

Whistleblowing / Speaking Up Policy

Speak Up. Protect People. Investigate Fairly.

Right First Time UK Ltd | Company No. 17493370 | Updated: 13 October 2026

Reporting: Contact Us at <https://rightfirsttimeuk.com/contact-us.php> or complaints@rightfirsttimeuk.com.

Immediate danger: call 999.

Key protection: RFTUK's no-retaliation commitment includes people without statutory worker status. It does not itself confer employment tribunal rights.

1. Purpose and commitment

Right First Time UK (RFTUK) encourages people to speak up early about suspected wrongdoing, danger, illegality, serious misconduct or concealment. A genuine concern is not disloyalty, including when it concerns a Founder, Director or another senior person.

RFTUK will receive concerns seriously, protect people where reasonably possible, assess the evidence fairly, and seek appropriate corrective action. Nobody must prove an allegation before making a reasonable report.

2. Who this policy covers

This internal policy is available to Directors, Founders, Campaign Leaders, Campaigners, employees, workers, contractors, Volunteers, Public Members and supporters. It also guides RFTUK when external sources raise concerns about an organisation or service that RFTUK examines.

Public-interest whistleblowing under employment law is different from RFTUK's wider internal Speaking Up scheme. Accepting a report under this policy does not itself make a disclosure legally protected.

3. Legal whistleblowing rights versus internal protections

Under the Employment Rights Act 1996, as amended, workers in Great Britain may be protected against detriment for a protected disclosure, and qualifying employees may have automatic unfair-dismissal protection. Eligibility depends on the person's actual legal status, the disclosure, its public-interest basis and the recipient. Employment law in Northern Ireland is separate.

Genuine unpaid Volunteers, non-worker Directors, Public Members and supporters do not automatically gain statutory worker rights. Regardless of their legal status, RFTUK's own rules prohibit retaliation for making a genuine concern through an appropriate route. That commitment does not itself create an employment contract or tribunal rights.

Since 6 April 2026 in Great Britain, sexual harassment is expressly a qualifying whistleblowing disclosure category, subject to the statutory tests. Concerns may also engage equality, safeguarding, complaint or employment procedures.

4. What can be reported

Statutory qualifying matters can include a criminal offence, breach of a legal obligation, miscarriage of justice, danger to health or safety, environmental damage, sexual harassment, and deliberate concealment of information about such wrongdoing.

RFTUK also accepts serious internal concerns about safeguarding, fraud, false invoices, donation misuse, bribery, bullying or discrimination, cybersecurity, deliberate data breaches, governance or unethical conduct, even when the precise statutory disclosure category is uncertain.

5. Public interest, personal grievances and good-faith errors

For statutory protection, the person must reasonably believe the information tends to show qualifying wrongdoing and that disclosure is in the public interest. A purely personal disagreement will not normally meet that test. An issue can have both personal and public-interest elements; RFTUK will not dismiss the latter merely because a grievance is also involved.

The person should separate direct knowledge, observation, documents and reasonable suspicion. A concern later found mistaken or unsubstantiated is not automatically dishonest. Knowingly fabricated evidence or deliberately malicious allegations may be addressed fairly under conduct policies, without intimidating those who report in good faith.

6. How to raise an internal concern

Use the RFTUK Contact Us page at <https://rightfirsttimeuk.com/contact-us.php> or write to complaints@rightfirsttimeuk.com, marking the matter “Confidential — Speaking Up”. The email is an organisational reporting route; do not assume ordinary email is end-to-end encrypted or that it is read by only one person.

Where appropriate, a report may be made to an unconflicted Director or the responsible governance, safeguarding, finance or security lead. If the subject is the usual recipient, ask that the concern be referred to another authorised unconflicted person. Urgent external or statutory reporting remains available where appropriate.

7. What information to provide

Where it is safe and reasonably available, explain what happened or may happen; who or what is at risk; relevant dates and places; what was personally observed; relevant documents; any immediate danger; and whether confidentiality is requested.

Do not delay a report to collect perfect evidence. RFTUK should take responsibility for assessing and investigating the concern rather than telling the reporting person to undertake a private investigation.

8. Concerns about senior people and conflicts

A Founder, Director, Campaign Leader or other senior person who is implicated must not be the sole investigator or final decision-maker. RFTUK should arrange independent review by another unconflicted authorised person or an external adviser when necessary, consistent with applicable law and its registered Articles of Association.

People handling reports must disclose conflicts arising from personal involvement, close relationships or financial interests. Seniority is not immunity; equally, making an allegation does not establish guilt.

9. Urgent danger and safeguarding

If someone is in immediate danger, call 999 or the relevant emergency service. Safeguarding concerns should go promptly to the appropriate safeguarding body under RFTUK’s Safeguarding Policy; do not wait for an internal investigation. Active cyber incidents, theft, fraud or serious financial threats may require immediate technical, banking, police or regulatory action.

Protect safety first, then preserve evidence so far as lawful and practical. Never promise that RFTUK can provide an emergency response through forms, email or social media.

10. Anonymous and confidential reports

RFTUK will consider anonymous reports on their merits; anonymity may limit verification, follow-up and feedback. A person who identifies themselves may ask RFTUK to limit disclosure of their identity, and access should be confined to those who genuinely need to know.

Absolute secrecy cannot be guaranteed: identity or information may need disclosure for safeguarding, a court or legal obligation, police enquiries, fair process or another overriding requirement. Where lawful and practicable, the reporter should be informed before identity is disclosed.

11. Protection against retaliation

RFTUK prohibits threats, intimidation, bullying, unfair exclusion, unjustified restriction of legitimate opportunities, harassment, blacklisting or other disadvantage because a person raised a genuine concern through an appropriate channel.

Proportionate temporary changes to duties or access may be justified to protect evidence, people or systems during an investigation; these must not be disguised punishment. Any allegation of retaliation must itself be assessed independently. Where statutory worker protection applies, legal remedies and short tribunal time limits may also exist.

12. Acknowledgement and triage

RFTUK should acknowledge reports as soon as reasonably practicable, identify immediate risks, record essential facts, assess confidentiality, and decide who may investigate. Urgent issues must be escalated without waiting for routine timetables.

The report may require more than one route: whistleblowing, ordinary complaint, fraud, bribery, safeguarding, data protection, cyber incident, equality or grievance. Internal timetables do not override legal reporting deadlines or necessary external referrals.

13. Fair and independent investigation

Credible reports should be examined proportionately by someone sufficiently competent and independent. Evidence may include correspondence, records, financial documents, audit logs, interviews and independent professional advice. Investigators must keep allegation, evidence, findings and decisions distinct.

People accused should be treated fairly, their privacy respected, and, where appropriate, given a chance to respond before adverse findings are made, subject to safeguarding and evidence-preservation needs. Reports must not be decided solely by a person accused or materially conflicted.

14. Feedback, outcomes and corrective action

RFTUK will give reasonable progress information where practicable and explain, so far as confidentiality and law permit, whether the concern was reviewed, referred or resulted in appropriate action. Reporters are not automatically entitled to another person's private employment or disciplinary details.

Actions may include fixing a control weakness, restricting access, recovering funds, referring to an authority, securing data, amending training or policy, or fairly dealing with misconduct. An unsubstantiated concern does not automatically justify action against the person who reported it.

15. Evidence preservation and safe handling

Preserve relevant emails, documents, meeting records, messages, audit logs and financial records where a serious issue arises. Nobody may knowingly alter, delete, conceal or fabricate evidence to frustrate an investigation. A legal hold may be required if litigation, regulatory action or criminal proceedings are reasonably anticipated.

Whistleblowing is not permission to hack accounts, bypass security, obtain unrelated personal information, breach privilege or commit a criminal offence. Collect only what is lawfully available and reasonably necessary; protect it securely.

16. Fraud, bribery, cyber incidents and privacy

Suspected theft, fabricated invoices, false expenses, misuse of restricted donations, secret commissions or corrupt supplier inducements should be routed under the relevant Financial Controls, Procurement, Gifts & Anti-Bribery and governance procedures, with urgent steps to prevent further loss.

Concealed breaches, misuse of credentials, unauthorized access and unsafe handling of personal or safeguarding information also require rapid containment and data-breach assessment. Statutory notification requirements are assessed separately from this speaking-up process.

17. External disclosures and prescribed persons

Workers may in certain circumstances make legally protected disclosures to the appropriate prescribed person or regulator. The correct body, subject remit and statutory conditions matter. The Government's published prescribed-person list was updated on 15 September 2026 and should be checked before relying on it.

A disclosure to a legal adviser when obtaining advice may have particular legal protection. Appropriate independent sources include Acas, a solicitor, a trade union and the charity Protect. RFTUK will not discourage lawful independent advice or necessary reports to police, safeguarding services or regulators.

18. Public disclosure and media risks

Posting a concern publicly, speaking to journalists or publishing documents online carries higher risks and will often not qualify for statutory whistleblowing protection. Seek independent advice before sharing material that may be privileged, confidential, court-restricted or personal.

RFTUK's Media & Press and Evidence/Publication policies govern any proposed public use of external-source material. RFTUK is not a statutory prescribed disclosure body merely because it campaigns for accountability.

19. External whistleblowers contacting RFTUK

RFTUK may receive concerns about government bodies, employers, contractors or other organisations. It should clearly explain that receiving information does not make RFTUK the source's employer, solicitor, prescribed person or statutory investigator.

The source's identity should be protected on a need-to-know basis; evidence should be checked before any publication. A source who may have statutory rights should be encouraged to seek advice about the safest channel and any consequences of sharing information with RFTUK or the media.

20. Confidentiality clauses and legal rights

A non-disclosure agreement or contractual confidentiality term cannot lawfully prevent a qualifying protected whistleblowing disclosure where the statutory conditions are met. Other obligations, including privileges, sensitive-data restrictions and court orders, may still apply.

Nothing in this policy is intended to discourage a lawful protected disclosure, a report of crime, independent legal advice or a safeguarding referral.

21. Complaint about how RFTUK handled a concern

A person may challenge unreasonable delay, retaliation, mishandled confidentiality, conflicts of interest or an unfair investigation process through RFTUK's Complaints Policy. This complaint should be considered separately from the merits of the original report and, where practicable, by an unconflicted reviewer.

Email complaints@rightfirsttimeuk.com or use <https://rightfirsttimeuk.com/contact-us.php>; identify if the complaint concerns the person normally handling that inbox so alternative oversight can be arranged.

22. Records, privacy and governance oversight

Speaking-up files may involve special-category information, criminal allegations, safeguarding details or confidential sources. RFTUK must use restricted access, secure record-keeping, proportionate retention and legal holds under its Privacy Notice, Data Protection and Records Retention policies.

Directors should be informed of significant trends, unresolved hazards and control failures without unnecessarily identifying reporters. No performance target should discourage reporting. Training should cover sensitive intake, fair investigations, urgent referral, avoiding retaliation and the correct external routes.

23. Application to the Parent Contribution Service (PCS)

PCS is an RFTUK service, not a separate company. Internal speaking-up concerns may include false payment or agreement records, improper access to parent or child data, safeguarding failures, retaliation, fraud, or concealment within PCS.

PCS does not receive, hold or forward ordinary child-contribution money between parents and has no CMS or court enforcement powers. The PCS service-access fee is distinct from direct parent-to-parent contributions. PCS concerns must be handled with the same confidentiality and independent review safeguards.

24. Organisational status and authority

Right First Time UK Ltd is a non-profit company limited by guarantee registered in England and Wales, company number 17493370, with incorporation accepted on 3 October 2026. Its public name is Right First Time UK (RFTUK). The registered office shown in the earlier policy is 82A James Carter Road, Mildenhall, IP28 7DE, subject to checking the current Companies House record.

Initial roles may be genuinely voluntary and unpaid, with reimbursement of authorised expenses. Any future remunerated role or payment must be lawfully and properly authorised in line with the company's registered Articles. This policy does not amend or supersede those Articles.

25. Review and related policies

This policy will be reviewed at least annually and earlier where law, worker-status arrangements, external reporting routes or RFTUK's operations materially change. It should be read with the Governance & Transparency, Complaints, Safeguarding, Volunteer, Financial Controls, Gifts & Anti-Bribery, Conflict of Interest, Information Security, Privacy, Records Retention, Media & Press and PCS policies.

The current statutory position should always be checked at the time of a proposed protected disclosure. Where this general policy conflicts with mandatory law or the registered Articles of Association, those higher-ranking requirements prevail.

Official guidance and independent support

- [GOV.UK — Whistleblowing for employees](#)
- [GOV.UK — Guidance for employers](#)
- [GOV.UK — Prescribed persons and bodies \(updated Sep 2026\)](#)
- [Acas — Whistleblowing at work](#)
- [Acas — Sexual harassment whistleblowing protections](#)
- [GOV.UK — Volunteer rights](#)
- [Protect — Independent confidential advice](#)

Registered entity: Right First Time UK Ltd, company limited by guarantee, number 17493370; incorporation accepted 3 October 2026. This policy does not modify the registered Articles of Association.