# Whistleblowing (Speaking Up) Policy

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| **Organisation** | **Bugle Library of Things CIC (BLoT) · Company no. 12846276** |
| **Policy owner** | Board of Directors |
| **Operational lead** | Harry Deacon — lead reporting contact; harry@blotcic.org |
| **Independent reporting director** | Tracie — tracie@blotcic.org (private inbox confirmed) |
| **Approval date** | 03/11/2026 |
| **Minute reference** | R10-03-11-26 |
| **Effective date** | 04/11/2026 |
| **Next scheduled review** | 12 months after approval; earlier if law or risk changes |

## 1. Purpose and commitment

BLoT encourages people to speak up promptly about serious wrongdoing or risks affecting the organisation, the communities it serves, public funds, colleagues or the wider public. We will listen, act fairly, investigate proportionately, protect confidentiality as far as reasonably possible, and not tolerate retaliation for raising a genuine concern.

This policy explains how to raise public-interest concerns and how they are handled. It operates alongside safeguarding, complaints, grievance, disciplinary, financial controls, fraud prevention, conflicts of interest and data protection arrangements. No one must delay urgent protective action to use this policy.

## 2. Who may use this policy and legal protection

This policy is open to BLoT employees, workers, agency or temporary personnel, apprentices, contractors, volunteers and directors, as well as former personnel who have information about wrongdoing. We will take concerns raised by any of these groups seriously.

Statutory whistleblowing protections under the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998 and later legislation) depend on the individual's legal status and whether the disclosure meets the legal tests. Volunteers without a qualifying worker relationship and non-executive directors are not usually covered merely by virtue of those roles. BLoT nevertheless prohibits retaliation against anyone who raises concerns in good faith or on reasonable grounds under this policy, insofar as within its control.

## 3. What may amount to whistleblowing

A qualifying disclosure generally involves information that the person reasonably believes tends to show wrongdoing, is in the public interest and is disclosed through an appropriate channel. Concerns may relate to past, present or likely future events.

- Criminal offences, fraud, theft, bribery, corruption, false accounting, misuse of grants, donations or lottery funds.
- Failure to comply with a legal obligation, regulatory requirement or significant governance duty.
- Danger to health or safety; neglect or abuse of children or adults at risk; serious unsafe outreach practices.
- Environmental damage, deliberate concealment of wrongdoing or serious mishandling of confidential personal information.

- Sexual harassment, where the legal criteria for a qualifying protected disclosure are met.
- Other serious misconduct affecting BLoT's beneficiaries, staff, volunteers, public trust or resources.

## 4. Whistleblowing, personal grievances and safeguarding

Personal employment issues affecting only the person raising them (for example, their own working hours or individual workplace dispute) will generally be considered under BLoT's grievance or other appropriate procedure, unless the matter also satisfies the public-interest disclosure test. A disclosure may involve both a personal grievance and a public-interest concern; it will not be rejected solely because the person also has a personal interest.

Immediate safeguarding risks must be reported under SG-PRO-01 and related safeguarding procedures; contact emergency services on 999 where someone is in immediate danger. For safeguarding, Jo Rusbridge is Designated Safeguarding Lead and Harry Deacon is Deputy DSL, with independent escalation where either is implicated. This policy is not a substitute for mandatory or urgent external referrals.

## 5. How and to whom to raise a concern

A person may raise a concern verbally or in writing. A written account is helpful but not required. No special form or proof is necessary before speaking up. Where possible, provide what happened, when and where, people involved, why it is concerning, supporting documents lawfully held, and any immediate risks.

| Situation | Reporting route |
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| **All whistleblowing concerns, unless Harry is conflicted** | Contact Harry Deacon, primary reporting contact: harry@blotcic.org. Concerns may be raised verbally or in writing. Do not send the disclosure to Harry if he is implicated or cannot reasonably handle it independently. |
| **Harry is implicated or otherwise conflicted** | Contact Tracie, independent Board Director: tracie@blotcic.org. Tracie takes responsibility for arranging independent handling; do not copy Harry. |
| **Both Harry and Tracie are implicated or otherwise conflicted** | Contact Bill Davies, designated alternate reporting director: bill@blotcic.org. Do not copy Harry or Tracie. If Bill is also conflicted or unavailable, refer the concern to another non-conflicted director or an independent investigator. |
| **Immediate safeguarding risk or danger** | Follow SG-PRO-01 and contact 999 where there is immediate danger. Do not delay urgent protective action while making a whistleblowing disclosure. |

If the recipient has an actual or apparent conflict of interest, they must not investigate or control the case. The concern is reassigned to a suitable independent director or independent investigator. The Board will secure independence without disclosing information to an implicated person unnecessarily.

## 6. Confidentiality and anonymous disclosures

BLoT will protect a reporting person's identity as far as reasonably practicable and share it only on a strict need-to-know basis. Absolute secrecy cannot be guaranteed: disclosure may be necessary to investigate fairly, protect others or comply with law. Where practicable, the person will be consulted before their identity is disclosed.

Anonymous disclosures are accepted and assessed on their merits. Anonymity can make follow-up or feedback harder, but is not a reason to disregard credible information. Do not make recordings, access files or obtain evidence unlawfully to support a concern.

## 7. How BLoT will respond

The person receiving the disclosure will assess immediate safety and safeguarding risks, arrange secure recording and identify a non-conflicted case lead. BLoT aims to acknowledge a concern within five working days where contact details are provided, complete initial triage within ten working days, and provide a substantive update or outcome within 20 working days where practicable. If more time is needed, the case lead will explain the reason and give a further update date. These are organisational targets, not statutory deadlines.

- Assess whether the issue falls under whistleblowing, safeguarding, grievance, complaints, fraud, data breach or another procedure; apply overlapping processes as needed.
- Preserve relevant evidence and manage access, safeguarding, reporting duties and conflicts of interest.
- Appoint an impartial person to investigate; obtain external expertise where seriousness, independence or complexity warrants it.
- Give people named in allegations a fair opportunity to respond at an appropriate stage, while avoiding interference with safeguarding or regulatory investigations.
- Record findings, remedial actions, referrals, responsible owners and completion dates; consider learning and preventative changes.
- Provide proportionate feedback to the whistleblower, without breaching privacy or disclosing confidential disciplinary information.

The Board receives an anonymised summary of relevant cases, themes, serious risks and corrective actions, normally quarterly, or immediately where the seriousness requires. Implicated directors must not take part in the relevant case decisions.

At closure, the case lead must record whether allegations were substantiated, partly substantiated, not substantiated or inconclusive; actions agreed, owners and completion dates; any statutory, contractual, funder or insurer notifications considered or made; and whether the concern was referred elsewhere. A non-conflicted director must check completion of significant remedial actions. The whistleblower receives an appropriate closure explanation without confidential personnel or safeguarding details.

## 8. Protection from retaliation and support

BLoT prohibits dismissal, threatened loss of work, reduced hours, bullying, intimidation, harassment, withdrawal of volunteer opportunities or other retaliation because someone raised a concern under this policy. Legally protected workers have statutory rights where their disclosure qualifies. Any allegation of retaliation will be considered independently and may lead to disciplinary or other appropriate action.

Individuals may seek confidential advice from a trade union representative, Acas, an independent legal adviser or Protect, the whistleblowing charity. BLoT will consider adjustments or other reasonable support needed to enable a person to raise a concern safely.

A concern that turns out to be mistaken does not in itself justify disciplinary action. Deliberately fabricated allegations or knowingly false evidence may be managed under the appropriate disciplinary or conduct process, without undermining protection for genuine disclosures.

Within 30 calendar days after case closure, where contact is possible and safe, the case lead will make a confidential follow-up enquiry about any retaliation, intimidation or adverse treatment since the disclosure. Any reported retaliation will be separately assessed, protected against and investigated by a non-conflicted person; the follow-up date, outcome and actions are entered in the restricted register. Additional check-ins may be arranged where risks are ongoing.

## 9. External disclosures

A person does not always have to report internally first. Depending on the subject and legal conditions, a disclosure may be made to an appropriate “prescribed person” or another legally permitted recipient. The criteria for protection are different for different disclosure routes, especially wider disclosures to the media or public.

The current Government list of prescribed persons is available at https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2 . The correct recipient depends on the subject matter; examples may include the Information Commissioner for data protection, the Health and Safety Executive for workplace safety, HMRC for tax, the police for suspected crime, and an appropriate body responsible for a relevant regulatory issue. Not every regulator is prescribed for every concern. Independent advice should be obtained where uncertain.

Nothing in this policy prevents legally protected disclosures, lawful reporting to regulators or police, seeking legal advice or complying with a legal duty. Confidentiality agreements cannot lawfully prevent protected whistleblowing disclosures.

The case lead will make and record an early notification assessment for relevant statutory safeguarding services, police, ICO, HSE, HMRC, Companies House/CIC Regulator (where relevant), funders, commissioners and insurers. Notification must be based on actual legal, contractual, regulatory or policy obligations; BLoT must not assume Charity Commission reporting rules apply merely because it is a CIC. Urgent referral must not await the end of an internal investigation.

## 10. Records, privacy and reporting

Reports and the whistleblowing case register will be held in a separately permissioned, restricted Microsoft 365 location, apart from general complaints and personnel records. Access is limited to Harry as case lead or, where conflicted, Tracie, Bill or another expressly appointed non-conflicted investigator. No implicated person may have access to the relevant case record. BLoT will apply D01 Privacy Notice, D02 Retention and Disposal Schedule, D03 Appropriate Policy Document and D05 Sensitive Information DPIA where relevant.

Records will contain factual concerns, decisions, risk assessments, relevant communications, investigation findings, referrals, corrective actions, closure authorisation and follow-up checks. Allegations must be distinguished from established findings. The case lead will record a retention category and review/disposal date under D02, with any safeguarding, investigation, employment or litigation hold documented; no blanket whistleblowing retention period is assumed.

Minimum restricted register fields: unique reference; received date and channel; reporter contact preference (if known); alleged wrongdoing category; conflicts and case lead; safeguarding/immediate-risk action; acknowledgements and update dates; investigation decision; referrals/notifications; outcome and evidence reference; remedial actions and owner; closure authorisation/date; 30-day retaliation follow-up; retention and disposal review date. Use a separate access-controlled case folder for evidence and names, minimising identifiers in Board summaries.

## 11. Accountability, implementation and review

The Board owns this policy, monitors the effectiveness of reporting arrangements and ensures independent handling of concerns about the lead, senior management or directors. Harry is responsible for policy awareness, induction, register oversight and routine handling, except where conflicted. The Board will nominate a non-conflicted director to ensure continuity if Harry is implicated. Staff and volunteers must know the direct Tracie route without going through Harry.

The Board will formally review this policy at least once every twelve months, and sooner following a significant legislative change, serious incident or material governance change. Amendments require formal approval and recorded Board minutes.

## 12. Related BLoT documents and external guidance

- SG-CYP-01 Safeguarding Children and Young People; SG-AD-01 Safeguarding Adults; SG-PRO-01 Safeguarding Procedures and Reporting; SG-ALG-01 Allegations and Positions of Trust.
- Q01 Complaints Policy; employee grievance and disciplinary procedures where adopted; Conflicts Framework; Risk Management Framework.
- D01 Privacy Notice; D02 Data Retention and Disposal Schedule; D03 Appropriate Policy Document; D04 Processing Register; D05 Sensitive Information DPIA.
- Acas whistleblowing guidance: https://www.acas.org.uk/whistleblowing-at-work/having-a-whistleblowing-policy
- GOV.UK whistleblowing guidance for workers (updated October 2026): https://www.gov.uk/guidance/whistleblowing-guidance-for-workers

Implementation: Harry Deacon is the primary reporting contact (harry@blotcic.org). Tracie (tracie@blotcic.org) is the independent alternative when Harry is conflicted. Bill Davies (bill@blotcic.org) is the confirmed alternate when both Harry and Tracie are conflicted. These reporting channels must remain confidential and accessible only to the relevant, non-conflicted recipient.