

EquiScholars HQ Whistleblowing Policy

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Review Cycle	Annually or sooner if updated guidance requires
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Reviewed By	Kate Blackmore

Introduction

EquiScholars HQ is committed to operating with openness, honesty, and integrity.

We expect all members of our community to maintain high standards and to report any concerns about wrongdoing, unlawful behaviour or poor practice in line with this policy.

This policy explains:

- What constitutes whistleblowing.
- How to raise a concern.
- What legal protections are available to whistleblowers.
- How EquiScholars HQ will respond to concerns raised.

This policy is in line with the:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996 (as amended)
- Whistleblowing in Schools and Colleges – Protecting Staff Who Report Wrongdoing (DfE, 2023)
- Keeping Children Safe in Education (DfE, 2024)

All alternative provisions must have appropriate procedures in place for whistleblowing and all staff must know how to report concerns.

Policy Statement

EquiScholars HQ is committed to the highest possible standards of:

- Openness and inclusivity
- Accountability and transparency
- Integrity and professional responsibility

We encourage staff to raise genuine concerns at the earliest opportunity, in the knowledge that they will be taken seriously, treated sensitively, and investigated appropriately.

We will ensure that anyone raising a concern in good faith will not suffer harassment, retaliation, or disadvantage as a result.

Purpose and Scope

This policy applies to all individuals working for or on behalf of EquiScholars HQ, including:

- Employees

Whistleblowing refers to raising a concern about wrongdoing that is in the public interest — meaning it affects others (for example, children, colleagues, or the wider community).

Concerns relating solely to an individual's employment should be addressed through the Grievance Procedure, unless the concern is believed to be in the public interest.

Our Commitment to Psychological Safety

As a Polyvagal-informed, Thrive-aligned, trauma-aware organisation, EquiScholars HQ is committed to maintaining psychological and relational safety within our team.

We recognise that raising concerns can be emotionally challenging. All reports will be managed with empathy, fairness, and respect, ensuring both the whistleblower and any individual subject to allegations are supported appropriately.

What Can Be Reported

Examples of whistleblowing concerns include, but are not limited to:

- Criminal activity or suspected criminal activity.
- Failure to comply with a legal obligation.
- Safeguarding or child protection failures.
- Neglect, abuse, or risk of harm to children or vulnerable adults.
- Health and safety risks.
- Misuse of public funds or financial irregularities.
- Corruption, fraud, or unethical behaviour.
- Discrimination or harassment.
- Attempts to conceal any of the above.

Concerns can relate to incidents that have occurred, are currently happening, or are likely to happen in the future.

Legal Protection for Whistleblowers

Whistleblowers are protected by law from unfair treatment or dismissal under the Public Interest Disclosure Act 1998.

To qualify for protection, the whistleblower must:

- Have a reasonable belief that the concern is true and in the public interest.
- Raise the concern through the appropriate channels as set out in this policy.

No employee will be victimised or penalised for raising a concern in good faith, even if the concern is later found to be unfounded.

Confidentiality and Anonymity

- Concerns can be raised anonymously, but this may limit the ability to investigate the issue fully.
- Where a name is provided, confidentiality will be maintained wherever possible.
- The identity of the whistleblower will only be shared with those who need it to progress the investigation or where required by law.

How to Raise a Concern

Concerns can be raised verbally or in writing.

Staff should provide as much detail as possible, including:

- What has occurred (or is believed to have occurred).
- When and where the incident took place.
- Who was involved.
- Any evidence or supporting information available.

Concerns should normally be raised with one of the following:

- Your Line Manager
- Claire Cottrell, Head of Therapeutic Programmes & Designated Safeguarding Lead
- Kate Blackmore, Centre Manager

If your concern involves the Director, or you feel unable to raise it internally, you may contact the:

Local Authority Designated Officer (LADO)

Somerset LADO Service

Email: lado@somerset.gov.uk

Telephone: 0300 123 2224 (Option 3)

Step-by-Step Procedure

Step 1 – Acknowledgement

Your concern will be acknowledged in writing within 5 working days, and you will be informed how it will be managed.

Step 2 – Initial Review

An initial review will determine whether an investigation is required.

This may involve consultation with the DSL, Director, or an external professional (e.g. safeguarding consultant or HR advisor).

Step 3 – Investigation

Where an investigation is appropriate, it may be carried out by:

- The Director or Senior Management Team.
- The Local Authority or LADO.
- The Police or an external independent investigator.

You may be asked to provide a written statement or further information.

Step 4 – Outcome

You will be informed of the outcome of the investigation in writing, subject to confidentiality and data protection laws.

Possible outcomes may include disciplinary action, referral to an external body or no further action if concerns are not substantiated.

If you believe your concern has not been addressed appropriately, you may escalate it to an external organisation (see Section 10).

External Reporting Options

If internal processes have been exhausted or you believe it is not appropriate to raise your concern internally, you may contact one of the following bodies:

- Ofsted: www.gov.uk/contact-ofsted
- Public Concern at Work (Protect): 020 3117 2520 | www.protect-advice.org.uk
- Local Authority Designated Officer (LADO)
- The Police
- The Local Government Ombudsman
- The Equality and Human Rights Commission

Disclosing information to the media is not generally protected under whistleblowing law and may jeopardise your legal rights.

Harassment or Victimisation

EquiScholars HQ will not tolerate harassment or victimisation of anyone who raises a concern in good faith.

Any employee who attempts to intimidate, threaten, or retaliate against a whistleblower will face disciplinary action.

We recognise that whistleblowing can be distressing; therefore, we will provide access to appropriate support, including reflective supervision and mentoring.

False or Malicious Allegations

If a concern is raised in good faith but not substantiated, no action will be taken against the whistleblower.

However, deliberately false or malicious allegations made for personal gain or to cause harm may result in disciplinary action.

Monitoring and Review

- The Centre Manager is responsible for ensuring that all concerns raised under this policy are recorded, monitored, and resolved in a timely manner.
- A confidential Whistleblowing Log will be maintained and reviewed annually to identify themes and improve practice.
- This policy will be reviewed annually by the Centre Manager and Senior Management Team or sooner if new legislation or guidance arises.

Related Policies and Guidance

- Safeguarding and Child Protection Policy
- Behaviour and Regulation Policy
- Equality, Diversity and Inclusion Policy
- Staff Code of Conduct
- Complaints Policy
- Grievance Policy
- Keeping Children Safe in Education (2024)
- Guidance for Safer Working Practice (2024)