PARADIGM ARTS
VISUAL | MEDIA | PERFORMING

Paradigm Arts Whistleblowing Policy (Academic Year 2026 - 2027)

Introduction

The Public Interest Disclosure Act 2013, The Act protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing

The Act protects most workers in the public, private and voluntary sectors. The Act does not apply to genuinely self-employed professionals (other than in the NHS), voluntary workers (including charity trustees and charity volunteers) or the intelligence services.

Policy Statement

Paradigm Arts is committed to the highest standards of honesty, openness and accountability. It aims to ensure that it operates in a responsible and professional manner. We recognise that individual members of staff as and when contracted have an important role in helping us to achieve this aim.

Paradigm Arts employs freelance and self employed practitioners in the delivery of arts, creativity and cultural learning activities in schools and learning settings who are the first to know if someone appears to be acting illegally or improperly. They may feel apprehensive or anxious about raising their concerns; they might be concerned that they will not be taken seriously or that disclosure might lead to action being taken against them.

In recognition of this Paradigm Arts openly encourages individuals who have knowledge, or reasonable suspicion, of wrongdoing to come forward. We commit to dealing fairly and appropriately with all concerns as raised because we value the importance and working relationship with all staff and clients. Paradigm Arts takes all reports of wrongdoing seriously and believes that any evidence suggesting inappropriate or unlawful behaviour should be investigated thoroughly.

This policy outlines the processes and procedures for raising and sharing concerns

Scope of the Policy and Procedure.

The policy and procedures are concerned with alleged malpractice, impropriety or wrongdoing in which is in the public interest to disclose. Although it is difficult to provide an exhaustive list, these might include the following:

i. Financial malpractice or impropriety or fraud;

ii. Failure to comply with a legal or contractual obligation

iii. Dangers to health and safety or the environment;

iv. Criminal activity;

v. Professional malpractice, which includes matters such misconduct,

vi. Improper conduct or unethical behaviour including any offence under the Bribery Act 2010

vii. Miscarriage of justice;

viii. Attempts to conceal any of the above.

Procedure for making and investigating a disclosure

Concerns should normally be expressed in writing to the Director of Paradigm Arts Ltd (Robert Pitman) who is designated as the person primarily responsible for oversight of this procedure. If, however an allegation directly concerns the Director, or his involvement would not be appropriate for any significant reason then an individual should seek advice and support from www.pcaw.org.uk

The Director will consider the information disclosed and decide whether the matter falls within the scope of this procedure and if so whether there are grounds for proceeding with an investigation

a) If the matter falls outside this procedure but within another, then the individual making the disclosure will be informed and directed to the appropriate process
b) If the Director decides that there are insufficient grounds on which to proceed the individual making the disclosure will be informed and will have the right to provide further information and resubmit the concerns
c) If there are grounds for proceeding the Director will decide how the investigation should be undertaken. This will depend on the nature of the matter and may involve: i) an internal investigation conducted by a sufficiently independent agent or external auditor, ii) referring the matter to the police, iii) an independent external inquiry

The investigation will not be conducted by the Director or any other person who may have to take significant decisions arising from the findings. It will be conducted as sensitively as possible and normally completed within eight weeks of the disclosure being made. The investigation will also take into account concepts of natural justice and the need to safeguard individuals reputations.

When an allegation concerns a named individual, the person concerned will be informed of the allegation and of the evidence supporting it. He/She will be invited to respond to the allegation as part of the investigation and/or before any final conclusion is reached. The point at which it is appropriate for the individual to be informed will depend on the nature of the case.

In any hearing under these procedures, the individual making the disclosure and the person against whom the allegation has been made are both entitled to be accompanied by his/her union representative, college or friend.

The findings of any investigation will be reported to the Director or other identified person who will reach a decision on any further action to be taken. The Director will inform the individual making the disclosure of the conclusion reached and what action, if any, is to be taken and why.

If the individual making the disclosure is dissatisfied about how an inquiry was handled, and/or its resultant outcome, then he/she may appeal but only on procedural grounds.

A report summarising all disclosures and inquiries and any subsequent actions taken will be made by the director and such reports will be retained for a minimum of three years

Safeguards

Paradigm Arts is keen to ensure that the position of both the individual raising concerns and anyone about whom allegations might be made are safeguarded. It will do this through the following measures.

Protection
The procedure offers protection against dismissal or other penalty by Paradigm Arts to those individuals who disclose any relevant concerns, provided that the disclosure is made:
i. in good faith; and
ii. in the reasonable belief that what is disclosed may help identify malpractice, and
iii. to the appropriate person.

Confidentiality
Paradigm Arts will aim to treat all disclosures and information regarding any action taken under these procedures in a confidential and sensitive manner, in particular:

Individual making a disclosure
The identity of the individual making an allegation will remain confidential, unless otherwise agreed with that individual, as long as it does not hinder or frustrate the investigation and is compatible with natural justice. However, the investigation process may at some stage need to reveal the source of the information, and the individual making the disclosure may at that stage need to provide an attributable statement as part of the evidence to be presented.

Named individual
During the course of any investigation Paradigm Arts will, as far as is reasonably possible without prejudicing that investigation, endeavour to maintain confidentiality regarding the names of any person/people named in an allegation.

Anonymous Allegations
Individuals are normally expected to put their name to any disclosures or allegations they make. Concerns expressed anonymously will not normally be addressed. However, at its discretion Paradigm Arts may decide to do so after taking into account:

i) The seriousness of the issues raised; and
ii) The credibility of any allegations: and
iii) the likelihood of being able to substantiate the allegation through attributable sources.

Unsubstantiated Allegations
No action will be taken against an individual who makes an allegation in good faith even if it is not confirmed by subsequent investigation. If, however, an individual makes what are subsequently determined to be malicious or vexatious allegations for personal gain action may be taken. A disclosure may be deemed malicious or vexatious at any stage of the procedure.

Independent Advice

Paradigm Arts is keen to ensure that the position of both the individual raising concerns and anyone about whom the allegations might be made are safeguarded. It will seek to do this through the following measures:

If an individual is not clear whether to use this procedure, or if they want independent advice at any stage they are advised to contact the following as appropriate:

i) A relevant officer or department within the Local Authority www.lincolnshire.go.uk
ii) The local Citizens Advice Bureau;
iii) Public Concern at Work online contact form https://protect-advice.org.uk/contact-protect-advice-line/ (helpline@pcaw.co.uk) www.pcaw.co.uk 020 3117 2520

This policy and procedure is intended to clarify for individuals the route through which concerns can be raised and to assure them that such matters will be taken seriously and acted upon. Paradigm Arts takes the view that in the vast majority of cases an internal investigation and decision is the most appropriate course of action.

If an individual raises matters of concern to external agency without first addressing Paradigm Arts, he/she may be regarded as being in breach of the procedure. This could be regarded as a disciplinary offence especially if it causes or might have caused unnecessary damage to reputations.

In such circumstances an individual may be deemed as having waived their rights under the Public Interest Disclosure Act. In particular, it would not usually be considered appropriate for matters to be raised publicly in the media before an investigation is completed. Public Concern at Work are able to advise independently on these matters.