



Whistleblowing Policy

Speaking up about wrongdoing, unsafe practice and safeguarding failures

Control	Detail
Organisation	Peopleton Brook Care Farm
Policy owner	Jake Payne, Business Manager
Effective from	01/09/2026
Review due	August 2027, or earlier if law, guidance or organisational arrangements change

Speak up promptly. You do not need proof, permission from a manager, or certainty that wrongdoing has occurred. If anyone is in immediate danger, call 999 first.

1. Purpose and policy commitment

Peopleton Brook Care Farm (PBCF) encourages people working with or for the farm to speak up promptly about wrongdoing, unsafe practice, safeguarding failures or concealment. Concerns will be listened to, assessed fairly and handled by a person who is not implicated in the matter.

PBCF will not tolerate dismissal, disadvantage, threats, bullying, loss of work, adverse references or other retaliation because someone raised a concern they reasonably believed to be true. This organisational promise applies more widely than the statutory employment-law protection described below.

This policy is a reporting route, not an emergency plan or an investigation manual. Immediate safety, safeguarding and statutory notifications must be managed under the relevant controlled policy without waiting for the whistleblowing process.

2. Scope and legal status

The policy may be used by employees, workers, agency staff, apprentices, contractors, consultants, volunteers, work-placement students, former workers and professionals working alongside PBCF. A concern may be raised about PBCF, someone working at the farm, a supplier, contractor or another organisation connected with the work.

Most employees and workers, including agency workers, may receive statutory protection under the Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 when they make a protected disclosure through an appropriate route. Genuinely self-employed people and volunteers without an enforceable employment contract are not usually protected by that legislation. PBCF nevertheless accepts concerns from them and applies its no-retaliation commitment.

Children, young people, adult participants, families and visitors should normally use the Complaints and Concerns Procedure or safeguarding route. If the substance of what they report indicates wrongdoing or danger, PBCF will route and protect the concern according to its substance rather than reject it because the wrong label was used.

3. What whistleblowing means

A statutory qualifying disclosure is information that the worker reasonably believes tends to show one or more of the following and is disclosed in the public interest:

- a criminal offence has occurred, is occurring or is likely to occur;
- a person has failed, is failing or is likely to fail to comply with a legal obligation;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health or safety of any person has been, is being or is likely to be endangered;
- the environment has been, is being or is likely to be damaged;
- sexual harassment has occurred or is likely to occur (a specific qualifying category from 6 April 2026);
- information about any of those matters has been, is being or is likely to be deliberately concealed.

The reporter does not have to prove the concern or be correct. The test is reasonable belief and public interest, not whether the concern was raised in 'good faith'. Motive must not be used to dismiss information that may reveal wrongdoing.

4. Examples relevant to the farm

- a safeguarding concern being ignored, minimised, delayed or deliberately concealed;
- unsafe supervision, transport, animal handling, machinery use, lone working, infection control or fire practice;
- failure to follow legal duties, commissioner requirements or required referral and notification routes;
- fraud, bribery, theft, false records, misuse of public or charitable funds, or dishonest procurement;
- serious data misuse, deliberate deletion of evidence or unlawful access to records;
- discrimination, sexual harassment or another systemic practice affecting others; or
- retaliation against a person who raised a concern or assisted an investigation.

A risk to reputation on its own is not a statutory whistleblowing category. It may be relevant only where the underlying facts indicate one of the types of wrongdoing above.

5. Choosing the correct route

Do not delay action while deciding which policy name applies. The person receiving the information must route it correctly and tell the reporter which process will be used.

Concern	Immediate route
Immediate danger, serious injury, fire or crime in progress	Call 999; then follow the Emergency Response Plan and inform the appropriate lead as soon as practicable.
Concern that a child or adult may be at risk	Use the Safeguarding and Child Protection or Adult Safeguarding Policy immediately. Whistleblowing may run alongside it.

Concern	Immediate route
Adult working with children may have harmed a child, pose a risk, committed an offence or be unsuitable	Use the harm-threshold/allegations route and obtain LADO advice through the controlled safeguarding contacts. Do not investigate first.
Staff conduct below the harm threshold	Use the Staff Behaviour and Code of Conduct Policy and low-level-concern route. A wider safeguarding-practice failure may also be whistleblowing.
Personal employment problem affecting only the individual	Use the grievance or dignity-at-work route. If the facts also affect others or the public interest, both routes may apply.
Service concern raised by a participant, family or commissioner	Use the Complaints and Concerns Procedure unless the substance requires safeguarding, incident or whistleblowing action.

6. Immediate safeguarding and safety action

Whistleblowing never replaces immediate protective action. Any staff member may call 999, make a safeguarding referral or contact the appropriate external authority without managerial permission where delay could increase risk.

- Protect life and prevent further harm without putting yourself or others at unreasonable risk.
- Record the facts, time, place, people involved and action taken as soon as possible.
- Preserve relevant documents, messages, images, CCTV or equipment lawfully; do not search private systems, remove originals or gather evidence unlawfully.
- Do not confront the subject of the concern, question children or vulnerable adults unnecessarily, promise secrecy or discuss the matter widely.
- Follow the controlled safeguarding, serious-incident, data-breach, health-and-safety or emergency procedure in parallel.

7. Internal reporting routes

A disclosure may be made verbally or in writing. Internal reporting is encouraged because it can enable rapid action, but it is not compulsory where the reporter reasonably believes the route is unsafe, conflicted or ineffective.

Subject	Route
Safeguarding practice or child-protection failure	Designated Safeguarding Lead (DSL) or Deputy DSL. If either is implicated, use another unconflicted route below.
General wrongdoing, legal compliance, finance, health and safety or organisational practice	Jake Payne, Business Manager and Policy Owner, unless he is implicated.
Concern involving the Policy Owner or senior leadership	An unimplicated DSL/Deputy DSL for safeguarding; otherwise the commissioning body, relevant regulator/prescribed person, legal adviser or other appropriate external route.

Subject	Route
Concern involving all available internal recipients or fear of retaliation	Go directly to an appropriate prescribed person/body, the NSPCC line for child-protection failures, police/emergency services where required, or obtain independent advice.

A disclosure must never be sent to a person who is implicated in it. The recipient must declare any actual or perceived conflict and transfer the case securely to an independent handler.

8. How to raise a concern

Say that you are raising a whistleblowing or public-interest concern if you can. The label is not decisive: PBCF must assess the information provided. A written report is helpful but not required.

- your name and safe contact method, unless you choose to remain anonymous;
- the facts you know, including what happened or may happen, dates, places and people involved;
- why you believe the matter affects others or the public interest;
- whether anyone is at immediate risk and any protective action already taken;
- where the concern has already been reported and the response received; and
- documents or evidence already lawfully in your possession. Do not investigate or obtain more material unlawfully.

You may ask for a private meeting and may be accompanied by a trade-union representative or agreed workplace companion, provided this does not compromise safety, confidentiality or an external investigation.

9. Confidential and anonymous disclosures

PBCF will keep the reporter's identity confidential as far as practicable and restrict information to those who need it for safety, assessment, investigation, legal advice or required referral. Absolute confidentiality cannot be promised. Identity may need to be disclosed where required by law, necessary for fairness or safeguarding, or unavoidable in the circumstances. The reporter will be told before disclosure where lawful and practicable.

Anonymous reports will be assessed on their substance, seriousness, credibility, specificity and the ability to verify the information. Anonymous reporting can limit follow-up and feedback, so a safe contact method is encouraged where possible.

Confidentiality clauses, settlement agreements and internal instructions must not be used to prevent lawful whistleblowing, reporting a crime, contacting a regulator or prescribed person, or obtaining legal advice.

10. External and independent routes

A reporter may seek independent advice or make an external disclosure. Statutory protection can depend on who receives the information and on additional legal tests, so the reporter should use the current official prescribed-person list or take advice rather than assume every external disclosure is protected.

Need	External route
Immediate danger or crime in progress	999. Use 101 for non-emergency police matters where appropriate.
Child-protection failure in an organisation	NSPCC Whistleblowing Advice Line: 0800 028 0285; help@nspcc.org.uk. This is an alternative route when internal safeguarding concerns cannot be raised or are not being addressed.
Allegation about an adult working with children	The LADO for the local authority responsible for the allegation arrangements, using the current controlled safeguarding contact record.
Regulated wrongdoing	The correct prescribed person or body for the subject, for example HSE for relevant health-and-safety matters or the ICO for data-protection matters. Check the current GOV.UK list and the body's reporting instructions.
Independent employment/legal advice	Acas, a trade union, a solicitor or Protect. Advice services are not substitutes for 999 or an urgent safeguarding referral.
Commissioned placement or public-service concern	The relevant commissioning school, local authority or contract manager may need to be informed. Whether this is a protected-disclosure route depends on the legal circumstances.

11. What PBCF will do when a disclosure is received

1. Record and acknowledge: create a secure case record and, where a safe contact route exists, acknowledge normally within five working days.
2. Protect first: assess immediate safeguarding, health-and-safety, evidence-preservation and regulator-notification needs without waiting for an investigation.
3. Check independence: appoint a handler and decision-maker who are not implicated and have appropriate competence; obtain external HR, legal, safeguarding or technical advice where needed.
4. Triage: normally within ten working days, decide whether the matter is whistleblowing and which parallel procedures or external referrals apply. These are service targets, not reasons to delay urgent action.
5. Set a proportionate process: define the issues, evidence, confidentiality controls, contacts, expected timescale and review points. The reporter is a witness or information source, not the investigator.
6. Keep in contact: provide appropriate progress updates, explain material delays and give outcome information as far as lawful without exposing personal data, safeguarding information or disciplinary details.
7. Close and learn: record findings, rationale, actions, referrals, support, retaliation checks and organisational learning. Corrective action may continue after the reporter is told the case is closed.

12. Fair investigation and parallel procedures

The disclosure will be assessed on evidence and risk, not the reporter's status, motive, personality or relationship with the subject. The subject of an allegation will be treated fairly and will not be assumed culpable. Interim safeguards are neutral protective measures and must be reviewed.

Safeguarding, criminal, regulatory, disciplinary, capability, grievance, data-breach or serious-incident procedures may run in parallel. PBCF will coordinate them to avoid contaminating evidence or

frustrating an external investigation. Police, LADO, children's social care or another competent authority may direct the sequence.

If the reporter disagrees with PBCF's response, they may ask the unimplicated Policy Owner or approving authority to review whether the procedure was followed. This does not restrict the right to seek advice or use an appropriate external route at any time.

13. Protection, support and retaliation

No one may threaten, disadvantage, isolate, dismiss, reduce hours, withhold work or training, give an adverse reference, expose identity unnecessarily, or otherwise retaliate because a person raised or supported a concern. This applies to managers, colleagues, contractors and people acting on PBCF's behalf.

The case handler must agree a proportionate support and retaliation-monitoring plan with the reporter where contact is possible. Options may include a safe contact, temporary work adjustments, wellbeing support, trade-union or companion support, and planned check-ins. Adjustments must not themselves penalise the reporter.

Anyone who believes they are experiencing retaliation should report it immediately through an unconflicted internal route or obtain independent advice. Retaliation will be investigated separately and may lead to disciplinary or contractual action.

14. Deliberately false information

A concern that is mistaken, unsubstantiated or not upheld is not misconduct. No action will be taken merely because evidence is insufficient or the reporter's reasonable belief proves wrong.

If there is separate evidence that a person knowingly fabricated information or evidence, that conduct may be considered under a fair disciplinary, conduct or contractual process. The whistleblowing handler must not decide that issue simply because the original concern was not upheld.

15. Records, data protection and retention

- Store the disclosure, risk assessment, conflicts, referrals, investigation material, decisions and communications in a restricted case file separate from general personnel records unless a formal process requires a controlled copy.
- Record fact, source, date and rationale; distinguish allegations from findings and avoid unnecessary personal or special-category data.
- Share only what is necessary and lawful. Safeguarding information may be shared without consent where necessary to protect a child or adult at risk.
- Retain records under the Data Protection Policy and retention schedule, applying any longer safeguarding, employment, insurance, legal-hold or regulator requirement.
- Do not delete, alter or conceal relevant records once a concern is raised or reasonably anticipated.

16. Roles, training and assurance

The Policy Owner maintains the procedure, ensures unconflicted handling, monitors retaliation and arranges annual review. The DSL and Deputy DSL control safeguarding referrals and liaison. Managers must recognise and route disclosures even when the word 'whistleblowing' is not used. All staff and volunteers receive induction and periodic reminders on speaking up and external routes.

At least annually, the approving authority will receive an anonymised assurance report covering the number and themes of concerns, timeliness, conflicts, referrals, retaliation allegations, actions and learning. Small numbers and identifiable details must be suppressed. The review must test whether staff know how to bypass an implicated senior person.

Appendix A - Staff quick guide

If you remember only one thing: act on safety first, then report the facts through a route that is not conflicted.

Action	What to do
1. Danger now?	Call 999. Do not wait for permission.
2. Safeguarding?	Tell the DSL/Deputy DSL immediately, or use an external safeguarding route if they are implicated or unavailable and delay creates risk.
3. Record	Write the facts, dates, people, risk and action. Preserve what you already hold lawfully.
4. Report	Use Jake Payne for general wrongdoing unless implicated; use an unconflicted internal or appropriate external route otherwise.
5. Do not investigate	Do not confront, question repeatedly, search private systems, remove originals or discuss widely.
6. Keep secure	Use the approved reporting and storage route, not personal email, messaging apps or personal devices.
7. Watch for retaliation	Report any disadvantage, threats, isolation or adverse treatment immediately.
8. Escalate	If the concern is not addressed or the route is unsafe, use the correct prescribed body, NSPCC line, commissioner or independent advice.

Controlled internal contacts

Role	Name / purpose	Contact
Policy Owner / Business Manager	Jake Payne	jake@peopletonbrookfarm.co.uk
Designated Safeguarding Lead	Jo Garrad	jo@peopletonbrookfarm.co.uk
Deputy Designated Safeguarding Lead	Clarissa Saunders	clarissa@peopletonbrookfarm.co.uk
Emergency services	Police, fire or ambulance	999
NSPCC Whistleblowing Advice Line	Child-protection failures	0800 028 0285 help@nspcc.org.uk

Before approval, confirm these internal contacts against the controlled safeguarding and emergency contact records. Local-authority and regulator details must be taken from current official sources rather than copied into an uncontrolled list.

Appendix B - Whistleblowing case record checklist

Record area	Minimum content
Receipt	Case reference; date/time; method; recipient; reporter and safe contact (or anonymous); exact information disclosed.

Record area	Minimum content
Immediate risk	999/safeguarding action; child or adult at risk; health and safety; data/evidence preservation; urgent external notification.
Classification	Whistleblowing category and public-interest basis; parallel safeguarding, allegation, grievance, complaint, incident or breach route.
Independence	Conflict check; appointed handler and decision-maker; competence; external advice; information-access restrictions.
Plan	Issues; scope; evidence; witnesses; timescale; update dates; confidentiality limits; support and retaliation plan.
Actions and outcome	Referrals; investigation steps; decisions and rationale; communications; interim safeguards; findings; corrective action; feedback; review or external escalation; closure date.
Learning and retention	Improvements, owner, target and verification; record location; permissions; retention category; legal hold; disposal/review date.

Sources and related controlled policies

This policy is informed by the following sources current at the review date. External links should be checked at each review.

[Acas: Whistleblowing at work](#) - legal tests, coverage, detriment and response; updated 19 June 2026.

[GOV.UK: Whistleblowing for employees](#) - protected disclosures and routes.

[GOV.UK: Prescribed people and bodies](#) - current official external-route list.

[Keeping children safe in education 2026](#) - safeguarding practice and the NSPCC route; effective 1 September 2026.

[NSPCC Whistleblowing Advice Line](#) - child-protection whistleblowing advice.

[Business.gov.uk: 2026 whistleblowing protections](#) - sexual harassment category from 6 April 2026.

Related PBCF policies: Safeguarding and Child Protection; Adult Safeguarding; Staff Behaviour and Code of Conduct; Complaints and Concerns; Serious Incident; Health and Safety; Data Protection; Emergency Response; IT, Internet and Online Safety; Recruitment and Selection.

Approval record

Approval field	Entry
Approved by	Jake Payne
Role / authority	Business Owner
Approval date	06/08/2026
Signature / recorded decision	Jake Payne