

# HARLEQUIN FARM STABLES

## RIDING SCHOOL & LIVERY



## Whistle Blowing Policy

### POLICY STATEMENT

The Employment Rights Act 1996 as amended by The Public Interest Disclosure Act 1998 and Enterprise and Regulatory Reform Act 2013 protects employees against detriment or dismissal for raising concerns about potential breaches of the law or other wrongdoing where these are matters of public interest (“Whistleblowing”).

The Act and this policy apply to all that represent Harlequin Farm Stables (including agency workers, temporary employees and contractors).

Although not subject to the legislation described above, the Organisation will apply the same considerations and offer the same protections and assurances to its Trustees, Volunteers, Instructors, workforce and work colleagues within the BHS to include BHS Assessors, BHS Internal Quality Assurers, BHS Approved assessment centres (and their workforce), BHS Accredited Professional Coaches and learners/candidates of BHS/BHSQ assessments and qualifications who raise concerns under this policy.

### PURPOSE

The Organisation is committed to the highest standards of integrity and honesty in conducting its business and to this end encourages all individuals described above in the policy statement, to raise genuine concerns about breaches of the law and other potential wrongdoings (‘qualifying disclosures’) without fear of repercussions.

### QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as ‘qualifying disclosures’. A qualifying disclosure means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the organisation has committed a “relevant failure” by:

committing a criminal offence

failing to comply with a legal obligation

a miscarriage of justice

endangering the health and safety of an individual environmental damage or

concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The organisation will take any concerns that you may raise relating to the above matters very seriously.

Individuals must reasonably believe that the disclosure is “in the public interest”. We encourage you to use the procedure to raise any such concerns.

Disclosures may also be made for investigation through this procedure where individuals are concerned about a reputational risk to the organisation.

The disclosures will be treated in the same manner as those defined as qualifying disclosures.

### MAKING A DISCLOSURE

A disclosure can be made to one of the following Designated Persons:

Information which an individual to which this policy relates to, as described in the policy statement, reasonably believes is a qualifying disclosure as defined by this policy and should be

disclosed promptly to the Organisation's Proprietor and lead Safeguarding officer Carley Gammon or Ian Gammon deputy safeguarding officer. However if the disclosure relates to either person named, the disclosure can be disclosed promptly to the relevant individuals within The British Horse Society (BHS); BHS Director, or if the disclosure relates to their BHS Director a Home Team member can raise the matter with the Chief Executive or Company Secretary.

If the disclosure relates to the Chief Executive or the Company Secretary, it can be raised with the Chair of the Board of Trustees.

In respect of all disclosures, except those covered above; Carley Gammon, Ian Gammon, BHS Chief Executive or Company Secretary you may choose to report these to harlequinfarmstables@btinternet.com alternatively to the BHS at concerns@bhs.org.uk or to the Company Secretary directly.

## CONFIDENTIALITY

The Organisation hopes that all individuals will feel comfortable making disclosures without the need for anonymity. If a disclosure is made anonymously, the organisation will be unable to notify the person making the disclosure of the outcome, and it may also hinder our ability to carry out a thorough investigation.

Anonymous disclosures will be considered, but if there is insufficient evidence to warrant investigation or the allegation is deemed not to be credible, or trivial, or vexatious then no further action will be taken.

If the individual making the disclosure wishes to keep their identity confidential the Society will endeavour to respect the request and will notify the person if this will not be possible (for example because disclosure would be required by law, or to assist the police or a regulator with an investigation, or occasionally where the nature of the disclosure in itself would identify them). In addition, it may be necessary to disclose the individual's identity to:

- The decision maker who will determine whether an investigation is required (see paragraph 6)
- An 'Investigator' appointed by the Society

## INVESTIGATION PROCEDURE

Where possible the disclosure should be made in writing with any supporting evidence. The organisation will acknowledge receipt in writing, normally within 5 working days.

The organisation will then determine if further investigation is required. In making this decision consideration will be given to the following:

- Whether the disclosure concerns a relevant failure as defined in qualifying disclosures.
- Whether the procedure in this policy has been followed.
- Whether the individual is acting in the public interest and not for personal gain or personal motives.

It may be necessary for the person making the disclosure to be interviewed to secure information to decide whether a disclosure should be investigated. In this situation the person making the disclosure may be accompanied by a trade union representative, work colleague or other suitable companion at the interview.

The decision on whether to investigate a disclosure shall be made by (the Decision Maker within the BHS or The organisations named persons):

Carley Gammon- Harlequin Farm Stables Proprietor/ Lead Safeguarding Officer and Ian Gammon Harlequin Farm Stables Deputy Safeguarding Officer, except where the disclosure concerns either person.

The BHS Company Secretary, except where the disclosure concerns the Company Secretary or Chief Executive. The Chief Executive where the disclosure concerns the Company Secretary.

The Chair of the Board of Trustees where the disclosure concerns the Chief Executive.

If the Organisation and/or Society decides that there are no grounds to answer, the person making the disclosure will be informed as soon as practicable. If an investigation is warranted, the Decision Maker will determine the nature of any investigation and who should undertake that investigation. This person should have no personal interest in the case and there should be no expectation of bias from the outcome. The Decision Maker shall only disclose details of the subject matter of the investigation to other employees of the Organisation or Society to the extent that it is necessary for:

- (i) The purpose of the investigation.
- (ii) For the effective management of the Organisation/Society.

Any investigation will be carried out as swiftly as necessary, considering the complexity of the issues and the volume of evidence to be considered.

When the investigation has taken place, the Decision Maker will decide what, if any, further action is required. This may include reporting to bodies outside of the Organisation/Society. The person making the disclosure will be kept informed of the outcome of the investigation and any action taken by the Organisation/ Society as a result.

#### INDIVIDUALS NAMED IN A DISCLOSURE

When an allegation is made against a named individual, they will be informed of the allegation and the supporting evidence at an appropriate time. The point at which this occurs will depend on the specific nature of the disclosure. Should they be interviewed about the matter, they may be accompanied by a trade union representative, work colleague or other suitable companion.

#### PROTECTION FOR WHISTLEBLOWERS

The Organisation will not take any disciplinary action against a person making a disclosure providing they do not make false allegations maliciously or with a view to personal gain.

The Organisation will take all reasonable steps to ensure that a person making a disclosure is not subject to any detrimental treatment (including informal pressure, or any form of victimisation) for making a disclosure in accordance with this policy.

The Organisation will take disciplinary action against Home Team members who seek to bully, intimidate or victimise anybody because they have made a Disclosure under this policy.

#### DISCLOSURE TO EXTERNAL BODIES

This policy has been implemented to allow individuals to make a disclosure within the Organisation . An individual may have the right to make a disclosure outside of the Organisation in certain circumstances. However, the Organisation strongly encourages all people to seek advice before reporting a concern to any third party whether there is any supporting information to corroborate the suspected relevant failure.

The independent whistleblowing charity Public Concern at Work, operates a confidential hotline and can be contacted at:

The Green House

244-254 Cambridge Heath Road

London E2 9DA

Website: [www.protect-advice.org.uk](http://www.protect-advice.org.uk) Whistleblowing Advice Line: 020 3117 2520

If your disclosure relates to a regulated qualification delivered by the BHS and awarded by BHSQ, the individual may wish to report the matter to BHSQ who can be contacted at:

Website: [www.bhsq.co.uk](http://www.bhsq.co.uk) Telephone: 02476 840544

BHSQ is recognised and regulated by the Office of the Qualifications and Examinations Regulator (Ofqual) in England, SQA Accreditation in Scotland, Qualifications Wales (QW) and the Council for the Curriculum, Examinations and Assessment (CCEA) in Northern Ireland.

An individual should seek advice if they wish to report their concern to the relevant regulator.

Individuals are reminded that any disclosure of information about the Organisation/Society to a third party must not breach the duties of confidentiality owed by them to the Organisation/Society.

#### RECORDING AND REPORTING

The Organisation will keep a record of all disclosures made under this policy.

The records of complaints and their investigation will be kept by the Organisation for five years.

Complaints that may affect the security of qualifications awarded by BHSQ will be shared with BHSQ for external quality assurance purposes.

The procedure will be subject to review by Harlequin Farm Stables three years.

#### TO REPORT A MATTER

To report a matter under this policy, you can contact any of the Designated Persons referred to in this Policy, or send an email to

[harlequinfarmstables@btinternet.com](mailto:harlequinfarmstables@btinternet.com) or [concerns@bhs.org.uk](mailto:concerns@bhs.org.uk) .

Please provide the following information:

Key details such as the nature of the suspected or actual wrongdoing, location/s, date/s, party or parties involved

Any supporting files, documents and/or photographs

Your relationship to the Organisation/ BHS

Your name and contact details

Please also inform us if you are under 18 years old, so that we can ensure that you have age appropriate support and guidance.

Examples of disclosures that might be made in the context of The Organisation or BHS education and assessment delivery may include the following:

-An individual identifying that an employee, assessor or Approved assessment centre has breached confidentiality relating to personal information or assessment details

-An individual informs the Organisation/ BHS of an employee, assessor or Approved assessment centre committing or attempting to commit activity which may affect the integrity of an assessment

-An individual witnesses an employee or assessor acting in a way that compromises health and safety during an assessment

-An individual identifying practices or processes, or lack of, at an Approved Assessment Centre that compromises health and safety during an assessment

-An individual or organisation identifies a potential conflict of interest for a stakeholder that has not been declared to the BHS

-An individual witnesses a BHS assessor or member of an advisory group falsifying expense claims. This list is for example only and is not exhaustive.

Whistle Blowing Policy- Harlequin Farm Stables last reviewed 12/01/2024

---

07885 897261 . [WWW.HARLEQUINFARMSTABLES.CO.UK](http://WWW.HARLEQUINFARMSTABLES.CO.UK)

HARLEQUIN FARM STABLES, MILDENHALL DROVE KENNY HILL, SUFFOLK, IP28 8DS