Whistleblowing Policy

Valid From	Review Date	Approved By
01.11.2026	01.11.2027	Matt Ford & Shahed Koyes

Active Support Education Centre is a registered independent school supporting learners aged between 11 and 16 years old in Luton and Bedfordshire. We are committed to making it our mission to promote resilience and positive wellbeing for all our pupils and staff. We understand Wellbeing as state of being comfortable, healthy and happy. We will drive the message forward, to ensure that mental health is 'everyone's business' across the whole school community.

We will strive to create an environment that has a whole school approach, in providing excellent mental health support, understanding and intervention. We will put Wellbeing at the heart of our school to ensure successful learning and commit to our policies reflecting this.

1. Aims

1.1 Active Support Education Centre is committed to the highest possible standards of openness and accountability. This policy provides a means for anyone associated with the school who has serious concerns about any aspects of practice to come forward and voice those concerns, irrespective of seniority or status without fear of reprisal. Furthermore, to enable those who wish to raise serious concerns to be able to do so in a way that will not be seen as being disloyal to their colleagues or to the school.

1.2 This policy makes it clear that 'whistleblowers' can raise concerns that are in the public interest without fear of victimisation, or subsequent discrimination or disadvantage. The aim is to encourage and enable employees to raise serious concerns within Active Support rather than overlooking the problem or reporting the matter externally. This policy ensures that the school complies with its duty under the Public Interest Disclosure Act 1998.

2. Objectives

2.1 The Whistleblowing Policy should be used to raise serious concerns that fall outside the scope of other procedures, or where employees may lack the confidence or be too fearful to use these procedures.

2.2 This policy should not be used for conduct which can be dealt with through the school's normal procedures, for example employee grievances or complaints. Wherever possible, issues such as these should be resolved through the usual management channels by discussion and open dialogue.

2.3 This policy is in addition to the school's complaints procedures and other specifically laid down statutory reporting procedures such as referrals to the Disclosure and Barring Service or Teacher Regulation Agency.

2.4 For the purpose of this policy, the term 'employee' will include all employees of the school. It also applies to contractors working on the premises.

2.5 This policy aims to:

- encourage employees to feel confident in coming forward with serious allegations;
- provide a means for employees to make serious allegations and receive feedback on any action taken;
- ensure confidentiality if required;

- reassure employees that they will be protected from possible reprisals or victimisation;
- reassure employees that they will suffer no detriment or disadvantage from making allegations as long as they do so in public interest, genuinely believing their allegations to be valid.

2.6 Examples of serious concerns that may be reported under the Whistleblowing policy may include:

- Fraudulent or improper use of the school's money or assets
- Breach of Health and Safety Policy or practice including dangerous practices at work
- Breach of Child Protection Policy/legislation
- Criminal Activity
- Alleged miscarriage of justice
- Unethical Conduct
- Abuse of Authority
- Failure to comply with legal obligations
- Maladministration, misconduct or malpractice
- Damage to the environment
- Concealment of any of the above

These are examples; the list is not exhaustive.

2.7 Should employees wish to seek other independent advice in relation to whistleblowing, advice can be sought from their Trade Union Representative or the whistleblowing charity 'Protect' https://protect-advice.org.uk/ provides further advice and information.

3. Safeguards

3.1 The school recognises that the decision to raise a serious concern can be a difficult one to make. However, employees who raise serious concerns that are in the public interest will have nothing to fear because they are doing their duty to the employer and those for whom you are providing a service.

3.2 The school will not tolerate any harassment or victimisation (including informal pressure) and will take appropriate action to protect an employee who raises a concern in good faith.

3.3 Any investigation into allegations of potential malpractice will not influence or be influenced by any employment procedures (e.g. disciplinary) that may already affect the employee, if they are an employee.

4. Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal an employee's identity if they so wish. However, if the matter is subsequently dealt with through the School procedures, e.g. the Disciplinary Procedure, the employee may need to come forward as a witness if the matter is to be dealt with effectively.

5. Anonymous Allegations

5.1 This procedure encourages people to put their name to an allegation whenever possible.

5.2 Concerns expressed anonymously are much less powerful but will be considered at the discretion of the School.

5.3 In exercising this discretion, the factors to be considered would include:

- The seriousness of the issues raised;

- The credibility of the allegation;
- The likelihood of confirming the allegation from attributable sources and information.

6. How to raise a concern internally

6.1 As a first step, the employee should normally raise concerns with their immediate line manager. This, however, may depend on the seriousness and sensitivity of the issues involved and who is suspected of any malpractice. If the employee believes their line manager is involved, they should approach the Headteacher or Chair of Governors or the HR or Wellbeing manager.

6.2 Should an employee feel unable to approach the Headteacher or Chair of Governors, they should contact the HR or Wellbeing manager, or obtain advice from the Whistleblowing Advice line – 0800 028 0285.

6.3 Concerns may be raised verbally or in writing, however they are better raised in writing. Whether a written or verbal report is made, the employee should make it clear that they are raising the issue via the whistleblowing policy and it is important that the following information is provided:

- The name of the employee making the allegation and a contact point. As referred to above, it will be more difficult for the School to pursue issues if concerns have been expressed anonymously;
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The particular reason for the allegation and concern.

7. How to raise a concern externally

7.1 This policy aims to provide employees with a means to raise serious concerns within the School. Should an employee be unsatisfied with action taken by the School, they may feel it is right to raise the matter externally, in which case there are the following contact points:

- The Education & Skills Funding Agency
- The Department for Education
- The Police
- A relevant voluntary organisation
- Recognised Trade Union

7.2 If an employee does decide to raise the matter externally, they should ensure that they do not disclose confidential information or that disclosure would be privileged. Whistleblowers are encouraged to approach the Charity, “Protect” before reporting a concern to any external bodies or individuals (see 2.7 above for contact details).

7.3 Concerns about safeguarding practices can be raised externally using the NSPCC whistleblowing helpline – 0800 028 0285.

8. How the School will respond

8.1 The School will respond in every case to an allegation made under this procedure. Any manager receiving a complaint under this procedure must contact the Headteacher to inform them of this and to seek advice on the appropriate steps.

8.2 Initial enquiries may be made to assess whether further investigation is appropriate and if so, by whom and what form it should take. Concerns or allegations that fall within the scope of specific areas, for example child protection or discrimination will normally be referred for consideration under

the appropriate procedure; advice may be sought from the HR Manager. Where appropriate, the matters of concern may have to be referred to the police and external auditors.

8.3 Within 10 working days of an allegation being made, the School will write to the employee who raised the concern (unless they have requested not to be contacted or to be contacted in a different way, other than by letter), acknowledging that the allegation has been received and advising the employee of the next steps.

8.4 If an investigation is the appropriate course of action, the School will appoint a suitable investigator at the earliest available opportunity. Subject to the seriousness and nature of the disclosure, this may be an appropriate member of School staff, a governor, School or an external party.

8.5 Once the School has appointed an investigator, they will be required to contact the employee at the earliest available opportunity, and in any event, no later than 10 working days from the date of their appointment.

8.6 Where the allegation has been made internally and anonymously, the School will be unable to communicate what action has been taken.

8.7 If subsequently any disciplinary action is required, the School will seek support from the School's HR Team.

8.8 The amount of contact necessary between the investigating officer and the employee raising the concern will depend upon the nature of the matters raised, the potential difficulties involved and the clarity of the information provided.

8.9 Where any meetings are arranged with the employee, the employee has the right to be accompanied by a trade union representative or workplace colleague.

8.10 The School will take steps to minimise any difficulties which the employee may experience as a result of raising a concern, for example if the employee is required to provide evidence in a criminal or disciplinary proceeding, the School will arrange for support to be given about such proceedings.

8.11 The School accepts that employees need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, those making allegations will be informed of the outcome of any investigation in writing.

9. Untrue and Vexatious Allegations

If an employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an employee makes an allegation maliciously, frivolously or for personal gain, disciplinary action may be taken against the employee.

10. Monitoring and Evaluation

The Headteachers and Governors of the school are responsible for ensuring that this policy is reviewed annually.