

Whistleblowing Policy

Document number	2-7
Applies to	All Educ8 schools and provisions
Issue	3-0
Author	Director – Finance, HR, People and Development
Portfolio Director	Director of Education, Safeguarding & Standards
Approved by	Executive Board
Effective date	1 September 2026
Next review due by	1 September 2027

2. Issue and Revision History

Issue	Description	Author	Effective date
1.0	Initial release	D. Payne	28/06/2016
1.1–1.6	Annual reviews and updates, including KCSIE, safeguarding, data protection and reporting-route amendments	T. Warner / D. Payne	2017–2024
2.0	Substantial review aligned to KCSIE 2025, the Independent School Standards and existing Educ8 governance arrangements	T. Warner	26/08/2025
3.0	Full rewrite aligned to KCSIE 2026, current government and Acas whistleblowing guidance and the Employment Rights Act 2025. Added statutory tests, sexual-harassment protection, safeguarding distinctions, independent reporting routes, investigation procedure, external routes, quality records and case-management templates. Separated governance oversight from the receipt, management, investigation and review of individual disclosures.	T. Warner	01/09/2026

3. Summary

Educ8 is committed to a culture in which workers and others connected with its schools and provisions feel able to speak up about wrongdoing, unsafe practice and failures which may affect pupils, colleagues, the public or Educ8's legal and regulatory responsibilities.

This policy explains what whistleblowing is, the protection available, how a concern can be raised, how Educ8 will respond and the alternative routes available where an individual does not feel able to report internally or believes that a concern has not been addressed.

Whistleblowing has a particularly important role in safeguarding children. The policy distinguishes systemic or organisational safeguarding failures from immediate concerns about a child, allegations about adults working with children and low-level concerns, each of which has its own reporting route.

No person is required to prove a concern or investigate it themselves before reporting. Educ8 will not tolerate dismissal, victimisation, harassment or any other detriment because a person has raised or supported a protected disclosure or a genuine concern under this policy.

4. Document Release

This document has been reviewed in accordance with the Educ8 Quality System, current statutory guidance and the requirements applicable to Educ8's schools and provisions.

Following approval, relevant staff will be informed of its publication and any material changes to its content. Appropriate guidance or training will be provided where required to support effective implementation.

Where the policy is published electronically, the previous version will be removed or archived and replaced by the approved version. The effective date shown on the document indicates the date from which this version applies.

This policy will be reviewed at least annually and sooner where required by changes to legislation or statutory guidance, significant disclosures, identified safeguarding or organisational risks, learning from cases or concerns about the effectiveness of Educ8's arrangements.

The policy will be reviewed by the Director with portfolio responsibility for Finance, HR, People and Development before being presented to the Executive Board for final approval.

5. Purpose

The purpose of this policy is to:

- encourage concerns about wrongdoing, malpractice, unsafe practice or safeguarding failures to be raised promptly and through accessible routes;
- ensure disclosures are received, assessed, investigated and resolved fairly, consistently and without avoidable delay;
- protect workers from dismissal, victimisation, harassment and other detriment arising from protected disclosures;
- provide appropriate internal alternatives where normal management routes are unsuitable or give rise to a conflict of interest;
- ensure safeguarding concerns are directed immediately into the correct child-protection, allegations or low-level concerns procedure;
- provide access to external advice and prescribed reporting routes; and
- enable the Executive Board and relevant proprietor companies to receive assurance and identify recurring risks, cultural issues and required improvements.

6. Scope

This policy applies across all Educ8 schools, alternative provision settings, central functions and other education services. It may be used by:

- employees and former employees;
- agency, supply and temporary workers;
- contractors, consultants, apprentices, trainees and people undertaking work experience;
- Executive Board members and others undertaking governance responsibilities;
- volunteers; and
- any other person who becomes aware of possible wrongdoing through work carried out for or on behalf of Educ8.

The statutory definition of a worker for whistleblowing purposes is broad but does not protect every person covered by this policy. Volunteers, genuinely self-employed contractors and non-executive directors are unlikely to receive statutory whistleblowing protection solely because they fall within one of those categories. Educ8 nevertheless expects concerns from all persons within this policy's scope to be taken seriously and will not tolerate retaliation against anyone who raises a genuine concern.

Parents, carers, pupils, members of the public and commissioners who wish to raise a concern will normally use the relevant complaints or safeguarding procedure. Where information from any source indicates public-interest wrongdoing or systemic failure, Educ8 may decide to manage or cross-refer the matter under this policy.

7. Legal and Regulatory Framework

This policy has been prepared with regard to the following legislation, standards and guidance, as amended or replaced from time to time:

- the Employment Rights Act 1996, particularly Part IVA on protected disclosures;
- the Public Interest Disclosure Act 1998;
- the Enterprise and Regulatory Reform Act 2013;
- the Employment Rights Act 2025, including the express protection relating to disclosures about sexual harassment from 6 April 2026;
- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children 2026;
- the Education (Independent School Standards) Regulations 2014, particularly Parts 3 and 8;
- the Equality Act 2010;

- the Health and Safety at Work etc. Act 1974;
- the Bribery Act 2010 and relevant fraud legislation;
- the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025; and
- current government and Acas whistleblowing guidance and the government list of prescribed people and bodies.

Status of guidance: KCSIE 2026 applies from 1 September 2026. Appropriate whistleblowing procedures must enable staff and volunteers to raise concerns about poor or unsafe safeguarding practice and potential failures in safeguarding provision.

8. Definitions

Term	Definition
Disclosure	Information communicated about wrongdoing. A disclosure may be made orally or in writing and does not need to use legal terminology.
Protected disclosure	A qualifying disclosure made by a worker through a route protected by the Employment Rights Act 1996.
Qualifying disclosure	A disclosure of information which the worker reasonably believes is in the public interest and tends to show one or more specified types of wrongdoing.
Public interest	A reasonable belief that the concern affects or may affect people beyond the individual's own private interest, although a disclosure may also involve a personal impact on the individual.
Worker	A person falling within the extended statutory definition for whistleblowing purposes. Whether an individual is legally a worker depends on the facts and their working arrangements.
Whistleblower	A person who raises a whistleblowing concern or makes a disclosure.
Governance Lead for Whistleblowing	The Chair of the Executive Board, designated to provide governance oversight of Educ8's whistleblowing arrangements, act as a senior reporting and escalation route, ensure concerns are managed independently and provide anonymised assurance to the Executive Board. The Governance Lead will not ordinarily act as case manager or investigator.
Alternative Director	An Executive Board Director nominated to receive and oversee concerns where the Governance Lead is implicated, unavailable, has previously been involved or may otherwise have an actual or reasonably perceived conflict of interest.
Case Manager	An unconflicted Director or suitably independent external person appointed to manage a particular disclosure. The case manager is responsible for acknowledgement, initial assessment, appointment of an investigator, communications, decisions, records and completion of required actions.
Detriment	A disadvantage or adverse treatment because a person made, supported or was believed to have made a protected disclosure. Examples include threats, bullying, harassment, reduced hours, denied development, exclusion or damage to career prospects.
Prescribed person	A regulator, public authority or other body specified in law to which protected disclosures may be made about matters within its prescribed remit.
Head of Safeguarding	The Educ8-wide safeguarding leadership role undertaken by the Head of Safeguarding & Awarding Organisation Compliance. The role provides safeguarding advice, coordination and oversight across Educ8 but does not replace the statutory responsibilities of each school's DSL or deputy DSL.
LADO	Local Authority Designated Officer responsible for managing and overseeing allegations that an adult who works with children may have harmed a child, committed a relevant offence or may pose a risk of harm.
Low-level concern	A concern about adult behaviour towards a child which is inconsistent with the staff code of conduct but does not meet the harm threshold, as defined in KCSIE and Educ8's safeguarding arrangements.

9. Principles and Protection

9.1 Open and speak-up culture

Educ8 expects leaders to create an environment in which concerns are welcomed, listened to and acted upon. Raising a concern is a responsible action. A person must not be criticised for using this policy or pressured to remain silent.

Managers who receive information which may amount to whistleblowing must recognise it, preserve confidentiality and refer it promptly to the Governance Lead for Whistleblowing or another unconflicted Director. The receiving Director must complete an initial conflict check and arrange for an appropriate case manager to be appointed. Managers must not dismiss, suppress or investigate the concern informally outside this policy. They must not dismiss, suppress or investigate the concern informally outside this policy.

9.2 Statutory protection

A worker will generally qualify for statutory protection where they reasonably believe that the disclosure is in the public interest, reasonably believe that it tends to show one or more specified types of wrongdoing and make it through an appropriate channel. The disclosure does not need to be proven or ultimately substantiated.

Good faith is not a condition of statutory whistleblowing protection. However, knowingly false information, dishonesty or an improper personal motive may be relevant to how Educ8 responds and, where applicable, to any compensation awarded by an employment tribunal.

9.3 No detriment or retaliation

Educ8 will not subject a person to dismissal, victimisation, harassment, threats or any other detriment because they have made, supported or are believed to have made a protected disclosure or genuine concern under this policy.

Any person who believes they have experienced retaliation must report this immediately to the case manager, Governance Lead for Whistleblowing or another unconflicted Director. Where the alleged retaliation involves any of those persons, it must be reported through an alternative internal or external route. Retaliation, attempts to identify an anonymous whistleblower without authority, interference with an investigation or pressure to withdraw a concern may result in disciplinary or contractual action.

9.4 Confidentiality

Educ8 will take reasonable steps to protect the identity of the whistleblower and will share information only with those who need it to assess, investigate, safeguard, obtain advice, meet legal obligations or take action.

Absolute confidentiality cannot be guaranteed. Identity may need to be disclosed where required by law, a safeguarding or regulatory obligation, procedural fairness or the effective investigation of serious wrongdoing. Wherever reasonably possible, the whistleblower will be consulted before their identity is disclosed. Educ8 cannot guarantee that identity will not be inferred from the nature or circumstances of the concern.

A confidentiality or non-disclosure clause cannot lawfully prevent a worker from making a protected disclosure through an appropriate route.

9.5 Anonymous concerns

Concerns may be raised anonymously. Every anonymous concern will be assessed according to the information provided, seriousness, potential risk, credibility and the possibility of obtaining information from other sources. Anonymity can limit Educ8's ability to clarify information, investigate fully, protect the whistleblower or provide feedback.

An anonymous safeguarding concern will never be disregarded merely because the identity of the person reporting it is unknown.

9.6 Unsubstantiated and knowingly false concerns

No action will be taken against a person merely because a concern is not confirmed by an investigation or because they were mistaken. An unsubstantiated concern is not, by itself, evidence that it was malicious.

Where there is evidence that a person deliberately provided information they knew to be false, acted dishonestly or made a malicious allegation, Educ8 may consider action under the relevant disciplinary or contractual procedure. This must be determined separately and fairly and must not be used to discourage legitimate concerns.

10. What May Be Reported

10.1 Qualifying types of wrongdoing

A qualifying disclosure is information which the worker reasonably believes is in the public interest and tends to show that one or more of the following has occurred, is occurring or is likely to occur:

- a criminal offence;
- a breach of a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any person;
- sexual harassment;
- damage to the environment; or
- the deliberate concealment of information tending to show any of the above.

10.2 Examples relevant to Educ8

Examples which may fall within this policy include:

- systemic safeguarding failures, unsafe practice or repeated failures to follow safeguarding procedures;
- failure to act on concerns about a child, an adult working with children or a risk within a school or provision;
- fraud, theft, bribery, corruption, falsification of records, financial irregularity or misuse of public or company funds;
- serious breaches of the Independent School Standards, education law, health and safety duties, equality duties or data-protection law;
- sexual harassment affecting workers or others within the workplace;
- serious examination, assessment, qualification or awarding-organisation malpractice;
- deliberate concealment of inspection, safeguarding, financial, attendance, behaviour, health and safety, employment or regulatory information;
- retaliation against a whistleblower or interference with a disclosure or investigation; and
- instructions to conceal wrongdoing or prevent a required report or referral.

This list is illustrative. A concern does not need to use the words whistleblowing or protected disclosure. If the information may reasonably amount to whistleblowing, Educ8 will treat it accordingly.

10.3 Matters normally addressed under another procedure

Matter	Usual procedure
A personal employment complaint affecting only the individual	Grievance, dignity at work or other relevant HR procedure
A complaint from a parent, carer, pupil, commissioner or member of the public	Complaints Policy, unless the information indicates public-interest wrongdoing or systemic failure
A concern that a child is suffering or likely to suffer harm	Safeguarding and Child Protection Policy immediately
An allegation that an adult working with children has harmed or may pose a risk of harm	Allegations against Staff procedure and LADO arrangements

Matter	Usual procedure
Adult behaviour towards a child that does not meet the harm threshold	Low-Level Concerns procedure
A disagreement with a legitimate management decision	Relevant management, appeal or grievance route, unless the concern also discloses public-interest wrongdoing

A matter may contain both a grievance and a whistleblowing disclosure or require more than one procedure. Educ8 will identify the elements, explain the approach and coordinate the procedures so that safeguarding or regulatory action is not delayed.

11. Roles and Responsibilities

Role	Principal responsibilities
Relevant proprietor company and Executive Board	Retain legal and strategic responsibility; approve the policy; ensure effective and independent arrangements; receive anonymised assurance; challenge recurring issues; and ensure adequate resources and corrective action.
Director – Finance, HR, People and Development	Own and review the policy; ensure alignment with employment law and related procedures; support implementation and training; and advise on employment actions arising from a case, provided there is no conflict.
Governance Lead for Whistleblowing – Chair of the Executive Board	Provide governance oversight; promote confidence in Educ8's arrangements; act as a senior reporting and escalation route; ensure conflicts are identified; arrange independent case management; monitor timeliness and corrective actions; maintain oversight of the central register; and provide anonymised assurance to the Executive Board. The Governance Lead will not ordinarily investigate or make operational decisions in individual cases.
Nominated Alternative Director	Receive concerns where the Governance Lead is implicated, unavailable, has previously been involved or may otherwise be conflicted; arrange independent case management; provide an alternative internal review route; and provide governance assurance where the Governance Lead cannot do so.
Executive Headteachers and Headteachers	Promote a speak-up culture; make the policy accessible; ensure staff understand reporting routes; receive and route concerns correctly; act immediately on safeguarding matters; and avoid conducting informal investigations outside their authority.
Head of Safeguarding & Awarding Organisation Compliance and site DSLs	The Head of Safeguarding provides Educ8-wide safeguarding advice, coordination and oversight. Site DSLs and deputy DSLs act immediately on safeguarding information; advise on KCSIE reporting routes; make or support required referrals; preserve safeguarding records; and coordinate with the appointed case manager and Governance Lead for Whistleblowing without transferring the site DSL's safeguarding accountability.
DPO	Advise on lawful, fair and secure handling of personal information, information sharing, data breaches, access rights and retention.
Case manager	Acknowledge and assess the disclosure; take or arrange urgent action; manage confidentiality and conflicts; appoint an appropriate investigator; agree terms of reference; keep the whistleblower updated; maintain the restricted case record; determine or refer the outcome; and verify completion of actions.
Investigator	Act independently and without conflict; preserve and examine evidence; conduct a fair and proportionate investigation; maintain confidentiality; and report findings, limitations and recommendations to the case manager.
All workers and persons within scope	Raise concerns promptly; provide information honestly; preserve relevant information; maintain appropriate confidentiality; cooperate with an authorised investigation; and report retaliation or interference.

Conflict safeguard: No person will receive, manage, investigate, review or decide a concern where they are implicated, have previously been materially involved or where their involvement creates an actual or reasonably perceived conflict. The Governance Lead will not ordinarily act as case manager or investigator. An unconflicted Director or suitably independent external person will be appointed where required.

12. Reporting a Concern

12.1 Immediate danger, crime or safeguarding risk

A concern involving immediate danger, a child at risk of harm or a suspected crime must not wait for the whistleblowing process. Staff must follow the Safeguarding and Child Protection Policy immediately and contact emergency services, children's social care, the LADO or police where required. An unconflicted Director should be informed where the concern also indicates systemic failure, concealment or wider wrongdoing. That Director must arrange appropriate case management and notify the Governance Lead for Whistleblowing for assurance purposes, provided the Governance Lead is not implicated or conflicted.

12.2 Reporting route guide

Concern	Immediate route
General public-interest wrongdoing, malpractice or systemic failure	Governance Lead for Whistleblowing or any other unconflicted Director. The recipient will arrange appointment of an appropriate case manager.
Concern about the Governance Lead or Chair	Nominated Alternative Director. The Alternative Director will arrange independent case management and governance oversight.
Concern involving a Director or several senior leaders	Governance Lead if unconflicted; otherwise the Nominated Alternative Director or a suitably independent external recipient acting on Educ8's behalf. An appropriate prescribed person may also be contacted.
Concern that a child is suffering or likely to suffer harm	DSL or deputy DSL immediately; children's social care or police as required
Allegation that an adult working with children may have harmed a child or may pose a risk	Headteacher without delay; if the concern or allegation is about the Headteacher, the Proprietor through the nominated proprietor contact identified in the Safeguarding and Child Protection Policy; direct to the relevant LADO where KCSIE requires or where there is a conflict of interest.
Low-level concern about adult behaviour towards a child	Route specified in the Low-Level Concerns procedure
Poor or unsafe safeguarding practice or potential failure in safeguarding provision	Senior leadership, the Head of Safeguarding, the Governance Lead for Whistleblowing or another unconflicted Director. The NSPCC Whistleblowing Advice Line is available where the person cannot report internally or believes that the concern is not being addressed..

12.3 How to make an internal disclosure

A concern may be raised orally or in writing, in person, by telephone or by email. The person should make clear, where possible, that they are raising a whistleblowing or public-interest concern. No particular form is required and the optional record at Appendix 2 must not be used as a barrier to reporting.

A written disclosure should be marked Private and Confidential – Whistleblowing and sent directly to the Governance Lead for Whistleblowing or another unconflicted Director. Where the concern involves the Governance Lead or Chair, it should be sent to the Nominated Alternative Director. The recipient must arrange appropriate case management and must not investigate the matter personally unless formally appointed and free from conflict. A line manager who receives a disclosure must record the information accurately and refer it promptly to the correct recipient.

12.4 Information to provide

The person should provide whatever information they reasonably have, which may include:

- the nature of the concern and why it is believed to be in the public interest;
- who or what is involved;
- relevant dates, locations and events;
- whether the concern has been raised previously and the response received;
- the existence and location of relevant records or witnesses; and
- any immediate risk to a child, adult, evidence, finances, information or health and safety.

The whistleblower is not required to investigate, obtain proof or gather additional evidence. They must not access records without authority, remove original documents, hack systems, secretly record unlawfully or commit any offence in order to support a concern.

12.5 Support and accompaniment

The whistleblower may be accompanied at meetings by a workplace colleague or trade union representative. Educ8 may agree another suitable support person where appropriate. The companion must respect confidentiality and must not have a conflict of interest.

Workers may seek independent advice from Acas, Protect, a trade union or professional association, or a legal adviser. Contact routes are set out in Appendix 1.

13. Safeguarding and Whistleblowing

13.1 Concerns about a child

Any concern about a child's welfare must be acted upon immediately through the Safeguarding and Child Protection Policy. A person may make a direct referral to children's social care where necessary. A safeguarding referral must not be delayed while seeking management approval or deciding whether the matter is whistleblowing.

13.2 Concerns or allegations about adults working with children

A safeguarding concern or allegation that an adult working with children has harmed a child, may have harmed a child, possibly committed a criminal offence against or related to a child, behaved in a way indicating they may pose a risk of harm, or may not be suitable to work with children must be reported without delay under Educ8's allegations procedure.

- concerns about a member of staff, supply worker, trainee, volunteer or contractor must be reported to the Headteacher;
- concerns about the Headteacher must be reported to the Proprietor through the nominated proprietor contact identified in the Safeguarding and Child Protection Policy; and
- where reporting to the Headteacher creates a conflict, or where KCSIE otherwise requires, the concern must be reported directly to the relevant LADO.

The case manager will consult the LADO where required. The Governance Lead for Whistleblowing may provide governance oversight but must not take over the statutory allegations process. Where KCSIE requires the Chair or proprietor to act as case manager for an allegation concerning a Headteacher, the Chair may undertake that role provided they are free from conflict and follow the applicable LADO arrangements.

13.3 Low-level concerns

Adult behaviour towards a child which does not meet the harm threshold must be reported and recorded under Educ8's Low-Level Concerns procedure. If there is doubt about whether the harm threshold is met, the LADO should be consulted. A pattern of low-level concerns or evidence that concerns are being suppressed may itself amount to a whistleblowing concern about safeguarding practice.

13.4 Poor or unsafe safeguarding practice

All staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in Educ8's safeguarding provision. Where a person feels unable to raise the matter internally or believes their genuine concern is not being addressed, the NSPCC Whistleblowing Advice Line is available as an alternative route. Details are in Appendix 1.

14. Receipt and Initial Assessment

14.1 Acknowledgement

On receiving a disclosure, the recipient must preserve the information, consider any immediate risks and complete an initial conflict check. The recipient must then arrange for an appropriate case manager to be appointed. Where contact details are available, the case manager—or the original recipient pending appointment—will normally acknowledge the disclosure in writing within five working days.

14.2 Initial meeting and assessment

The appointed case manager will normally arrange a confidential discussion with the whistleblower to understand the information, immediate risks, confidentiality concerns and support needs. If a case manager has not yet been appointed, an unconflicted recipient may undertake this initial discussion solely to identify urgent action and clarify the disclosure. The whistleblower may be accompanied as set out in section 12.5.

The initial assessment will consider:

- whether the information may amount to whistleblowing, safeguarding, an allegation, a low-level concern, a grievance, a complaint or a combination;
- whether immediate protective, safeguarding, regulatory, financial, technical or evidence-preservation action is required;
- whether the recipient or any proposed decision-maker has a conflict of interest;
- whether external advice or referral is required;
- the appropriate case manager, investigator, scope and timescale; and
- the information that can be provided to the whistleblower without compromising confidentiality, fairness or legal obligations.

The whistleblower will normally receive an initial written response or update within 20 working days. This is an update on handling and may not be the final outcome. Where more time is required, the reason and expected next update will be explained so far as it is lawful and appropriate to do so.

14.3 Possible initial decisions

Following assessment, Educ8 may:

- take immediate action and commission an investigation;
- refer the matter to a safeguarding, disciplinary, grievance, complaints, fraud, health and safety, data-protection or other procedure;
- refer or report the matter to the LADO, children's social care, police, DfE, regulator, awarding organisation or other authority;
- seek legal, HR, safeguarding, audit or specialist advice;
- combine related concerns or coordinate parallel procedures; or
- take no further action where there is insufficient information or no reasonable basis for investigation, while recording the decision and reasons.

15. Investigation Procedure

15.1 Appointment and independence

The case manager will appoint an investigator with appropriate competence, authority and independence. This may be an unconflicted senior employee, Director, HR adviser, safeguarding professional, auditor, solicitor or other external specialist. The investigator must disclose any actual or potential conflict before accepting the appointment.

15.2 Terms of reference

The case manager will document proportionate terms of reference covering the issues to be examined, immediate safeguards, applicable procedures, investigator, reporting arrangements, records, confidentiality, expected timescale and authority to access relevant information.

15.3 Fair and proportionate investigation

The investigation will be conducted promptly, objectively and proportionately. It may include interviews, examination of records, site or system checks, professional advice and liaison with external agencies. Records and evidence will be preserved securely.

A person whose conduct is under investigation will be treated fairly and will normally be informed of the substance of the concern and given an opportunity to respond, subject to safeguarding, evidence-preservation, legal or regulatory restrictions. The identity of the whistleblower will not be disclosed merely to facilitate confrontation or informal resolution.

Participation as a whistleblower is different from being a witness, complainant or party to disciplinary proceedings. The whistleblower may be asked for clarification or witness evidence but does not control the investigation or determine disciplinary or other action.

15.4 External investigations and referrals

Where the police, LADO, children's social care, a regulator, awarding organisation or other authority becomes involved, Educ8 will follow their directions and coordinate its internal process so that it does not prejudice an external investigation. Internal action may be paused or limited, but necessary safeguarding and protective measures will continue.

15.5 Updates

The case manager will provide reasonable progress updates where contact details are available. Updates may be limited where disclosure could prejudice an investigation, breach another person's rights, reveal confidential employment information or conflict with legal or regulatory requirements.

16. Outcomes, Feedback and Review

16.1 Investigation outcome

The investigator will provide a written report to the case manager setting out the evidence considered, findings on the balance of probabilities where appropriate, limitations, conclusions, required referrals and recommendations. The case manager or authorised decision-maker will determine the action to be taken.

Possible action may include safeguarding measures, process or control improvements, recovery of funds, training, disciplinary or contractual proceedings, regulatory notifications, referral to external authorities or no further action.

16.2 Feedback to the whistleblower

The whistleblower will normally be told when the matter has been concluded and whether the concern was substantiated, partly substantiated, not substantiated or could not be determined, together with a general indication of action where this can lawfully and fairly be provided.

The whistleblower is not entitled to receive confidential personal information, witness evidence, legal advice or details of disciplinary sanctions imposed on another person. A restriction on feedback does not mean that no action has been taken.

16.3 Internal review of handling

A whistleblower who reasonably believes the procedure was not followed, a material conflict was not addressed, relevant information was overlooked or retaliation has occurred may request an internal review within ten working days. The review will be undertaken by a person who had no previous material involvement in the case—normally the Governance Lead for Whistleblowing, provided they are unconflicted, or otherwise the Nominated Alternative Director or a suitably independent external reviewer.

The review is not a rehearing merely because the whistleblower disagrees with a properly reached outcome. The reviewer may confirm the handling, require further enquiries, appoint a new investigator or direct other corrective action. This internal review does not restrict access to legal advice or an appropriate external reporting route.

17. External Disclosures and Independent Advice

17.1 Appropriate external routes

A worker is not always required to report internally first. However, statutory protection depends on the recipient and the conditions applying to that route. A disclosure may be protected where made to the employer, another person reasonably believed to be responsible for the wrongdoing, a legal adviser while obtaining legal advice or an appropriate prescribed person whose remit covers the concern.

For external prescribed disclosures, the worker must reasonably believe that the matter falls within the prescribed person's remit and that the information and allegations are substantially true. The current government list should be checked before disclosure.

17.2 Relevant bodies

Subject	Potential route
Independent-school education matters	Secretary of State for Education / Department for Education
Child-protection failures where staff cannot report internally or believe concerns are not addressed	NSPCC Whistleblowing Advice Line
Allegations about adults working with children	Relevant local authority LADO – this is a safeguarding route, not a general prescribed-person route
Health and safety	Health and Safety Executive or relevant local authority, according to remit
Data protection	Information Commissioner's Office
Qualification or awarding-organisation malpractice	Relevant awarding organisation and, where within remit, Ofqual
Suspected crime or immediate danger	Police or emergency services

Ofsted should not be described as the routine prescribed whistleblowing body for Educ8's non-boarding independent schools. Its prescribed education remit is limited. The DfE or another body with the correct statutory remit should normally be identified.

17.3 Wider disclosure, media and social media

Disclosure to the media, publication on social media or disclosure to another third party is protected only in more limited circumstances and may breach confidentiality, safeguarding, data-protection or contractual obligations. A worker considering such a disclosure should seek independent legal advice or advice from Protect before acting.

18. Records, Confidentiality and Data Protection

18.1 Case records

The Whistleblowing Officer or alternative case manager will maintain a secure central register and case record. The appointed case manager will maintain the restricted record for the individual case. The Governance Lead for Whistleblowing will ensure that a secure central whistleblowing register is maintained for governance and assurance purposes. The central register will contain only the information reasonably necessary for oversight and will not unnecessarily reproduce sensitive case or safeguarding information.

Safeguarding information will be recorded in the appropriate safeguarding system or record in accordance with KCSIE. The whistleblowing register should cross-refer to the safeguarding record without unnecessarily duplicating sensitive child information.

18.2 Access and information sharing

Records will be accessible only to authorised persons with a need to know. Personal information may be shared without consent where necessary and lawful for safeguarding, investigation, legal proceedings, regulatory compliance, prevention or detection of crime or the protection of rights and safety.

Information will be handled in accordance with the Data Protection Act 2018, UK GDPR, Data (Use and Access) Act 2025, Educ8's privacy information and records-retention arrangements. Data-protection law must not be used as a reason to prevent necessary safeguarding or regulatory information sharing.

18.3 Retention

Whistleblowing records will be retained only for as long as necessary, taking account of the nature and outcome of the concern, safeguarding requirements, legal limitation periods, regulatory obligations, litigation holds and Educ8's records-retention schedule. Records will be disposed of securely when retention is no longer justified.

19. Monitoring, Assurance and Training

19.1 Executive Board assurance

The Governance Lead for Whistleblowing will provide an anonymised report to the Executive Board at least termly, drawing on information supplied by case managers. Where the Governance Lead has been involved in or conflicted from a case, the Nominated Alternative Director will provide the relevant assurance. The report will include, so far as it can without identifying individuals or compromising live matters:

- the number and broad category of concerns received;
- the route through which concerns were raised, including anonymous concerns;
- timeliness of acknowledgement, assessment, investigation and closure;
- broad outcomes and corrective actions;
- any allegation of retaliation or interference;
- recurring themes, control weaknesses, cultural issues and overdue actions; and
- assurance on training, awareness and policy effectiveness.

The Executive Board will challenge delays, repeated concerns and incomplete actions and will ensure that oversight does not reveal the whistleblower's identity unnecessarily or interfere with the independence of a case.

19.2 Training and awareness

- All staff will be told how to access this policy and the principal reporting routes at induction.
- Staff will receive a reminder or update at least annually as part of safeguarding or policy updates and whenever material changes are made.

- Headteachers, senior leaders, HR staff, DSLs, Directors and others who may receive or manage disclosures will receive role-specific guidance on recognising disclosures, confidentiality, safeguarding routes, conflicts and retaliation.
- The policy and reporting routes will be kept accessible, including for workers who are absent from work or have left Educ8.

20. Related Policies, Quality Records and Templates

20.1 Related policies and procedures

- Safeguarding and Child Protection Policy;
- Staff Behaviour / Code of Conduct and Low-Level Concerns procedure;
- Managing Allegations against Staff procedure;
- Grievance, Dignity at Work and Disciplinary procedures;
- Complaints Policy;
- Safer Recruitment Policy;
- Health and Safety Policy and incident-reporting arrangements;
- Anti-Fraud, Bribery and Corruption arrangements;
- Data Protection, Information Security and Personal Data Breach procedures; and
- Awarding-organisation malpractice and maladministration procedures.

20.2 Quality records

Required record	Custodian
Policy approval and revision record	Document owner / Executive Board
Secure whistleblowing central register	Governance Lead for Whistleblowing or authorised administrator
Disclosure and acknowledgement record	Appointed case manager
Initial assessment, conflicts and routing decision	Receiving Director and appointed case manager
Investigation terms of reference, evidence and report	Investigator / case manager
Safeguarding referral and case records	DSL / Headteacher / case manager as applicable
Outcome, actions, review and lessons learned	Case manager / responsible action owners
Termly anonymised assurance reports	Governance Lead for Whistleblowing or Nominated Alternative Director / Executive Board
Training and policy-awareness records	HR / Headteacher

20.3 Forms and templates

Reference	Title
Appendix 1	Reporting Routes and Key Contacts
Appendix 2	Optional Whistleblowing Concern Record
Appendix 3	Restricted Whistleblowing Case Management Checklist

The Appendix 2 form is optional. A concern must be accepted and acted upon whether it is raised orally, by email, in a letter, through a manager or anonymously.

Appendix 1 – Reporting Routes and Key Contacts

Route	Contact and use
Internal reporting routes	The Governance Lead for Whistleblowing – Chair of the Executive Board—or any other Educ8 Director who is not implicated or conflicted. Staff may approach the person with whom they feel most able to raise the concern. The recipient will arrange appointment of an appropriate case manager.
Concern about the Chair or Governance Lead	Nominated Alternative Director. Contact details must be included in the official Staff Contact Directory. The Alternative Director will arrange independent case management and oversight.
Immediate safeguarding concern	Site DSL or deputy DSL. Current names and contact arrangements are displayed at each site and set out in the Safeguarding and Child Protection Policy.
Independent external recipient	A suitably independent adviser formally authorised to receive disclosures on Educ8's behalf where the concern involves several Directors or no internal recipient is reasonably suitable. Contact details must be confirmed and published before this route is included.
Allegation about an adult working with children	Headteacher; if the concern or allegation is about the Headteacher, the Proprietor through the nominated proprietor contact identified in the Safeguarding and Child Protection Policy; direct to the relevant local authority LADO where KCSIE requires or where there is a conflict of interest. Each site must keep its local LADO details and current nominated proprietor contact readily accessible.
NSPCC Whistleblowing Advice Line	0800 028 0285; help@nspcc.org.uk . Available 08:00–20:00 Monday to Friday and 09:00–18:00 at weekends. For staff who cannot raise concerns about child-protection failures internally or are concerned about how a matter is being handled.
Department for Education	0370 000 2288; www.gov.uk/contact-dfe . The Secretary of State for Education is a prescribed person for matters relating to independent schools in England.
Current prescribed-person list	www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2
Acas	www.acas.org.uk/whistleblowing-at-work – independent employment guidance and access to the Acas helpline.
Protect	www.protect-advice.org.uk – independent UK whistleblowing charity providing confidential advice.
Emergency	999 where a child or other person is in immediate danger or a serious crime is in progress; otherwise use the appropriate police or safeguarding route.

Keep contacts current: Headteachers must ensure that the names of the DSL and deputies, local LADO details and current internal contact arrangements are readily accessible to staff. Changes to named postholders do not require the policy text to be rewritten where the role-based route remains unchanged.

Appendix 2 – Optional Whistleblowing Concern Record

This form may be used to record a concern but is not compulsory. A disclosure may be made orally or by any other accessible route.

Field	Information
Person raising the concern	Name (if provided): Role / relationship to Educ8: Preferred safe contact method:
Confidentiality	Is confidentiality requested? Yes / No Is anonymity requested? Yes / No Any specific risk if identity is disclosed:
Concern	What happened, is happening or is likely to happen:
Public-interest impact	Who may be affected and why the matter is believed to be in the public interest:
People, dates and locations	Relevant names, roles, dates, locations and events:
Immediate risk	Any immediate risk to a child, adult, health and safety, evidence, finances, systems or information:
Previous reporting	Has the concern been raised before? To whom, when and what response was received?
Existing information	Relevant documents, records or witnesses and where they may lawfully be found. Do not gather evidence without authority.
Support	Workplace colleague, trade union representative or other agreed support requested:
Declaration	I have provided the information honestly and understand that I do not need to prove or investigate the concern. Signed (optional): _____ Date: _____

Appendix 3 – Restricted Whistleblowing

Case Management Checklist

Restricted access: this checklist is for the appointed case manager, authorised investigator and, only where required for oversight, the Governance Lead for Whistleblowing or Nominated Alternative Director. It must not be placed on a general personnel file.

Stage	Minimum record
1. Receipt	Date/time received; route; recipient; contact details; anonymity/confidentiality request; exact information preserved.
2. Immediate risk	Safeguarding; LADO; police; children's social care; health and safety; data breach; finance; evidence preservation; interim protections.
3. Conflict check	Recipient, case manager, investigator and decision-maker checked for actual or perceived conflicts; alternative appointed where necessary.
4. Acknowledgement	Written acknowledgement within five working days where contact is possible; safe communication method agreed.
5. Classification	Whistleblowing; safeguarding; allegation; low-level concern; grievance; complaint; disciplinary; fraud; H&S; data protection; awarding organisation; combined route.
6. Initial assessment	Public-interest and wrongdoing considerations; seriousness; credibility; available information; external advice/referral; decision and reasons.
7. Support and protection	Companion; union/professional support; wellbeing; work arrangements; retaliation risks; confidentiality plan.
8. Investigation	Investigator appointed; independence confirmed; terms of reference; evidence plan; interviews; external-agency coordination; expected timescale.
9. Updates	Initial update within 20 working days; further update dates; reasons for any delay; limits on feedback explained.
10. Outcome	Findings; decision; action owners; deadlines; regulatory or safeguarding reports; recovery or control actions; lessons learned.
11. Feedback and review	Final feedback provided; confidentiality restrictions; review requested and outcome; retaliation follow-up.
12. Closure and assurance	Register updated; safeguarding cross-reference; Executive Board reporting category; retention date/review; actions verified complete.