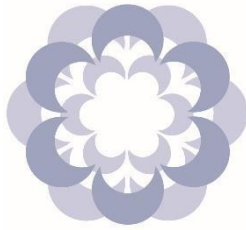
The person receiving the disclosure will, as appropriate:

- acknowledge the concern;
- establish the nature and seriousness of the concern;
- consider whether there is an immediate safeguarding, criminal, health and safety or other urgent risk;
- determine whether further investigation, action or referral is required;
- identify who is appropriate to consider or investigate the matter;
- keep an appropriate record; and
- provide feedback to the person who raised the concern where it is lawful and appropriate to do so.

The organisation will respond promptly and proportionately.

Not every concern will require a formal investigation. Depending upon the circumstances, it may be appropriate to:

- seek further information;
- undertake an internal review;
- initiate a formal investigation;
- refer a safeguarding concern to the appropriate authority;
- report suspected criminal activity to the police;
- seek professional or legal advice;
- refer the matter to an external regulator or prescribed person; or
- use another appropriate organisational procedure.



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Where someone may be at immediate risk of harm, safeguarding or emergency action will take priority over the internal whistleblowing process.

15. Investigation

Where an investigation is required, the organisation will aim to ensure that it is:

- fair;
- objective;
- proportionate;
- appropriately independent;
- conducted with appropriate confidentiality; and
- completed as promptly as reasonably possible.

The person appointed to investigate should, wherever possible, have no material involvement in the matter being investigated.

Where a concern relates to a particular individual, that person will normally be given an appropriate opportunity to respond to relevant allegations, subject to safeguarding, legal and investigative considerations.

The person who raised the concern will not be expected to investigate the matter themselves.

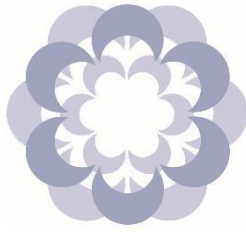
16. External Disclosure

The Ministry of Parenting CIC encourages concerns to be raised internally where it is appropriate and safe to do so. However, a worker is not required to raise a concern internally before making a disclosure externally where the law permits otherwise.

In some circumstances, a worker may be legally protected when making a disclosure to an appropriate external body or prescribed person.

The appropriate prescribed person depends upon the subject matter of the concern. The current list of prescribed persons and bodies is published by GOV.UK and should be consulted where external disclosure is being considered.

Workers considering an external disclosure may wish to obtain independent advice from:



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- Acas;
- Protect;
- a trade union;
- an appropriate professional body; or
- an independent legal adviser.

Different legal requirements apply depending upon whom a disclosure is made to and the circumstances in which it is made.

Nothing in this policy is intended to prevent or discourage a person from making a disclosure to an appropriate external body where they are entitled to do so.

17. Protection of a Person Who Is the Subject of a Concern

The organisation will also treat people who are the subject of whistleblowing concerns fairly.

Being the subject of a disclosure does not mean that wrongdoing has occurred.

The organisation will:

- avoid prejudging the outcome;
- maintain confidentiality where possible and appropriate;
- provide an appropriate opportunity to respond where applicable;
- follow relevant safeguarding, disciplinary, contractual or other procedures; and
- take proportionate action where concerns are substantiated.

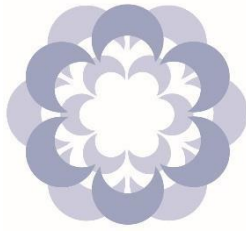
The rights and safety of children, young people and adults at risk, and the integrity of any safeguarding, police or regulatory investigation, will take priority where necessary.

18. Records

The organisation will maintain appropriate records of whistleblowing concerns and action taken.

Records may include:

- the date the concern was raised;



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- the nature of the concern;
- who received it;
- risk or safeguarding considerations;
- actions taken;
- referrals made;
- investigation findings;
- actions arising from the concern; and
- outcomes and organisational learning.

Records will be stored securely and handled in accordance with applicable data protection requirements.

Information will only be retained for as long as necessary and appropriate, having regard to legal, safeguarding, regulatory and organisational requirements.

19. Learning and Organisational Improvement

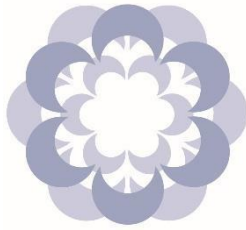
Whistleblowing is an important part of organisational learning and accountability and is not solely concerned with identifying individual wrongdoing.

Where a concern identifies weaknesses in organisational systems or practice, The Ministry of Parenting CIC will consider whether improvements are required in relation to:

- safeguarding arrangements;
- training;
- supervision;
- management processes;
- financial controls;
- policies and procedures;
- communication;
- risk management; or
- governance.

Lessons arising from concerns will be used to strengthen organisational practice wherever appropriate.

20. Support for People Raising Concerns



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The organisation recognises that raising or being involved in a serious concern can be stressful.

Where appropriate, a person raising a concern may be offered:

- a named contact;
- an opportunity to discuss the process;
- information about available sources of support;
- reasonable consideration of their wellbeing; and
- the opportunity to be accompanied at relevant meetings by an appropriate support person, colleague or trade union representative where appropriate.

The organisation will also consider the wellbeing and support needs of other people involved in the process.

21. Responsibilities

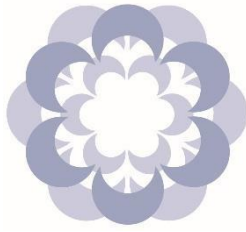
Directors

The Directors are responsible for:

- ensuring the CIC has effective whistleblowing arrangements;
 - promoting a culture in which concerns can be raised safely;
 - ensuring concerns involving senior people are handled appropriately;
 - ensuring appropriate independent oversight where required;
 - taking appropriate action where concerns are substantiated; and
 - considering significant organisational learning arising from disclosures.
- Director / Designated Whistleblowing Contact

The nominated person is responsible for:

- receiving concerns;
- ensuring concerns are appropriately recorded;
- assessing the nature and seriousness of the concern;
- identifying immediate safeguarding or other risks;
- arranging appropriate action, investigation or referral;
- escalating safeguarding or other urgent matters;



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- maintaining confidentiality wherever possible and appropriate; and
- reporting significant organisational issues to the Directors where appropriate.
- Everyone Working With or for the CIC

Everyone working with or for The Ministry of Parenting CIC is expected to:

- raise concerns where they reasonably believe serious wrongdoing may have occurred;
- report safeguarding concerns promptly;
- cooperate honestly with investigations;
- respect appropriate confidentiality; and
- not victimise or retaliate against anyone who raises a concern.

22. Review of Policy

This policy will be reviewed at least annually and sooner where:

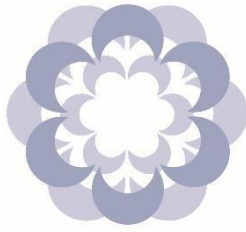
- relevant legislation changes;
- safeguarding guidance changes;
- organisational activities or structures change;
- an incident or concern identifies improvements that are required; or
- government or regulatory guidance is updated.

The organisation will seek to ensure that this policy remains consistent with current whistleblowing legislation and guidance.

Related Policies

This policy should be read alongside relevant Ministry of Parenting CIC policies and procedures, including:

- Safeguarding Policy;
- Safer Recruitment Policy;
- Grievance Policy;
- Disciplinary Policy;
- Complaints Policy;



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- Equality, Diversity and Inclusion Policy;
- Data Protection and Confidentiality Policy;
- Code of Conduct;
- Health and Safety Policy; and
- relevant governance procedures.

Where a listed policy does not apply to a person's employment or contractual status, the principles and any other relevant organisational procedure will be applied as appropriate.

Key Legislation and Guidance

The Ministry of Parenting CIC will have regard to current legislation and guidance, including:

- Employment Rights Act 1996, as amended;
- Public Interest Disclosure Act 1998;
- current GOV.UK whistleblowing guidance;
- the current GOV.UK list of prescribed persons and bodies;
- Acas guidance on whistleblowing at work;
- Protect guidance and advice; and
- relevant safeguarding, regulatory and statutory guidance.

The Employment Rights Act 1996, as amended, provides the principal statutory framework for whistleblowing protection in Great Britain. The Public Interest Disclosure Act 1998 introduced statutory whistleblowing protections through amendments to that framework.