

Code of Practice for Freelance Practitioners

Scope of Policy

This policy applies to:



All freelance staff and artists.

Date of this revision: January 2025

To be reviewed: January 2026

Signatures Required

This document requires the following signatures:

Name	Title	Date	Signature
Hebe Reilly	Creative Director / CEO	3 April 2025	
Alyson Malach	(Chair Trustees)	3 April 2025	

Related policies

- Equality, Diversity and Inclusion Policy
- Safeguarding Adults Code of Practice
- Safeguarding Children and Young People Code of Practice
- Health and Safety Policy
- GDPR Guide for Freelancers
- Health and Safety Policy

Code of Practice for Freelance Practitioners

The following code of good practice has been written to inform practitioners about the procedures of Cartwheel Arts and to assist and guide contracted practitioners in delivering work that supports Cartwheel's mission, aims and objectives. Our freelance practitioners are often the face of Cartwheel and we value the work of our freelance team. In turn, we want practitioners to feel valued, supported, and informed. We welcome feedback, suggestions, and ideas for improvements.

Mission

Our mission is to co-create inclusive artistic opportunities with diverse communities that enhance health & wellbeing and celebrate culture and heritage. We call this Art for a Reason.

Throughout its work Cartwheel will endeavour to offer equality of opportunity, and to treat all who work with us honestly and with respect as per our Equality, Diversity and Inclusion Policy.

Policies and this Code of Practice

It is imperative that all freelance practitioners working with the public read the following key policies and documents as part of their contract:

- Freelancer Code of Practice
- Equality, Diversity and Inclusion Policy
- Safeguarding Adults Code of Practice
- Safeguarding Children and Young People Code of Practice
- Health and Safety Policy
- GDPR Guide for Freelancers

Cartwheel understands the time commitment involved to read and digest these policies and will endeavour to provide the policies above in accessible formats, provide informational sessions and answer questions regarding these policies in a timely manner.

Health and Safety

Practitioners working for Cartwheel Arts **must**:

- Read and follow Cartwheel's Health and Safety policy.
- Be aware of current Cartwheel safety procedures for both face to face and (where relevant) online delivery.
- Where necessary, conduct appropriate risk assessments in conjunction with the Project Manager.
- Read and fully understand the project risk assessment and their role within it.
- Make themselves aware of the issues of health and safety at each venue and implement procedures at all times.
- Notify the Project Manager, or failing that, the Director immediately if you believe that it is unsafe to begin, or continue, with a session.
- Use your initiative in suspending a session if you believe it is necessary.

Safeguarding

The Managing Director, Karen Beal, is the Designated Safeguarding Lead for Cartwheel Arts. Many of our sessions are with either vulnerable adults, children and/or young people.

Practitioners working for Cartwheel **must**:

- Have read the Cartwheel Arts Safeguarding Code of Practice documents and fully understand their responsibilities. This document includes the procedure for reporting safeguarding concerns.
- Where necessary, provide Cartwheel Arts with details and sight of an up-to-date DBS certificate, or access to view it online. Cartwheel Arts are able to provide checks for practitioners via a third party but practitioners are responsible for payment of this.
- State when their latest Safeguarding training was undertaken on the digital contract. Where training was undertaken more than 3 years previous to the date of signing the contract, Cartwheel may request this is undertaken in the practitioner's own time. Cartwheel can signpost to providers who offer this training free of charge & in an accessible format.
- Ensure any data collected is done so in line with Cartwheel's data protection policy and practices and ensure confidentiality is maintained as appropriate to any safeguarding concerns.

Cartwheel will aim to provide one Safeguarding training course per year for freelance practitioners to attend without charge.

Artistic Practice

We expect practitioners working for Cartwheel to:

- Offer a high level of artistic and professional service.
- Demonstrate art skills in a clear and stimulating way when working with groups.
- Encourage participants to acquire new skills.
- Have a wide knowledge of particular art form(s) and how to employ them in a range of community settings.
- Commit to their own Continued Professional Development (CPD). Cartwheel Arts are passionate about supporting practitioners to develop their skills and have developed a dedicated [Artists Newsletter \(sign up form\)](#) to share opportunities, as well as supporting our contracted practitioners wherever possible.

Working with Groups

We expect practitioners working for Cartwheel to:

- Implement equal opportunities for all participants in accordance with Cartwheel's Equality, Diversity and Inclusion policy and to manage and/or report discriminatory instances during workshops.
- Remain impartial, when working with groups who are exploring particular issues and concerns.

- Be supportive, non-judgmental and sensitive to the needs of all individuals working within a group.
- Be honest at all times.

Accountability

Practitioners working for Cartwheel **must**:

- Read, understand, and sign their contract and the [Terms of Work Agreement](#) **before** a project starts, and in each subsequent year they work with the organisation.
- Fulfil all contractual obligations.
- All practitioners are required to have their own public liability insurance in place which covers themselves and the group they are working with, and to provide Cartwheel with the policy number, insurer, and expiry date in advance of beginning any project.
- Produce relevant documentation in support of freelance status and self-employment.
- Liaise appropriately with fellow practitioners, the Project Manager and Cartwheel staff, including reporting any issues immediately after the workshop (or during, if an emergency).
- Implement contingency plans, if necessary, with approval of the Project Manager.
- Agree responsibilities with the Project Manager for evaluating, monitoring and documenting the contracted work.
- Work in line with Cartwheel's policies and procedures regarding confidentiality and data protection.

Self-Management

Although the ultimate responsibility for any project lies with Cartwheel, freelance practitioners will be responsible for:

- Good time keeping throughout the contracted period.
- Transport of yourself and any materials and equipment to and from the venue. ***Please note we only pay travel expenses in exceptional circumstances such as if we are asking you to commute a significant distance outside of Greater Manchester to complete a contract. If you are traveling within Greater Manchester, we do not provide expenses***

At times, freelance practitioners may be asked to independently gather any specialised materials, resources, and basic refreshments for sessions. This will be agreed on a case-by-case basis and a clear brief and budget will be given by the Project Manager in advance. When providing materials or refreshments, practitioners should:

- Agree with the Project Manager on the expenditure and keep within a given budget – one-off purchases over £50 should be approved via email.

- Keep a clear record including receipts and evidence of purchases or use of their own resources.
- Attach receipts of anything purchased, and/or, an estimated value of own resources to invoices for reimbursement (this can be done at any time and the Project Manager can also support in purchasing materials using company credit cards should this be needed).
- Notify the Project Manager in advance if there is a change in either the materials sourced or the cost.
- Consider culturally appropriate materials & food that accommodate the tastes & wishes of the group. This should be agreed in advance with the Project Manager, and any project partners, including participants.
- 'Refreshments' refers to long-lasting items such as tea, coffee, juice & biscuits. Freelance practitioners are not expected to prepare or provide hot, catered food or meals for sessions.

Where providing materials or refreshments requires a significant time commitment or planning on the part of the practitioner, this must be discussed with the Project Manager who will support to ensure the practitioner is either reimbursed appropriately or tasks are reduced to be proportionate to their contracted responsibilities.

GDPR

Practitioners working for Cartwheel ***must***:

- Have read the Cartwheel Arts GDPR Guide for Freelancers and fully understand their responsibilities. It is vital that everyone understands their role within information governance. If you have any questions or concerns about this guidance or your role within it, please contact Karen on karen@cartwheelarts.org.uk or 01706 361300 who will be very happy to talk through it with you.
- Work with the Project Manager to agree how participant and sensitive information will be stored, protected and disposed of, in-line with our GDPR policy.
- Sign the confidentiality statement that is stored either in hard copy in a locked cabinet at our office or digitally on our password protected Drive.
- Cartwheel keeps freelance contracts and invoices for 10 years and project records for a minimum of 5 years however some information is retained indefinitely as historical archives.

Roles and Responsibilities

Cartwheel Arts will:

- Have overall responsibility for the project
- Pay invoices on time and correctly
- Be approachable and available
- Have overall responsibility for project planning unless agreed otherwise

- Have the right to observe the project in action
- Provide support where needed and asked for
- Keep freelance practitioners informed on the budgetary position and any changes
- Follow our complaints procedures to manage any disputes that arise during a project
- Provide the practitioner with:
 - All relevant policies for their contract in a format that suits their needs
 - Offers for induction and training around key policies. Training may take place in person or online depending on availability and Cartwheel require Safeguarding training to be in date within 3 years of contract.
 - Risk assessments and other documents relevant to the project – ensuring a First Aider is present at all sessions.
- Any breach of confidentiality will be addressed through a formal procedure, which may include the following steps:
 - A formal meeting with a senior member of Cartwheel Arts staff and a witness / minute taker
 - Further training, guidance, and support to understand the Information Governance Policy
 - Monitoring during sessions or working hours
 - If Cartwheel have serious concerns about the risk of a confidentiality breach and its impact, and the above steps have been taken, we reserve the right to terminate current freelance contracts.
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The Freelance Practitioner will:

- Fulfil all aspects of the contract.
- Be accountable to Cartwheel for the development and delivery of the project.
- Keep Cartwheel informed of the progress and any changes to the project in a manner and frequency agreed with the Project Manager at the start of the project.
- Allow Cartwheel access to the project (notwithstanding the wishes of the client group).
- Keep records and documentation as appropriate and in-line with our GDPR policy and guidance.
- Keep the Programme Coordinator sufficiently informed of the sessions – this can be via email updates; WhatsApp Voice Notes or other accessible form of communication – the format & frequency to be agreed on a project-by-project basis.
- Supply invoices for fees, and receipts to claim materials, clearly marked with the project name and following Cartwheel's invoicing guidelines.

- Not make any budgetary decisions over £50 without consultation. Please email the Project Manager who has contracted you with details of the purchase to seek approval.
- Fully understand or seek clarity on:
 - Health and Safety issues
 - Equality, Diversity and Inclusion concerns
 - Safeguarding concerns
- Work within Cartwheel's aims and objectives:
<http://www.cartwheelarts.org.uk/about-us/vision-mission-and-values/>
- Work within the company's policies.
- Attend all required training around company policies.

This Code of Practice will be reviewed every year as standard however more frequent reviews may take place in response to changing landscapes of the sector or feedback from our valued practitioners.

Feedback:

You can feedback to Cartwheel Arts about this Code of Practice or any other concerns in any of the following ways:

- Contact the Project Manager who contracted you – this will be reviewed immediately with the individual providing feedback.
- [Complete our anonymous practitioner survey](#) – this will be reviewed monthly by the Managing Director and reported to the CEO/Creative Director and the board accordingly on action needed.
- For complaints, please follow our complaints procedure set out in our [Complaints Policy](#)

Accessibility:

Cartwheel Arts are committed to providing accessible opportunities for practitioners with disabilities and can discuss individual adjustments required in the planning stages of a project. This could include but is not limited to:

- Providing documents in accessible formats
- Working with the practitioner to understand and meet any requirements in regards to meetings - i.e. offering online / telephone or in person as required.
- Providing clear information regarding transport to and from venues, and, if required, can communicate with venues and advocate for an accessible parking space.

Policy Revisions

This policy will be reviewed annually, and any amendments made as necessary or earlier if changes to national legislation or operational procedures at Cartwheel Arts occur. All policies are subject to the Board of Trustees approval.

Appendix 1: Guidance for freelance Project Managers

The following guidance is additional to the above Freelancer Code of Practice and offers specific advice to Freelance Project Managers working with a Cartwheel Programme Coordinator or Director.

Terms:

- Project Manager – refers to a project manager / coordinator contracted on a freelance basis
- Programme Coordinator – refers to a member of Cartwheel's PAYE staff and could, at times include a Company Director.

Contracting & Communications

The Cartwheel Programme Coordinator will:

- Provide a contract with clear expectations of the work to be delivered
- Provide clearly written responsibilities for both the Project Manager & Coordinator so both parties are aware of who should be doing what
- It may also be useful to provide the Project Manager with information about your schedule, and how much time you have available to support
- Set up regular 1-2-1's and supervisions to ensure the Freelance Project Manager has adequate information and support.
- Regularly check in and review hours with Freelance Project Manager to ensure the work is feasible in the required hours. When appropriate, this may include an agreed break-down or allocation of contracted hours.
- Set up a company email address for the Project Manager – through which all project related communications should be made
- Set up a shared folder within the Cartwheel shared drive – within which all project documents should be saved
- Inform the Freelance Project Manager of any significant changes or updates to the project at the earliest convenience, including any periods of absence, or particularly busy periods

The Freelance Project Manager will:

- Keep the Programme Coordinator sufficiently informed of the sessions – this can be via email updates, WhatsApp Voice Notes or other accessible form of communication – the format & frequency to be agreed on a project-by-project basis.

Budgets & Finance

Freelance Project Managers may be given a budget to manage, which may include direct activity costs such as artist fees, materials & venue hire.

The Cartwheel Programme Coordinator will:

- Provide information regarding the budget and expectations of the relevant funding body, including any reporting or monitoring required
- Where materials or refreshments are required to deliver the project, the Coordinator will agree the best approach with the Project Manager. This may include:
 - The project manager purchasing items, and then claiming the expenses by evidencing receipts on an invoice
 - The Coordinator purchasing items and then arranging drop off or collection with the project manager to ensure they are available for the session

The Freelance Project Manager will:

- Discuss any changes to the budget above £50 with the Programme Coordinator in advance, and not commit to any changes in expenditure without approval.
- Supply invoices for fees, and receipts to claim materials, clearly marked with the project name and following Cartwheel's invoicing guidelines.
- Please be aware that Cartwheel review practitioner rates regularly and set fair and transparent rates of pay. Rates of pay for practitioners are agreed with the funding body at the time of applying for the grant and usually remain in place for the entirety of the grant fund.
- The Freelance Project Manager should not negotiate higher rates of pay directly with an alternative freelancer without first obtaining the explicit consent of the Programme Coordinator

Contracting Artists & Practitioners

The Cartwheel Programme Coordinator will:

- Be responsible for contracting and inducting any additional freelancers eg. Artists who will be working on the project.
- The documents and information required from additional freelancers can be found in our Freelancer Code of Practice. It is the Programme Coordinator's responsibility to collect and store these confidentially
- Artists' completed contracts and other information will be stored confidentially and will not usually be shared with other freelance practitioners unless information pertains to health & safety (eg. a health condition or serious allergy) or is vital to the delivery of the project (eg. dates an artist may be unavailable)

The Freelance Project Manager will:

- Signpost potential practitioners & artists for a session to the Programme Coordinator who will lead on recruitment, contracting and induction

Health & Safety

The Cartwheel Programme Coordinator will:

- Provide a Risk Assessment for all activity and share this directly with the Project Manager, Practitioners, venues, and other relevant parties
- It is the responsibility of the Programme Coordinator to identify and agree a Designated First Aider at each session. This may include
 - A member of Cartwheel PAYE staff with up-to-date training
 - A freelance Project Manager with up-to-date training
 - An artist or practitioner with up-to-date training
 - A member of staff at the hosting venue eg. a teacher at a school or a member of staff at a community centre
- Designated First Aiders should not be volunteers or participants
- Agree with the Project Manager on the required levels of support for each session.
- Depending on the nature of the session, and the relationship we have with the hosting / partner organisation, the Programme Coordinator & Project Manager will agree on the level of support required in advance of the sessions
- It is the responsibility of the Coordinator to check in with the practitioners attending the session, the partner venue and the participants regarding the level of support, and to provide additional support if required

The Freelance Project Manager will:

Update the Programme Coordinator on the nature of the session, and make any recommendations for the level of support required, providing ongoing feedback as required

- Ensure they have read and understand the Risk Assessment for the project
- Fully understand or seek clarity on:
 - Health and Safety issues
 - Equality, Diversity and Inclusion concerns
 - Safeguarding concerns
- Work within Cartwheel's aims and objectives:
<http://www.cartwheelarts.org.uk/about-us/vision-mission-and-values/>
- Work within the company's policies.
- Attend all required training around company policies.
- Any concerns or issues should be reported to the Programme Coordinator as soon as possible

GDPR & Handling Sensitive Data

Freelance Project Managers may be asked to distribute and collect information from participants including monitoring forms, photo consent and project evaluation forms.

The Programme Coordinator will:

- Ensure the project manager has access to the required forms and information, including at what stage in the project, and how frequently forms must be filled out
- Offer support and assistance, including attending sessions to collect forms immediately when required

The Freelance Practitioner will:

- Keep records and documentation as appropriate and in-line with our GDPR policy and guidance. In practice, this could include:
 - Saving all digital files and records within the Google Drive associated with their @cartwheelarts.org.uk email address, and not in their personal Google Drives.
 - Photographing sensitive information, uploading to the Shared Drive and then deleting from any personal devices & confidentially destroying the paper-work.
 - Confidentially destroying paper-work includes shredding, incinerating or, if these options are not possible, returning to Cartwheel's office in a sealed envelope to be destroyed at the office.
 - If you are concerned about keeping records confidential please contact the Programme Coordinator immediately

Appendix 2: Guidance for Freelance Practitioners supporting recruitment & selection

On occasion, Cartwheel Arts may invite members of our freelance team to support our interview and selection process by joining interview panels. This practice ensures diverse perspectives and expertise are brought to the selection process

This may include the interview and selection process for new PAYE staff, freelance staff including artists and Trustees.

When inviting freelancers and volunteers to support the interview and selection process, Cartwheel will:

In advance of the interviews:

- Provide clear information about the role, including the Job Description and Person Specification, to ensure panel members are fully informed
- Provide the date and times of the interview panel, including any additional time required after the process for shortlisting
- Issue a formal agreement specifying any fees, travel expenses, and terms of engagement
- Share the agreed interview questions with the panel, indicating which panel members will ask which questions.
- Candidates should not be asked supplementary questions unless agreed upon by the panel beforehand to ensure consistency and fairness."
- Ask panel members for any access requirements and to disclose any conflicts of interest

On the day of the interviews:

- Provide the anonymised application forms of the candidates invited to interview for review during the day. Ensure that the anonymised application forms are presented in a consistent format for ease of comparison.
- Provide a printed or electronic scoresheet with clear instructions and examples of how to use the scoring system effectively.
- At times, Cartwheel may specify some balancing criteria that will be used to score candidates who are closely tied eg. identifying one or two areas of the Job Description that are deemed most important, and giving these answers a higher potential score
- Provide any additional guidance, or support as required

Following the interview:

- The most senior member of Cartwheel Arts staff will be responsible for informing all candidates of the outcome

- Cartwheel will provide candidates with feedback upon request. This will be an anonymised summary of the scores and feedback provided by all the interview panellists, gathered from the official score sheets and will usually be shared confidentially with the candidate via email (other forms of communication available upon request)

Freelance Practitioners will:

- Read and review the information provided in advance or on the day
- Disclose any conflicts of interest and inform Cartwheel of any access requirements. This includes any prior professional or personal relationship with a candidate that could influence impartiality
- Follow the guidance set out in the scoring sheet, and mark the candidates based on the objective information they provide
- At the end of the day, return all documents relating to the interview, including applications and score sheets to Cartwheel Arts. These must not be taken out of the interview room at any time.
- Follow Cartwheel's Equality, Diversity & Inclusion policy
- Follow Cartwheel's Information Governance Policy & Procedures & Information Governance & Data Protection Guidelines for Freelance Practitioners
- **Maintain confidentiality at all times.** This includes:
 - Not disclosing the names or identities of any of the candidates
 - Not disclosing the name or identity of the successful candidate ahead of Cartwheel Arts making an official, public announcement
 - Not disclosing any of the details or information shared during the interviews with anyone – including the candidates
 - If candidates request feedback on the interview to you personally, please direct them to the most Senior Cartwheel Staff member who attended the interview – they will be able to provide the candidate with anonymous feedback from the panel.