



Whistleblowing Policy

December 2025

Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Organisation is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

This policy is entirely separate from the child protection responsibilities outlined in the Safeguarding policy.

Qualifying disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes 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.

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

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Organisation's grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

The Procedure

In the first instance you should report any concerns you may have to your Head of Department.

Where the concern relates to your Head of Department, or it is not appropriate to make the report to them, then you should report it to another equivalent senior Manager.

If you do not feel able to report your concerns to your Head of Department or an equivalent senior manager, you should refer to HR.

All concerns reported will be treated in the utmost confidence.

A response would normally be received within seven days of reporting the disclosure.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

This investigation must be completed as soon as reasonably practicable, and the employee will be kept informed with progress.

Once the investigation is complete, the investigation manager will write to the employee confirming the outcome.

If the employee is not satisfied with the explanation or outcome, they may raise the matter with a member of the Senior leadership Team.

The Board member manager will normally write to the employee confirming the outcome within seven days, unless further enquiries are required, and will update the employee.

External reporting

If your concerns have not been resolved through the internal procedures, they could be taken directly to the appropriate organisation or regulatory body with authority for

that area.

If an employee has any concerns they may approach on a confidential basis (if wished):

Protect, Speak Up, Stop Harm, the Whistleblowing charity at <https://protectadvice.org.uk/>

Formal Action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection against detrimental treatment

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

This Policy and Procedure does not form part of your contract of employment

Approval

Approved by; David Thorpe

Date; December 2025

Role; Designated Safeguarding Lead (DSL)

Review date; December 2026