

PURE JOY ADVENTURES

Whistleblowing Policy and Procedures

Speaking up about concerns, safely and without detriment

Policy version	1st Edition
Date adopted	May 2025
Review date	May 2026 (review overdue)
Approved by	Directors of Pure Joy Adventures Limited
Policy owner	Designated Safeguarding Lead
Applies to	All staff, volunteers, contractors and agency workers

1. Introduction and Purpose

PURE JOY ADVENTURES operates a Short Break Respite Scheme providing enriching activities and short breaks for children, young people and vulnerable adults. We are committed to creating an environment in which all concerns about wrongdoing, malpractice, safeguarding risks or illegal activity can be raised freely, without fear of victimisation or detriment.

This Whistleblowing Policy exists to reassure all workers, volunteers and partners that it is safe and acceptable to speak up. Given that our scheme involves the care and wellbeing of vulnerable individuals, early disclosure of concerns is especially important to safeguard those in our care.

Whistleblowing — formally known as making a 'protected disclosure' — is distinct from a personal grievance. It relates to concerns about conduct that affects others or the public interest, not just the individual raising the concern.

2. Scope

This policy applies to all individuals working for or with PURE JOY ADVENTURES, including:

- Employed staff (full-time, part-time, sessional and bank staff)
- Volunteers and student placements
- Agency and contracted workers
- Trustees and directors
- Partner organisations delivering elements of the Short Break Respite Scheme

This policy covers concerns raised about matters that occur within PURE JOY ADVENTURES's activities, including during short breaks, adventure activities, residential respite stays, transport arrangements and any associated provision.

3. What Should Be Reported

You should raise a concern under this policy if you reasonably believe (you do not need proof) that one of the following has occurred, is occurring, or is likely to occur:

3.1 Safeguarding and Child/Vulnerable Adult Protection

- Abuse, neglect or harm — or risk of harm — to a child, young person or vulnerable adult in our care
- Grooming behaviours by any member of staff, volunteer or contractor
- Failure to follow mandatory safeguarding procedures or reporting requirements
- Inappropriate relationships between workers and participants on the scheme
- Unsafe practices during adventure activities, transport or overnight respite stays

3.2 Criminal Conduct and Legal Breaches

- Criminal offences, including theft, fraud or financial misconduct involving scheme funds
- Breaches of health and safety legislation during activities (e.g. risk assessments ignored)
- Unauthorised disclosure of personal data relating to participants or families

- Failure to comply with licensing, insurance or regulatory requirements

3.3 Organisational Malpractice

- Misuse of charitable or public funds intended for the Short Break Respite Scheme
- Falsification of records, attendance sheets, care plans or incident reports
- Failure to report accidents, near misses or safeguarding incidents as required
- Cover-up of information relevant to the safety or welfare of scheme participants
- Serious breaches of PURE JOY ADVENTURES's policies and procedures

4. How to Raise a Concern

4.1 Internal Reporting

In the first instance, concerns should be raised with your line manager or the Designated Safeguarding Lead (DSL). If your concern relates to that person, or you are uncomfortable speaking to them, you may raise it with the Trustees of PURE JOY ADVENTURES directly.

Role Contact Method

Designated Safeguarding Lead Contact via Pure Joy Adventures main office

Director / Senior Manager Contact via Pure Joy Adventures main office

Confidential Whistleblowing Line Speak directly to a Director in confidence

4.2 Anonymous Reporting

Concerns may be raised anonymously. However, please be aware that anonymous reports may be more difficult to investigate fully. PURE JOY ADVENTURES will take all anonymous concerns seriously and investigate to the fullest extent possible.

4.3 External Reporting

If you believe your concern has not been addressed internally, or if you feel unable to raise it internally, you may contact an external prescribed body. Depending on the nature of your concern, relevant bodies include:

- Ofsted — concerns about child welfare or the running of regulated services: 0300 123 4666
- Local Authority Designated Officer (LADO) — concerns about adults working with children
- Care Quality Commission (CQC) — concerns about care standards
- Health and Safety Executive (HSE) — concerns about health and safety: hse.gov.uk
- Protect (formerly Public Concern at Work) — independent whistleblowing charity: 020 3117
- Police — if a crime is being committed or you believe someone is in immediate danger: 999 / 101

5. Confidentiality

PURE JOY ADVENTURES will treat all whistleblowing disclosures with the utmost confidentiality. The identity of the person raising a concern will not be disclosed without their consent, unless we are legally

required to do so or disclosure is necessary to protect the safety of a child, young person or vulnerable adult.

We recognise that confidentiality is particularly important in a small, close-knit team environment such as our Short Break Respite Scheme. Every reasonable step will be taken to handle disclosures discreetly.

6. Protection from Detriment (Non-Retaliation)

PURE JOY ADVENTURES will not tolerate any detriment, bullying, harassment or victimisation of any individual who raises a concern in good faith under this policy. This protection applies regardless of whether the concern is subsequently upheld.

Workers who raise genuine concerns will be protected even if they turn out to be mistaken. The following acts of retaliation are expressly prohibited:

- Dismissal, demotion or disadvantage in any employment-related decision
- Exclusion from rota, activities or opportunities
- Threats, bullying or intimidation
- Breach of confidentiality as an act of retaliation
- Any other detrimental treatment connected to the disclosure

Under the Public Interest Disclosure Act 1998 (PIDA), workers who make qualifying disclosures in the public interest are protected by law. Anyone who suffers detriment as a result of making a protected disclosure may be able to bring a claim to an Employment Tribunal.

7. Investigation Procedure

All concerns raised under this policy will be taken seriously and investigated promptly and thoroughly. The investigation will be led by a senior member of PURE JOY ADVENTURES's leadership team, or an independent investigator where appropriate.

7.1 Steps in the Process

Acknowledgement: The concern will be acknowledged within 5 working days of receipt.

Initial Assessment: The DSL or a Director will assess the concern and determine the appropriate course of action, including whether immediate safeguarding action is required.

Investigation: A proportionate investigation will be conducted. Where the concern relates to the safety of a participant, safeguarding procedures will be triggered immediately and may run alongside this process.

Outcome: The person who raised the concern will be kept informed of progress where possible and notified of the outcome, subject to confidentiality and legal constraints.

Action: Where wrongdoing is identified, appropriate action will be taken, which may include disciplinary proceedings, referral to statutory agencies or notification to regulators.

Where a concern relates to an imminent risk of harm to a child, young person or vulnerable adult, the DSL will immediately follow PURE JOY ADVENTURES's Safeguarding Policy and refer to the relevant local authority children's or adult social care services.

8. False or Malicious Allegations

This policy is intended for concerns raised honestly and in good faith. If an individual makes a disclosure knowing it to be false or with the deliberate intent to harm another person, this will be treated as a serious disciplinary matter and may result in disciplinary action, up to and including dismissal.

Good faith means you honestly believe your concern to be true at the time of raising it, even if the investigation does not substantiate it.

9. Relationship to Other Policies

This policy should be read alongside the following PURE JOY ADVENTURES policies:

- Safeguarding and Child Protection Policy
- Adults at Risk / Vulnerable Adults Policy
- Disciplinary and Grievance Procedures
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- Data Protection and GDPR Policy
- Code of Conduct for Staff and Volunteers

Where a concern relates to child protection or the safety of a vulnerable adult, the Safeguarding Policy will take precedence and may require mandatory referral to statutory agencies regardless of the wishes of the person raising the concern.

10. Training and Awareness

PURE JOY ADVENTURES will ensure that all staff, volunteers and contractors are aware of this policy and understand how to use it. Whistleblowing awareness will be included in induction training for all new workers on the Short Break Respite Scheme and refreshed at regular intervals.

The DSL will promote a culture of openness and psychological safety in which workers feel confident to raise concerns without fear, in the knowledge that their welfare and that of scheme participants is the organisation's highest priority.

11. Monitoring and Review

This policy will be reviewed annually by the Trustees of PURE JOY ADVENTURES, or sooner if there is a change in legislation, regulatory guidance or organisational structure. A record of concerns raised and their outcomes (anonymised) will be maintained to support continuous improvement of our safeguarding and governance arrangements.

12. Policy Sign-Off and Review Record

Approved by: Trustees of PURE JOY ADVENTURES

Signature:

Print Name:

Date:

Next Review Date: May 2026

Version History

Version Date Author Summary of Changes

1st Edition May 2025 PURE JOY ADVENTURES Policy created for Short Break Respite Scheme