

## **WHISTLEBLOWING POLICY**

### **Policy Statement**

Music Theatre Wales is committed to maintaining the highest standards of openness, integrity and accountability in everything we do. We encourage anyone working for, or with, MTW to report any concerns about unethical, illegal, or improper conduct within our organisation.

We assure that all reports will be treated with the utmost confidentiality and that whistleblowers will be protected from retaliation. Our goal is to address any concerns promptly and thoroughly, ensuring a safe and ethical working environment for everyone.

### **1. Purpose**

The purpose of this policy is to provide a framework for reporting any concerns about unethical, illegal, or improper conduct within MTW. This policy also outlines how MTW will deal with such complaints to ensure that all concerns are addressed promptly and appropriately.

The aim of this Policy is to ensure that everyone working for, or with, MTW are confident that they can raise a genuine matter of concern under the Policy without fear of reprisals and that they shall not be subjected to any detriment or other disadvantage by reason of raising such matters.

### **2. Scope**

This policy and associated procedures applies to everyone working for or with MTW (permanent, freelance, trustees, contractors, trainees and volunteers, collectively known as “staff” throughout the policy).

### **3. Definition of Whistleblowing**

Whistleblowing is the act of reporting concerns about misconduct, unethical behaviour, or illegal activities within the organisation. This may include, but is not limited to:

- Fraud or financial irregularities
- Corruption or bribery
- Health and safety violations
- Safeguarding concerns
- Discrimination or harassment
- Environmental damage
- Any other illegal or unethical conduct

Staff should use this policy and associated procedures if they have a genuine concern that there are reasonable grounds for believing that any of the above activities have occurred, are occurring or are likely to occur.

It is impossible to give an exhaustive list of activities that constitute misconduct, unethical behaviour or illegal activities and it may not always be clear that a particular action falls within

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one of the above categories. However, MTW would prefer staff to report their concerns rather than keep them to themselves. If a report is made in good faith then, even if it is not confirmed by an investigation, disciplinary action will not be taken.

### 4. Whistleblowing vs Grievance

Whistleblowing and grievances are both important mechanisms for addressing issues within our organisation, but they serve different purposes. Grievances address personal workplace issues, whilst whistleblowing focuses on exposing broader misconduct that affects others or the public. The outcome of a whistleblowing process is focussed on exposing wrongdoing and ensuring accountability, often with broader implications beyond the organisation whereas the outcome of a grievance process is aimed at resolving a specific complaint, often through mediation, arbitration, or changes in workplace policies.

To read MTW's Grievance Policy or to raise a complaint relating to personal circumstances in the workplace, please access this [here](#).

Concerns about malpractice within MTW which fall within the categories outlined above and affects or could affect for example, our Charity status, service users, members of the public or other workers should be raised using the procedures set out in this policy.

### 5. Reporting Procedure

Staff are encouraged to report concerns as soon as they become aware of them. Reports can be made through the following channels:

- Directly to an immediate manager or project lead
- To MTW's General Manager: [kathryn@musictheatre.wales](mailto:kathryn@musictheatre.wales)
- To the Chair of MTW's Board of Trustees: [kerryskidmore.mtw@gmail.com](mailto:kerryskidmore.mtw@gmail.com)
- Through MTW's dedicated safeguarding email address: [safeguarding@musictheatre.wales](mailto:safeguarding@musictheatre.wales)

Individuals are encouraged to put their concerns in writing, stating that they are using the Whistle Blowing Policy and put their name to the allegation wherever possible.

Reasons for concerns should be explained within this initial report, but absolute proof is not required at this stage.

### 6. Confidentiality

All reports will be treated with the utmost confidentiality. The identity of the whistleblower will be protected unless disclosure is required by law.

In order not to jeopardise the investigation into the alleged malpractice, the whistleblower will also be expected to keep the fact that they have raised a concern, the nature of the concern and the identity of those involved confidential.

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There may be circumstances in which it will be necessary to disclose the whistleblower's identity, because of the nature of the investigation or disclosure. This may occur in connection with associated disciplinary or legal investigations or proceedings. If, in MTW's view, such circumstances exist, the Company will inform the whistleblower that their identity is likely to be disclosed. If it is necessary for the whistleblower to participate in an investigation, the fact that they made the original disclosure will be kept confidential (as far as is reasonably practicable) and all reasonable steps will be taken to protect the whistleblower from any victimisation or detriment as a result of having made a disclosure. It is likely, however, that the whistleblower's role could still become apparent to third parties during the course of an investigation.

### **7. Protection Against Retaliation**

MTW is committed to ensuring that no-one suffers retaliation as a result of reporting concerns in good faith. Retaliation includes, but is not limited to, dismissal, demotion, harassment, or any other form of discrimination. MTW will not tolerate any harassment or victimisation of individuals who raise serious concerns and will take appropriate action to protect them.

### **8. Investigation Process**

All reports will be investigated promptly and thoroughly. The investigation process will include:

#### **a. Acknowledgment of the report**

MTW will acknowledge receipt of reports within five working days. Where appropriate, this acknowledgment will:

- Indicate how MTW proposes to deal with the matter
- Advise whether any preliminary enquiries have been made
- Advise whether any further investigations will take place and if not, why not

#### **b. Assessment of the report**

MTW will then carry out preliminary enquiries to determine the appropriate course of action, and to decide whether a full investigation is necessary.

#### **c. Conducting a fair and impartial investigation**

If an investigation is necessary then, depending upon the nature of the misconduct, concerns will either be:

- Investigated internally, or
- Referred to an appropriate external person (for example, a board member, external auditor, other regulatory body or the police) for investigation

An individual may be accompanied by a companion, who should be either a fellow employee or an official employed by a trade union, at any meetings or interviews in connection with the concerns they have raised. MTW may, at its discretion, allow individuals to bring a companion who is not a colleague or union representative (for example, a member of your family, member of a professional support body or a legal

representative) if this will help the Employee overcome a health-related issue (mental or physical), disability, or any difficulty in understanding English.

**d. Taking corrective action if necessary**

MTW commit to taking appropriate action based on the outcome of the investigation.

Subject to any legal restraints the individual raising the concern will be informed of the outcome of the preliminary enquiries, the full investigation and any further actions that have been taken.

MTW will maintain a record of all concerns raised and the outcomes in a form that does not endanger the individual's confidentiality.

**9. Taking the matter further**

If the whistleblower is unhappy with the outcome of an investigation, it is recommended that they submit a report to the Chair of the Board of Trustees explaining their dissatisfaction. The concern will be investigated again if there is a good reason to do so.

However, MTW recognises that there may be circumstances where it may be appropriate for a whistle-blower to report their concerns to an external body, such as a regulator. [Protect](#) is the UK's leading whistle-blowing charity and offer free expert and confidential advice on how best to raise your concern and your protection as a whistleblower

**10. False Reporting**

Staff are encouraged to report concerns in good faith. Anyone found to have made a false report maliciously or for personal gain may be subject to disciplinary action.

**11. Review and Monitoring**

This policy will be reviewed regularly to ensure its effectiveness. The organisation will monitor the implementation of this policy and make improvements as necessary.

**12. Contact Information**

For any questions or further information about this policy, please contact Kathryn Joyce, MTW's General Manager – [kathryn@musictheatre.wales](mailto:kathryn@musictheatre.wales)

**13. Policy review record**

This policy came into force on: **7 July 2025**

Its next review date will be: **7 July 2026**