

Whistleblowing Policy

Last updated: 25th June 2026

Next review: 25th June 2027

1. Our commitment

Participation People is committed to maintaining the highest standards of openness, integrity and accountability across everything we do.

We encourage anyone working with or alongside Participation People to speak up if they have genuine concerns about wrongdoing, malpractice or unethical behaviour. We believe concerns should be raised without fear of retaliation and are committed to ensuring they are taken seriously, investigated appropriately and handled as confidentially as possible.

This policy reflects our commitment to creating a culture where people feel confident to raise concerns in the public interest.

2. Purpose

This policy explains how Participation People supports individuals who wish to report concerns about suspected wrongdoing or malpractice.

It also outlines how concerns will be managed fairly, confidentially and in accordance with relevant legislation.

3. Scope

This policy applies to:

- employees
- workers
- agency workers

- contractors
- subcontractors
- suppliers
- volunteers
- anyone carrying out work on behalf of Participation People.

We encourage anyone connected with our organisation to report genuine concerns where they believe wrongdoing may have occurred.

This policy relates to concerns that are raised in the public interest. Personal employment concerns should normally be addressed through the appropriate grievance procedure.

4. What concerns can be reported?

Concerns covered by this policy include suspected:

- fraud or financial malpractice
- breaches of legal obligations
- criminal activity
- dangers to health and safety
- environmental damage
- unethical or improper conduct
- miscarriages of justice
- deliberate concealment of any of the above.

This list is not exhaustive, and other matters of significant public interest may also fall within the scope of this policy.

5. Legal protection

Participation People supports the legal protections provided under the Public Interest Disclosure Act (PIDA).

Individuals who raise genuine concerns in the public interest and reasonably believe the information they disclose to be true will not be subjected to victimisation, retaliation or unfair treatment because they have spoken up.

We are committed to ensuring concerns are handled fairly and respectfully.

Knowingly making false or malicious allegations, however, may result in disciplinary action where appropriate.

6. Raising a concern

If you have a concern that you believe falls within the scope of this policy, we encourage you to raise it as soon as reasonably possible.

Concerns can be reported by contacting Participation People directly via **concerns@participationpeople.com**. Your disclosure will be reviewed and passed to the most appropriate person to investigate.

Where appropriate, you may also choose to contact the Chief Executive Officer, or a team member, directly.

When raising a concern, it is helpful to include:

- details of the suspected wrongdoing
- the names of any individuals involved (where known)
- any relevant evidence or supporting information
- the outcome or action you are seeking, where applicable.

We may contact you for further information if this is needed to help us understand or investigate your concern.

7. Confidentiality

Participation People understands that raising concerns can be difficult.

We will treat all whistleblowing disclosures as confidential wherever possible.

There may be circumstances where confidentiality cannot be fully maintained because of the requirements of an investigation or legal proceedings. Where this is necessary, we will discuss this with the individual wherever possible and continue to ensure they are protected from unfair treatment for making a genuine disclosure.

8. Anonymous disclosures

Anonymous concerns may be considered where sufficient information has been provided to allow an effective investigation.

However, anonymous disclosures can be more difficult to investigate and verify. For this reason, individuals are encouraged to identify themselves whenever they feel able to do so.

When considering anonymous disclosures, Participation People may take into account:

- the seriousness of the concern
- the credibility of the information provided
- whether the allegation can reasonably be investigated.

9. Investigating concerns

All whistleblowing concerns will be assessed promptly and investigated as appropriate.

The nature and length of an investigation will depend on the circumstances of each case.

Where possible, the individual raising the concern will be kept informed of progress and advised when the investigation has concluded.

Everyone involved in an investigation is expected to cooperate fully and maintain appropriate confidentiality throughout the process.

10. External disclosures

We encourage anyone with a concern to raise it directly with Participation People first, wherever it is safe and appropriate to do so. This gives us the opportunity to investigate and respond promptly.

However, where appropriate or required by law, concerns may also be reported to an independent prescribed person or regulatory body, such as the Health and Safety Executive, a local authority or another relevant regulator.

11. Appeals

If an individual is dissatisfied with how their concern has been handled or with the outcome of an investigation, they may request a review.

The grounds for the appeal should clearly explain why the individual believes the concern has not been dealt with appropriately.

The appeal will be reviewed independently where possible, and the individual will be informed of the outcome. The outcome of the appeal will normally be final.

12. Protection from victimisation

Participation People will not tolerate retaliation against anyone who raises a genuine concern under this policy.

If you believe you have experienced retaliation or unfair treatment after making a disclosure, please let us know as soon as possible by contacting the person handling your disclosure, the Chief Executive Officer, or another appropriate senior leader if your concern relates to the CEO or you do not feel comfortable contacting them.

Any victimisation, harassment or detrimental treatment connected with a protected disclosure will be treated seriously and may result in appropriate action.

12. Governance

Participation People is committed to promoting an open and ethical culture in which concerns can be raised confidently and addressed appropriately.

This policy supports our wider commitment to accountability, safeguarding, legal compliance and continuous improvement.

13. Relevant legislation

This policy is informed by and operates alongside relevant legislation, including:

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996
- Health and Safety at Work etc. Act 1974
- any other applicable UK legislation relating to whistleblowing and employment rights.

14 Review

This policy will be reviewed annually, or sooner where legislative changes, organisational learning or best practice require it.