

Whistleblowing Policy

Purpose

PMACTIVE is committed to maintaining a safe, open and accountable organisation where staff, volunteers and others working with us feel able to raise concerns about wrongdoing, unsafe practice or risks to children, young people, adults at risk, staff, volunteers or the organisation. PMACTIVE recognises that staff and volunteers may sometimes become aware of concerns that they believe need to be raised in the wider interests of the organisation or those we support.

The purpose of this policy is to provide a clear and confidential process for raising concerns and to ensure that individuals who raise genuine concerns in good faith are supported and protected from unfair treatment or retaliation.

What is Whistleblowing?

Whistleblowing occurs when a person raises a concern about serious wrongdoing, unsafe practice or unlawful activity within an organisation.

Whistleblowing may include concerns about:

- Serious safeguarding failures.
- Abuse, neglect or risk of harm to a child, young person or adult at risk.
- Unsafe working practices.
- Serious breaches of health and safety.
- Criminal activity.
- Fraud, theft or financial wrongdoing.
- Serious breaches of legal or regulatory requirements.
- Deliberate concealment of wrongdoing.
- Serious breaches of PMACTIVE policies or procedures.
- Serious misuse or inappropriate handling of confidential or personal information.
- Conduct that places children, young people, adults at risk, staff or volunteers at risk of harm.
- A failure by management to take appropriate action when serious concerns have been raised.

Whistleblowing is different from raising a personal grievance or making a complaint about an individual's employment. However, concerns may overlap and PMACTIVE will consider the most appropriate procedure for dealing with the matter.

Who Can Raise a Concern?

Concerns may be raised by:

- Employees.
- Sessional or temporary workers.
- Volunteers.
- Contractors or self-employed workers working on behalf of PMACTIVE.
- Students or placement workers.

- Other individuals working within or closely with PMActive.

Individuals do not need to be certain that wrongdoing has occurred before raising a concern. A genuine concern or reasonable suspicion should be raised so that it can be considered appropriately.

Raising a Concern

Where possible, concerns should initially be raised with PMActive Management.

A concern may be raised:

- Verbally.
- In writing.
- By email.
- During supervision or another management meeting.
- Through another appropriate person where the individual does not feel able to approach their immediate manager.

Individuals are encouraged to provide as much relevant information as possible, including:

- What has happened or is believed to have happened.
- Who is involved.
- When and where the concern occurred.
- Why the individual believes the matter is serious.
- Any evidence or information available.
- Whether anyone may be at immediate risk.

Individuals should not investigate the matter themselves or attempt to gather evidence in a way that could place themselves or others at risk.

Safeguarding Whistleblowing Concerns

Where a concern relates to the safety or welfare of a child, young person or adult at risk, it must be treated as a safeguarding concern. The concern should be reported immediately in accordance with PMActive's Safeguarding and Child Protection Policies.

Staff and volunteers should not delay reporting a safeguarding concern in order to follow the normal whistleblowing process.

Where the concern relates to a member of staff, volunteer, manager or safeguarding lead, PMActive's procedures for managing allegations against staff and volunteers must also be followed where appropriate.

Concerns About Management or the DSL

PMActive recognises that an individual may sometimes need to raise a concern about a manager, senior member of staff or the Designated Safeguarding Lead (DSL).

Where the concern relates to the DSL, the individual should raise the concern with another senior member of PMActive Management who is not involved in the matter.

Where the concern relates to PMActive Management or the person normally responsible for receiving whistleblowing concerns, the individual may raise the concern with another appropriate senior person or seek independent advice.

No individual should be prevented from raising a genuine concern because the concern involves someone in a position of authority.

Immediate Risk or Serious Concerns

Where there is an immediate risk of serious harm, staff and volunteers should prioritise the safety of the child, young person, adult at risk or other person involved. Emergency services should be contacted where necessary.

Where a safeguarding concern requires external referral, PMActive will follow the relevant safeguarding procedures and seek advice from the appropriate safeguarding authority or other relevant agency.

Confidentiality

PMActive will handle whistleblowing concerns sensitively and, wherever possible, confidentially. Information will only be shared with those who need to know in order to assess, investigate or respond to the concern, or where disclosure is required to protect someone from harm or meet a legal or safeguarding obligation.

PMActive cannot guarantee complete confidentiality where information needs to be shared with external agencies or authorities. Individuals raising concerns should also respect confidentiality and should not discuss the matter unnecessarily with colleagues, children, young people, families or others.

Protection from Victimisation

PMActive will not tolerate retaliation, victimisation, bullying or unfair treatment of an individual who raises a genuine concern in good faith. An individual will not be disadvantaged simply because they have raised a concern, even where the concern is subsequently found to be unsubstantiated.

Concerns about retaliation or victimisation following whistleblowing should be reported to PMActive Management immediately and will be taken seriously. Where an individual deliberately makes a false or malicious allegation, PMActive may take appropriate action. However, an individual will not be penalised simply because their concern could not be substantiated.

Investigation and Action

PMActive will determine the most appropriate way to respond to each concern. Depending on the nature of the concern, this may involve:

- An internal review or investigation.
- Management action.
- Safeguarding procedures.
- Disciplinary procedures.
- A review of risk assessments or working practices.

- Referral to an external safeguarding organisation.
- Referral to the police or another statutory authority.
- Seeking advice from an appropriate professional or regulatory body.

The person raising the concern will be kept informed where it is appropriate and lawful to do so. Due to confidentiality and data protection requirements, PMAActive may not always be able to provide details of the outcome of an investigation.

External Reporting

PMAActive encourages concerns to be raised internally wherever it is appropriate and safe to do so. However, individuals are not required to remain silent where they reasonably believe that an internal reporting route is inappropriate, ineffective or may place someone at further risk.

Where appropriate, individuals may seek independent advice about their concerns and their legal rights. PMAActive will not obstruct or discourage an individual from making a legitimate report to an appropriate external authority.

Staff and Volunteer Responsibilities

All staff and volunteers are responsible for:

- Taking concerns about serious wrongdoing or unsafe practice seriously.
- Reporting safeguarding concerns without delay.
- Following PMAActive's safeguarding and whistleblowing procedures.
- Maintaining appropriate confidentiality.
- Not investigating concerns themselves unless specifically authorised to do so.
- Co-operating honestly with any investigation.
- Treating colleagues and others involved in a concern fairly and respectfully.
- Reporting any retaliation, victimisation or intimidation connected to whistleblowing.

Staff and volunteers should never ignore or dismiss a concern because they believe someone else will report it.

Management Responsibilities

PMAActive Management is responsible for:

- Promoting an open culture where concerns can be raised without fear.
- Ensuring staff and volunteers understand how to raise concerns.
- Taking concerns seriously and responding appropriately.
- Ensuring safeguarding concerns are dealt with through safeguarding procedures.
- Ensuring concerns are investigated appropriately and impartially.
- Protecting individuals from victimisation or retaliation.
- Maintaining appropriate records.
- Ensuring confidentiality and data protection requirements are followed.
- Reviewing concerns to identify learning and improvements.
- Taking appropriate action where wrongdoing or unsafe practice is identified.

Recording and Monitoring

Whistleblowing concerns will be recorded securely and handled in accordance with PMActive's Data Protection and Confidentiality Policy.

Records may include:

- Date the concern was raised.
- Nature of the concern.
- Person receiving the concern.
- Actions taken.
- Any referrals made.
- Outcome or actions arising from the concern.
- Any lessons or improvements identified.

Information will only be retained for as long as necessary and in accordance with PMActive's data retention arrangements.

Learning and Improvement

PMActive will use whistleblowing concerns, where appropriate, to identify weaknesses in practice and make improvements to:

- Safeguarding arrangements.
- Policies and procedures.
- Staff and volunteer training.
- Risk assessments.
- Management oversight.
- Health and safety.
- Organisational practice.

The purpose of whistleblowing is not simply to identify wrongdoing but also to help ensure PMActive remains a safe, responsible and accountable organisation.

Related Policies

This policy should be read alongside:

- Safeguarding Children and Young People Policy.
- Safeguarding Adults Policy.
- Managing Allegations Against Staff and Volunteers Policy.
- Staff and Volunteer Code of Conduct.
- Complaints and Compliments Policy.
- Health and Safety Policy.
- Data Protection and Confidentiality Policy.
- Lone Working Policy.

Review

This policy will be reviewed regularly and updated where necessary to reflect changes in legislation, safeguarding guidance, organisational practice or identified learning.

Policy Reviews:

Policy Written: April 2024

Reviewed: September 2025

Reviewed: June 2026

