

Whistleblowing Policy

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School:	<i>All</i>
Issue:	<i>2.0</i>
Owner:	<i>The HR Director</i>
Approved by:	<i>The Executive Board</i>
Effective date:	<i>26 August 2025</i>
Next review due by:	<i>15 August 2026</i>

1. Summary

Educ8 Independent School is committed to the highest standards of openness, integrity, and accountability. The Whistleblowing Policy provides a clear process for staff, volunteers, and others connected with the school to raise genuine concerns about malpractice, impropriety, or unsafe practices without fear of reprisal. It reflects the Public Interest Disclosure Act 1998 and ensures that disclosures made in good faith are protected by law.

Whistleblowing plays a vital role in safeguarding children. In line with Keeping Children Safe in Education 2025, all staff are encouraged to raise concerns about the conduct of colleagues, unsafe safeguarding practices, or low-level concerns about staff behaviour. Where staff feel unable to raise an issue internally, or believe their concerns are not being addressed, they are supported to contact the Local Authority Designated Officer (LADO), the NSPCC Whistleblowing Helpline, or another prescribed body.

The policy guarantees confidentiality, protection against retaliation, and clear timescales for acknowledgement and response. Oversight of whistleblowing is provided by the Executive Board and Board of Trustees, with anonymised concerns reviewed termly to ensure transparency and compliance. All staff receive training on whistleblowing procedures at induction and annually as part of safeguarding updates.

2. Document Release

This document has been reviewed in accordance with the Educ8 Quality System and the requirements of this policy. Staff have been made aware of its issue, including any updates/amendments to its contents and where necessary appropriate training has been provided to those staff.

Where policies are available for download online, the previous version is removed and this new version replaces it.

The release of this document is indicated by the effective date.

This policy will be formally reviewed annually by the Executive Board and Board of Trustees, taking into account any changes to statutory guidance.

3. Purpose & Scope

Educ8 Independent School is committed to the highest standards of honesty, integrity, and accountability. This Whistleblowing Policy provides a framework for staff, volunteers, governors, and others connected with the school to raise genuine concerns about wrongdoing, malpractice, or unsafe practices. It ensures that such concerns can be raised without fear of reprisal and with the confidence that they will be taken seriously and addressed appropriately.

The policy is designed to meet the requirements of the **Public Interest Disclosure Act 1998**, the **Independent School Standards (Part 8: Leadership**

and Management), and **Keeping Children Safe in Education 2025**. It applies to all aspects of the school's operations, with particular emphasis on safeguarding and child protection. Staff are encouraged to raise concerns at the earliest opportunity, whether relating to the conduct of colleagues, failures in safeguarding practice, health and safety risks, financial malpractice, or any behaviour that could compromise the welfare of pupils or the reputation of the school.

Where staff feel unable to raise an issue internally, or believe their concerns have not been adequately addressed, this policy ensures they are supported to escalate externally, including to the **Local Authority Designated Officer (LADO)**, the **NSPCC Whistleblowing Helpline**, or another prescribed body.

4. Basis

- 4.1 The Public Interest Disclosure Act 1998 (PIDA) provides legal protection to employees against dismissal or detriment as a result of raising genuine concerns. Educ8 endorses these provisions to ensure no staff member is disadvantaged in raising legitimate concerns. This policy demonstrates that we:
- Will not tolerate malpractice.
 - Respect confidentiality where possible.
 - Provide clear routes for raising concerns, including outside line management.
 - Treat malicious or vexatious allegations as a disciplinary matter.
 - Provide a simple, accessible procedure for all staff
- 4.2 The Executive Board and Board of Trustees are responsible for ensuring that the school has effective whistleblowing arrangements in place, that all staff are aware of them, and that concerns are dealt with fairly, promptly, and transparently.

5. Safeguards

- 5.1 This policy protects staff who raise concerns in good faith. Disclosures will be treated sensitively and, where possible, confidentially. All safeguarding concerns, including low-level concerns, must be raised in line with KCSIE 2025. Where concerns are not addressed satisfactorily, staff are supported to escalate externally (LADO, NSPCC, Ofsted, DfE, or other prescribed bodies).
- 5.2 Staff who raise concerns will not be penalised, even if concerns are unsubstantiated. Retaliation against whistleblowers will be treated as a disciplinary matter.
- 5.3 The school actively encourages staff to raise concerns early and assures them that doing so is a professional responsibility and will be supported at every stage.

6. Anonymous Allegations

- 6.1 This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company.
- 6.2 In exercising this discretion, the factors to be taken into account will include:
- The seriousness of the issues raised
 - The credibility of the concern
 - The likelihood of confirming the allegation from attributable sources

7. Untrue Allegations

- 7.1 If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

8. Support for Employees

- 8.1 Throughout and after this difficult process employees will be given full support from senior management, concerns will be taken seriously and Educ8 will do all it can to help employees. If possible, redeployment opportunities will be considered. Employees may also wish to seek confidential support from their Trade Union/ Professional Association.
- 8.2 The school will ensure that all staff, volunteers, and governors receive training on the whistleblowing procedure as part of their induction and as part of annual safeguarding updates.

9. Procedures for Making a Disclosure

- 9.1 Concerns should normally be raised with the Complaints Officer in the first instance. If this is not appropriate, they may be raised with an alternate Director, the Executive Board Chair, the DSL, or an external body such as the LADO, NSPCC, Ofsted, or the Department for Education.
- 9.2 Whistleblowers will normally receive a written acknowledgement of their concern within **5 working days** and an initial response or update within **20 working days**. Where investigations take longer, regular updates will be provided.

10. Investigating Procedure

- 10.1 Investigations will be conducted promptly, fairly, and independently, with outcomes communicated in writing. Staff involved will have the right to representation, and safeguarding concerns will be escalated to the DSL and, where appropriate, the LADO or police.

11. Data Protection and GDPR

- 12.1 The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of Children.
- 12.2 It is important that governing bodies/boards of trustees are aware of their obligations under the Data Protection Act 2018 and the GDPR to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- 12.3 Relevant staff should have due regard to data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018 and the GDPR and be confident of the processing conditions that allows practitioners to store and share information for safeguarding purposes, including information that is sensitive and personal, and should be treated as 'special category personal data.' This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

13. Monitoring and Review

- 13.1 Whistleblowing concerns and their outcomes will be logged and reported (anonymised where appropriate) to the Board of Trustees on a termly basis to ensure accountability and to identify any recurring themes.

14. Forms & Templates

There following form(s)/template(s) are required for this document:

- F0028HR Witness Statement

Issue & Revision History

Issue	Description	Author	Effective Date
1.0	Initial Release	D. Payne	28/06/16
1.1	Annual review	D. Payne	20/06/17
1.2	Annual Review	D. Payne	18/08/18
1.3	Annual Review Addition of Appendix A Key Contacts Complaints Officer amendment Reference to F0028HR Witness Statement Review frequency set to 3 years	T. Warner	18/09/19
1.4	Annual Review Addition of: KCSIE references: 7.9 Data Protection and GDPR 7.5 Support for Employees	T. Warner	23/08/22
1.5	Annual Review KCSIE 2023 updates: Summary - general update reflecting changes Scope - addition of 'Low-level' concerns 7.6 Addition of LADO 7.8 Addition of Safeguarding Incidents and alternative reporting chain	T. Warner	01/09/23
1.6	Annual Review	T. Warner	26/08/24
2.0	<p>The Whistleblowing Policy has been updated and refined to ensure compliance with KCSIE 2025, the Independent School Standards (Part 8), and the Public Interest Disclosure Act 1998 (PIDA). Key changes are:</p> <p>Purpose & Scope – rewritten to be clearer, safeguarding-led, and explicitly reference KCSIE 2025, ISS, and PIDA.</p> <p>Governance – explicit responsibility placed on the Executive Board and Board of Trustees for oversight.</p> <p>Safeguarding emphasis – strengthened to cover all safeguarding concerns (including low-level concerns) with clear escalation routes (DSL, LADO, NSPCC, Ofsted, DfE).</p> <p>Staff protection – assurance added that no staff will be penalised for raising concerns in good faith, even if unsubstantiated.</p> <p>Timescales – clarified: acknowledgement within 5 working days, initial update within 20 working days.</p> <p>Procedures simplified – Section 9 streamlined; Sections 9.2, 9.3 and 10 removed to avoid duplication and complexity; essential reporting routes and timescales</p>	T. Warner	26/08/25

	<p>retained in 9.1.</p> <p>Investigation procedure – simplified for staff (fair, prompt, independent, safeguarding escalated if needed).</p> <p>Training – confirmation that all staff receive whistleblowing training at induction and annually.</p> <p>Monitoring & Review – anonymised whistleblowing concerns logged and reviewed termly by the Board, with policy reviewed annually.</p> <p>Data Protection – confirmed that GDPR/Data Protection Act 2018 allow lawful sharing of safeguarding information.</p>		
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