



British Dance Council Whistleblowing Policy

1. Our commitment

The British Dance Council (BDC) is committed to high standards of openness, integrity and accountability.

We want people to feel able to raise serious concerns about wrongdoing, unsafe practice or improper behaviour connected with the BDC without fear of being treated unfairly for doing so.

This policy explains how you can raise a concern, what will happen when you do, and who may need to be involved.

2. Understanding the role of the British Dance Council

It is important to understand the structure and role of the BDC when making a disclosure.

The British Dance Council is an organisation made up of a number of **corporate member organisations** representing different areas of the dance profession.

Individual dance professionals are members of or registered with one of these corporate member organisations. Their individual professional membership and professional standards will therefore be upheld by one of these organisations.

This is important when deciding who is best placed to deal with a concern.

Concerns about members of BDC corporate member organisations

If you make a disclosure through the BDC Whistleblowing Procedure and your concern relates to an individual who holds professional membership, registration or another professional status with one of the BDC's corporate member organisations, the BDC will need to **share relevant information about your concern with that organisation**.

This is so that the organisation which holds the individual's membership or registration can consider the concerns and, where appropriate, address them directly through its own complaints, safeguarding, disciplinary, membership or other relevant procedures.

The BDC may remain involved where appropriate, but it will not seek to replace the responsibilities or procedures of a corporate member organisation where that organisation is the appropriate body to consider concerns about one of its own members.

Any information shared will be handled appropriately and with due regard to confidentiality and the nature of the concern.

3. What is whistleblowing?

Whistleblowing is the raising of a serious concern about wrongdoing or malpractice that you reasonably believe has taken place, is taking place, or may take place.

This may include concerns about:

- fraud or other financial wrongdoing;
- failure to meet a legal obligation;
- risks to health and safety or the environment;
- criminal activity;



- serious improper or unethical behaviour;
- discrimination; or
- attempts to hide or cover up any of the above.

Whistleblowing is intended for serious concerns of this kind. It should not normally be used simply because someone disagrees with a business or financial decision.

It should also not be used to reopen a matter that has already been properly considered under another appropriate procedure, such as a complaints, harassment or disciplinary procedure.

4. Who can raise a concern?

The BDC wants those connected with its work to be able to raise legitimate concerns responsibly.

This may include BDC staff, corporate members, adjudicators, teachers and dancers.

You do not need to prove your concern before raising it. However, you should have a reasonable belief that the information you are providing indicates serious wrongdoing or malpractice.

5. Protection for people raising concerns

The BDC will take genuine whistleblowing concerns seriously.

A person raising a concern should do so honestly, in good faith and with a reasonable belief that the information they are providing indicates wrongdoing or malpractice.

If you raise a genuine concern in good faith and it later turns out to be mistaken or cannot be proven, the BDC will not take action against you simply because the concern was not substantiated.

However, deliberately making false or malicious allegations is a serious matter and may result in appropriate action.

6. Confidentiality

The BDC will handle whistleblowing disclosures sensitively and, as far as reasonably possible, confidentially.

We will try to protect the identity of the person raising the concern where possible. However, we cannot promise complete anonymity in every case.

For example, an investigation may make it possible for others to identify the source of the information, or the person raising the concern may need to provide a statement or further evidence.

Information may also need to be shared with another appropriate organisation or authority in order for the concern to be dealt with properly.

This includes sharing relevant information with a **BDC corporate member organisation where the concern relates to an individual whose professional membership or registration is held by that organisation.**

Where there is evidence of criminal activity, information may also need to be referred to the police or another appropriate statutory authority.

7. Anonymous concerns



We encourage people to give their name when raising a concern. This usually makes it easier to understand the issue, ask questions and carry out a fair and effective investigation.

We recognise, however, that there may be circumstances in which someone wishes to raise a concern anonymously.

Anonymous concerns may still be considered. When deciding what action can be taken, the BDC will consider matters such as:

- the seriousness of the concern;
- the credibility of the information provided; and
- whether the information can be confirmed from other reliable sources.

The BDC's ability to investigate an anonymous concern may be limited if there is not enough information available.

8. How to make a disclosure

If you wish to raise a whistleblowing concern, you should provide as much clear information as you reasonably can.

This should include:

- what you believe has happened;
- who is involved;
- when and where it happened;
- why you believe the matter is serious;
- whether anyone else may have information about it; and
- any documents or other information that may support your concern.

You are not expected to investigate the matter yourself.

Your responsibility is to raise the concern. It is then for the appropriate person or organisation to decide how it should be considered.

9. Who will deal with the concern?

When the BDC receives a disclosure, it will consider the nature of the concern and who is the appropriate person or organisation to deal with it.

Ordinarily, a complaint of malpractice will be referred to the appropriate BDC Director.

Where the concern relates to that Director, or there may be a conflict of interest, the matter should be referred to the President.

Where appropriate, the President may appoint another senior person or an external person to consider or investigate the matter.

Concerns about the President should be referred to the Vice-President, who will nominate an appropriate internal or external investigating officer.

10. When another organisation is responsible

Not every concern reported to the BDC will be a matter that the BDC itself has the authority or responsibility to investigate.



In particular, the BDC is made up of corporate member organisations, many of which hold the professional memberships or registrations of individual dance professionals.

Where a disclosure concerns the conduct of an individual who is professionally registered with, or is a member of, one of those organisations, the BDC may refer the matter and share relevant information with the appropriate corporate member.

That organisation can then consider whether the concern should be dealt with under its own procedures.

Depending on the circumstances, this might include its:

- complaints procedure;
- disciplinary procedure;
- safeguarding procedure;
- professional conduct or ethics procedure; or
- membership or registration rules.

This ensures that concerns are considered by the organisation that has the appropriate relationship with, and responsibility for, the individual concerned.

Where a matter needs to be referred elsewhere, the BDC will seek to explain this to the person who raised the concern, where it is appropriate and possible to do so.

11. What happens after a concern is raised?

The BDC will aim to acknowledge a whistleblowing concern in writing as soon as reasonably possible.

The concern will then be considered to decide:

- whether it falls within this Whistleblowing Policy;
- whether further information is needed;
- whether the BDC is the appropriate organisation to investigate it;
- whether it should be referred to a BDC corporate member organisation;
- whether another BDC procedure should be used; or
- whether the matter should be referred to an external or statutory authority.

If an investigation is required, the investigating officer will gather the information needed to understand the concern and reach a fair conclusion.

Other people, professional bodies or associated organisations may be asked to assist where appropriate.

12. Criminal matters

If information suggests that criminal activity may have taken place, the matter will be referred to the police where appropriate.

Any internal BDC process must not interfere with or obstruct a police investigation.

13. Keeping you informed

The time needed to deal with a whistleblowing concern will depend on its nature and complexity.



Some matters may involve another organisation, an external investigator, the police or another statutory body. For this reason, it is not always possible to provide a fixed timescale.

The BDC will aim to deal with concerns as promptly as reasonably possible while ensuring that any investigation is thorough and fair.

Where appropriate, the person who raised the concern will be kept informed about progress.

There may, however, be limits on the information the BDC can provide about another person, an investigation, disciplinary action or confidential matters.

14. Outcome of an investigation

Where the BDC investigates a concern, the investigating officer will consider the available evidence and prepare an appropriate record or report of their findings.

Where a concern is upheld, the BDC will consider what action should follow.

This may include using another BDC procedure or referring the matter to another organisation that has responsibility for the individual or issue concerned.

Where appropriate, lessons identified from a whistleblowing concern may also be used to review and improve BDC policies, procedures or working practices.

15. If you remain concerned

If you believe your concern has not been dealt with properly, you may raise the matter confidentially with the President or Vice-President.

Where the BDC's internal procedures have been exhausted, individuals may also have legal rights to make disclosures to an appropriate prescribed person, regulator or other body.

16. The purpose of this policy

The purpose of this policy is to make sure that serious concerns are heard and directed to the people or organisations best placed to deal with them.

The BDC will take concerns seriously, treat people fairly and handle information sensitively.

At the same time, the BDC recognises the responsibilities of its corporate member organisations. **Where a concern is about an individual whose professional membership or registration is held by a BDC corporate member, the BDC may share relevant information with that organisation so that it can consider and address concerns about its own member directly.**

This approach helps ensure that concerns are dealt with through the correct procedures and by the organisation with the appropriate responsibility and authority.