

Whistleblowing Policy

Last updated: 09:10 08/06/2026



Purpose

ScoutSwap C.I.C. is committed to the highest standards of openness, integrity, and accountability. We expect all volunteers and staff members to maintain these high standards while representing our platform.

The purpose of this policy is to provide a secure internal framework where volunteers and staff can confidently raise serious concerns regarding misconduct, illegal acts, or operational failures within ScoutSwap without fear of victimization, discrimination, or disadvantage.

Scope

This policy applies to all ScoutSwap volunteers, team leads, managers, and directors.

A standard grievance or personal complaint regarding a volunteer's own role is covered under separate volunteer guidelines or the standard Complaints Policy. Whistleblowing specifically applies when an individual raises a concern about a danger, risk, or wrongdoing that affects others, the public interest, or the platform's regulatory standing.

Qualifiable Disclosures

Whistleblowing concerns typically relate to the conduct of fellow volunteers, management, or the structural operations of ScoutSwap itself. Volunteers should use this policy if they reasonably believe that one or more of the following is occurring, has occurred, or is likely to occur within the organisation:

- **Safeguarding breaches or cover-ups:** Intentional failure to follow safeguarding measures, ignoring reported grooming risks, or management failing to escalate a child protection concern to external authorities.
- **Criminal activity:** Fraud, theft, data manipulation, or the intentional breach of UK company law or financial regulations.
- **Data protection violations:** Deliberate leaks of the user database, intentional misuse of sensitive Didit verification outputs, or a systematic refusal by management to report severe data breaches to the ICO.
- **Environmental damage:** Deliberate actions that directly contradict or mock the digital sustainability goals of our Environmental Policy.
- **Concealment:** Intentionally hiding or destroying evidence relating to any of the above points.

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Protections for Whistleblowers

Freedom from Retaliation

ScoutSwap guarantees that no volunteer will suffer any detriment, harassment, loss of volunteer status, or exclusion from the platform as a direct result of raising a genuine concern under this policy. Any member of staff or management who attempts to penalize a whistleblower will face immediate disciplinary action, up to and including permanent dismissal.

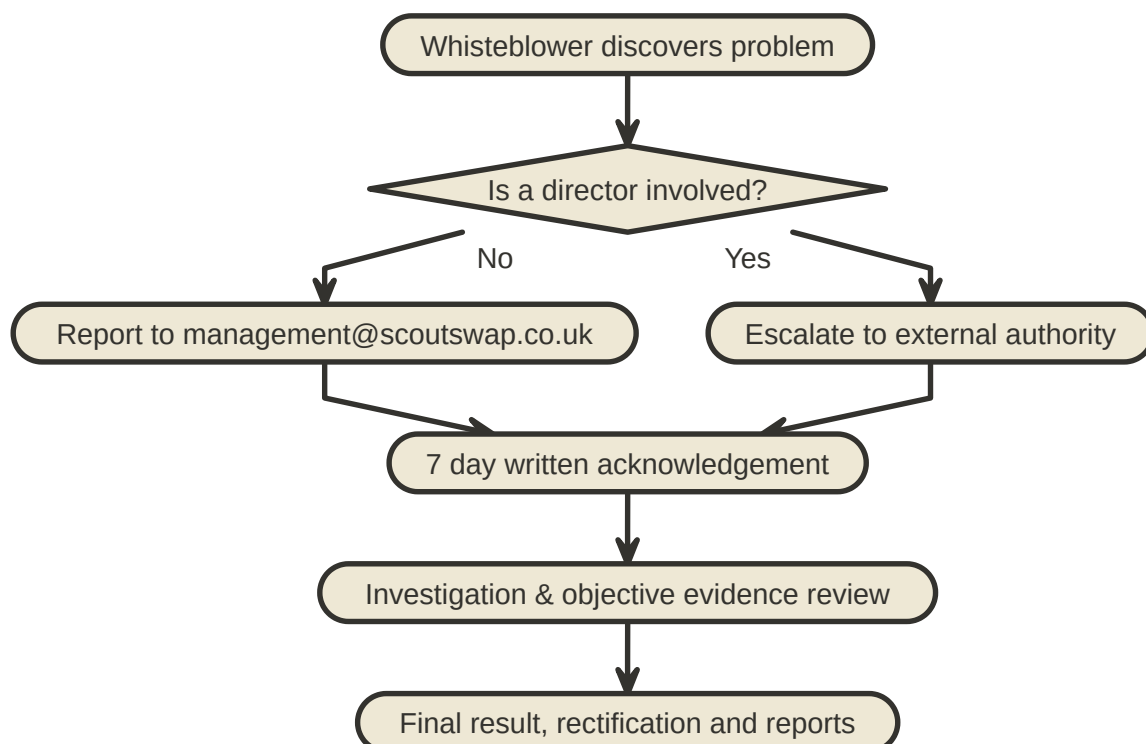
Confidentiality

Every effort will be made to keep the whistleblower's identity strictly confidential if requested. However, as an investigation progresses, it may occasionally become necessary to reveal the source of the report (for example, if a formal statement is required by law enforcement or external safeguarding authorities). If this occurs, the whistleblower will be notified in advance.

Anonymous Reports

While volunteers are encouraged to put their names to disclosures to facilitate thorough investigations, anonymous whistleblowing reports will still be accepted and evaluated by the Directors.

Reporting Procedure



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Internal Escalation Path

If a volunteer discovers a qualifying wrongdoing, they should report it via email to management@scoutswap.co.uk marked "CONFIDENTIAL: WHISTLEBLOWING".

The report will be handled by the non-conflicted Directors. If the report concerns a specific Director, that individual will be entirely locked out of the investigation loop to maintain objectivity.

External Reporting

If a volunteer feels that the entire internal management team is compromised, or that a reported issue has been completely ignored by the Directors, they have the right to contact relevant external regulators directly:

- **Safeguarding:** The World Organisation of the Scout Movement (WOSM) safeguarding team, or local emergency services/authorities.
- **Data protection breaches:** The Information Commissioner's Office (ICO).
- **Governance:** The Office of the Regulator of Community Interest Companies.

Investigation & Response Timeline

1. The non-conflicted Directors will send a written acknowledgement to the whistleblower within 7 working days.
2. A Director will be appointed to lead a confidential review of the evidence, infrastructure logs, or communication paths relevant to the claim.
3. ScoutSwap aims to conclude internal whistleblowing reviews within 30 working days. The whistleblower will be provided with an update on the findings and any structural actions taken, provided it is lawful to disclose them.

Review and Responsibility

This policy is reviewed annually to ensure it remains aligned with UK company law, Public Interest Disclosure principles, and our core safeguarding values.

Last review: Jun 2026

Next review: Jun 2027

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Approval

Approved by the directors on 08/06/2026.

Joe Biondani
Director

Oscar Grothusen
Director