

Whistleblowing Policy

Pocket Money Adventures CIC | Version 1.2

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Current operating requirements

Protected disclosure and independent route

No approval is needed to make a lawful protected disclosure or safeguarding referral. A concern about Nathan must be routed to an uninvolved director or appropriate prescribed/external body. Do not treat directors, contractors or volunteers as automatically having every statutory employee protection; PMA's no-retaliation commitment applies to all. Check current prescribed-person guidance for the subject matter.

Detailed policy and procedures

Whistleblowing Policy

Registered office: 68 Nottingham Road, Eastwood, Nottingham, NG16 3NQ Company No. 16994988 • ICO Registration No. ZC124930 General contact: hello@pocketmoneyadventures.co.uk Safeguarding contact: safeguarding@pocketmoneyadventures.co.uk Designated Safeguarding Lead: Nathan Waldron Deputy DSL: Bernadette Houlton

Pocket Money Adventures CIC is committed to the highest standards of openness, probity, and accountability. Staff, contractors, volunteers, directors, and anyone working on PMA's behalf are often the first to notice when something is wrong. This policy sets out how they can raise a concern in confidence and be protected from detriment for doing so.

This policy is not about personal grievances. Those go through the Grievance Policy. This policy is about concerns in the public interest: wrongdoing that could affect children, parents, partner schools, sponsors, funders, or the integrity of the charitable mission.

Purpose:

To give every person working with or for PMA a safe and trusted route to raise a concern in the public interest, and to protect that person from retaliation for doing so. To meet PMA's obligations under the Public Interest Disclosure Act 1998 (PIDA) and the Employment Rights Act 1996 s.47B, and to satisfy the Bribery Act 2010 s.7 requirement for adequate procedures.

What counts as a whistleblowing concern:

A concern qualifies under this policy if the person raising it reasonably believes the information tends to show one or more of the following:

- A criminal offence, including fraud, bribery, theft, or money laundering
- A failure to comply with a legal obligation, including safeguarding, data protection, employment, or charity law
- A miscarriage of justice
- A risk to the health or safety of any person, including children in partner schools
- Damage to the environment
- Deliberate concealment of any of the above The concern can be about something that has happened, is happening, or is likely to happen. You do not need proof. You need a reasonable belief, held in good faith.

Protection for the person raising the concern:

PIDA 1998 protects workers who make a qualifying disclosure in the ways set out below. PMA will not subject you to any detriment, dismissal, or disciplinary action for raising a concern in good faith under this policy. That protection extends to contractors, volunteers, and agency staff as a matter of PMA policy, even where the statutory definition is narrower.

Retaliation against anyone who raises a concern is itself a disciplinary offence and will be treated as gross misconduct.

You may remain anonymous, but investigations are easier and protection is stronger when the source is known. Confidentiality is preserved wherever the law allows.

How to raise a concern - internal route (primary):

The intake email is monitored by the Director (any) and the Deputy DSL as independent reviewers:

whistleblowing@pocketmoneyadventures.co.uk

Acknowledgement within 3 working days. An initial response setting out next steps within 10 working days. A written outcome within 28 working days, or a progress update if investigation requires longer.

How to raise a concern - internal route (if the concern is about a Director):

If the concern is about the Director (Nathan Waldron), send it to the Deputy DSL (Bernadette Houlton) directly. If the concern is about both, use the external route below.

How to raise a concern - external route:

PIDA protects disclosures to prescribed persons. For PMA's operating context, the relevant ones are:

- Charity Commission and Regulator of Community Interest Companies (governance, fraud, financial impropriety)
- ICO for data protection breaches - ico.org.uk - 0303 123 1113
- HMRC for tax or VAT fraud
- The police for criminal offences
- NSPCC whistleblowing advice line for safeguarding concerns in education - 0800

028 0285

- LADO for allegations about a person in a position of trust working with children - see local LADO routes in the Operational Reference Hub You can go external directly, without going internal first, if you reasonably believe you will suffer detriment or that the evidence will be concealed.

What PMA will do with your concern:

1. Acknowledge receipt within 3 working days.

2. Assess whether the concern falls under this policy, the Safeguarding Policy, the Grievance Policy, or none of them.

3. Appoint an independent investigator - a Director not involved in the concern, or an external party if the matter requires it.

4. Protect the identity of the source unless disclosure is required by law or by operational necessity and the source has been consulted.

5. Produce a written outcome with findings, actions, and referrals.

6. Feed the outcome into the Activity Log and the Legal Audit Weekly Log as a controlled record.

Record-keeping:

Every concern received at the intake email is logged in the Whistleblowing Register (stored in the password-protected Legal + Compliance area). The register records date received, acknowledged, outcome date, and classification, without identifying the source in the general record.

Linked policies and references:

- Children and Adult Safeguarding Policy v1.7
- Grievance Policy v1.1
- Anti-Bribery and Gifts Policy v1.1
- Anti-Money Laundering Policy v1.1
- Disciplinary Policy v1.1
- Operational Reference Hub - Whistleblowing intake channel (OPREF row)

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.