

Whistleblowing Policy

September 2026

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Introduction

AS2Educate is committed to maintaining the highest standards of integrity, openness, accountability and safeguarding. We encourage all staff and those working on behalf of the Provision to speak up promptly where they have concerns that wrongdoing, poor practice, unsafe practice or failures in safeguarding may be placing children, colleagues or the organisation at risk.

Creating a culture where people feel safe to speak up is an essential part of safeguarding. Everyone working at AS2Educate has a responsibility to raise concerns where they believe a child, colleague, member of staff or the organisation may be at risk. Concerns will always be listened to, taken seriously and responded to appropriately.

AS2Educate is committed to ensuring that no person suffers disadvantage, victimisation, harassment or retaliation because they have raised a genuine concern in the public interest.

AS2Educate promotes a culture of professional curiosity, respectful challenge and shared responsibility, recognising that safeguarding is everyone's responsibility and that no concern is too small to report.

This Whistleblowing Policy (Confidential Reporting Code) provides a confidential process for reporting concerns about malpractice, safeguarding failures or wrongdoing that cannot appropriately be addressed through normal management arrangements.

This Policy applies to:

- employees
- agency workers
- volunteers
- governors/directors
- contractors
- consultants
- students on placement
- apprentices
- work experience students
- anyone working on behalf of AS2Educate.

This Policy should be read alongside:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Grievance Policy
- Complaints Policy
- Equality, Diversity and Inclusion Policy

This Policy reflects the requirements of:

- Public Interest Disclosure Act 1998
- Enterprise and Regulatory Reform Act 2013
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026

- DfE Whistleblowing Advice for Schools

Aims and Scope of the Policy

The aims of this Policy are to:

- create a culture where speaking up is encouraged and valued
- ensure safeguarding concerns are raised immediately
- provide clear reporting routes
- ensure concerns are investigated fairly and promptly
- protect those raising concerns from victimisation
- promote transparency, accountability and continuous improvement.
- promote a positive Speak Up culture where concerns are welcomed as opportunities to improve safeguarding and organisational practice.

This Policy may be used where concerns relate to, for example:

- safeguarding failures
- abuse or neglect of a child
- failures to follow safeguarding procedures
- unsafe recruitment practice
- serious breaches of statutory guidance
- criminal offences
- fraud, theft or financial irregularity
- corruption or bribery
- health and safety failures
- discrimination or victimisation
- abuse of authority
- deliberate concealment of wrongdoing
- misuse of public funds
- serious misconduct
- risks to children's welfare
- repeated breaches of professional standards.

Whistleblowing concerns may relate to employees, leaders, volunteers, governors/directors, contractors, external professionals or anyone working on behalf of AS2Educate.

This Policy is not intended to replace:

- the Grievance Procedure
- disciplinary procedures
- complaints procedures
- allegations against staff procedures
- safeguarding referral procedures.

Where a concern involves safeguarding, the safeguarding procedures take precedence.

Raising a Concern

Where a concern relates to the safety or welfare of a child, staff must immediately report the concern in person to the Designated Safeguarding Lead (DSL), Deputy DSL or Provision

Manager. The Whistleblowing Report Form and email process are intended to create an audit trail and must never delay safeguarding action.

Following the initial discussion, the concern should be recorded using the AS2Educate Whistleblowing Report Form, which is available on the Staff Google Drive.

The completed form should then be emailed to safeguarding@as2educate.co.uk as soon as reasonably practicable to ensure there is a secure written record of the concern.

Staff should not save completed Whistleblowing Report Forms on the shared Staff Google Drive, as this could compromise confidentiality. Completed forms should be saved securely within the individual's own secure drive until they have been submitted by email.

If a member of staff is unsure how to complete the form, or feels unable to do so, they should simply email their concern to safeguarding@as2educate.co.uk, providing as much relevant information as possible, or complete the form by hand and hand deliver to the person they reported the concern to. A concern should never be delayed because a form has not been completed.

Where the concern relates to the Designated Safeguarding Lead or the Provision Manager, staff should raise the matter directly with another member of the Senior Leadership Team in the first instance.

Following the discussion, the completed Whistleblowing Report Form should be emailed directly to that member of the Senior Leadership Team or hand delivered, rather than to the safeguarding email address, to ensure the concern is managed independently and confidentially.

If a member of staff feels unable to raise the concern internally, or believes the concern has not been addressed appropriately, they may contact an appropriate external body, including:

- the Local Authority Designated Officer (LADO) for Hertfordshire County Council or Central Bedfordshire County Council
- Children's Social Care
- the relevant Safeguarding Partnership
- Ofsted
- the NSPCC Whistleblowing Advice Line
- the Health and Safety Executive
- the Police (where a criminal offence may have occurred)

Concerns may be raised verbally or in writing. Where possible, staff should include:

- what happened;
- the date, time and location of the incident(s);
- the names of those involved;
- any witnesses;
- any supporting evidence available; and
- why they believe the matter requires investigation.

Individuals are not expected to prove that wrongdoing has occurred. They only need a reasonable belief, based on the information available to them, that the concern is true and that making the disclosure is in the public interest.

Staff may seek confidential advice from their trade union, professional association, legal adviser or the NSPCC Whistleblowing Advice Line before making a disclosure.

Where a concern relates to the immediate safety or welfare of a child, safeguarding procedures must not be delayed whilst completing documentation. Staff should report the concern immediately to the DSL (or deputy DSL), or if necessary, contact Children's Social Care or the Police, in accordance with the Safeguarding and Child Protection Policy.

How AS2Educate will Respond

All concerns will be:

- acknowledged promptly
- assessed objectively
- treated seriously
- investigated proportionately
- recorded appropriately.

Where necessary, immediate action may include:

- safeguarding referrals
- referral to Children's Social Care
- referral to the LADO
- contacting the Police
- suspension of individuals where appropriate
- implementation of immediate protective measures.

Where appropriate, within ten working days the whistleblower will normally receive:

- acknowledgement that the concern has been received
- information about how it will be handled
- expected timescales
- details of available support.

The whistleblower will be kept informed where appropriate, although confidentiality and data protection requirements may limit the information that can be shared.

Learning arising from whistleblowing investigations will be used to strengthen safeguarding arrangements, improve organisational practice and reduce future risk.

Escalating Concerns Further

Where a whistleblower believes concerns have not been addressed appropriately, concerns may be raised with prescribed external bodies including:

- Ofsted
- the Department for Education
- Local Authority Children's Services

- the LADO
- the Police
- the Health and Safety Executive
- the Information Commissioner's Office
- the Charity Commission (where applicable)
- the NSPCC Whistleblowing Advice Line.

Before disclosing confidential information externally, staff should seek appropriate advice unless immediate disclosure is necessary to protect a child from harm.

Nothing within this Policy prevents an individual from making a protected disclosure under the Public Interest Disclosure Act.

Anonymous Allegations

Anonymous disclosures will be considered on their merits.

The decision to investigate anonymously will take account of:

- seriousness of the allegation
- credibility
- available evidence
- safeguarding risk
- likelihood of obtaining further evidence.

Protection from Harassment and Victimisation

AS2Educate will not tolerate any form of:

- victimisation
- harassment
- intimidation
- discrimination
- detrimental treatment
- retaliation against anyone who raises a genuine concern.

Any employee who victimises a whistleblower may be subject to disciplinary action, which could include dismissal.

Support will be made available where appropriate, recognising that raising concerns can be stressful and emotionally demanding.

Confidentiality

All concerns and disclosures will be treated in confidence, and your identity will be protected wherever possible. However, disclosure may be required for legal or investigatory reasons.

Information will only be shared where necessary:

- to safeguard children
- to investigate concerns
- to comply with legal obligations

- where required by regulatory authorities

Whistleblowing records will be stored securely, with access restricted to those who need the information to fulfil their safeguarding or governance responsibilities and retained in accordance with AS2Educate's Data Protection and Records Retention Policy.

Malicious or Knowingly False Allegations

AS2Educate encourages staff to raise genuine concerns, even where those concerns are not ultimately substantiated following investigation.

No action will be taken against an individual who raises a concern honestly and in good faith, even if the concern proves to be mistaken.

However, any person who knowingly makes a false allegation, acts maliciously, deliberately provides false information or raises concerns for personal gain may be subject to disciplinary action and, where appropriate, legal action.

Leadership Responsibilities

The Provision Manager has overall responsibility for implementing this Policy and ensuring appropriate arrangements are in place to receive, investigate and respond to whistleblowing concerns.

The Directors are responsible for ensuring that:

- a positive speak-up culture is maintained
- staff understand how to raise concerns
- concerns are investigated fairly and independently
- lessons learned are acted upon
- whistleblowers are protected from detriment.

All leaders are expected to promote an open, transparent and psychologically safe culture where concerns are welcomed and viewed as opportunities to strengthen safeguarding and improve practice.

Monitoring and Review

The Provision Manager and Directors will monitor the implementation of this Policy, including:

- the number and nature of whistleblowing concerns
- themes and trends
- safeguarding implications
- outcomes of investigations
- actions taken
- safeguarding themes
- organisational learning
- whether improvements have been embedded.

Where appropriate, findings from whistleblowing investigations will inform:

- policy development

- staff training
- safeguarding practice
- quality assurance
- organisational learning.

This Policy will be reviewed annually or sooner where there are changes to legislation, statutory guidance or organisational practice.

AS2Educate recognises that effective whistleblowing arrangements are a fundamental safeguarding responsibility. Creating a culture where staff feel safe to speak up, professionally challenge poor practice and report concerns without fear helps protect children, supports staff wellbeing and promotes continual improvement across the Provision.

AS2Educate Whistleblowing Report Form
Confidential

This form should be completed following an initial discussion with the Designated Safeguarding Lead (DSL) or Provision Manager.

If your concern relates to the DSL or Provision Manager, speak to another member of the Senior Leadership Team and email the completed form directly to them.

Please do not save completed forms on the shared Staff Google Drive. Save the completed form securely within your own drive and email it immediately after completion.

Email: safeguarding@as2educate.co.uk

If you are unable to complete this form, please email your concern instead or print and hand write this form. A concern should never be delayed because this form has not been completed.

Whistleblower Details

Name	
Job title / role	
Date	
Preferred contact details	

Have you already discussed this concern?

☐ Yes ☐ No

If yes:

Who did you speak to?

Date

Details of your Concern

Please describe your concern as fully as possible.

Include:

- what happened
- where it happened
- when it happened
- who was involved

- who witnessed the incident
- why you are concerned

Who does your concern relate to?

Tick all that apply.

Student	Visitor
Member of staff	Senior Leader
Volunteer	Director
Contractor	Other
Parent/carer	

Please provide names if known:

Type of Concern

Tick all that apply.

Safeguarding concern	Fraud
Child protection concern	Abuse of position
Poor professional practice	Bullying or harassment
Unsafe practice	Discrimination
Health and safety	Breach of statutory guidance
Financial irregularity	Failure to follow safeguarding procedures
Criminal offence	

Other:

Please specify.

Is there an immediate risk?

Do you believe anyone is currently at immediate risk of harm?

☐ Yes ☐ No

If yes, please explain.

Evidence

Please list any documents, emails, photographs, screenshots or other evidence that may assist.

Have you reported this elsewhere?

☐ No ☐ Yes

If yes, who have you informed?

DSL	Ofsted
Provision Manager	NSPCC
Senior Leadership Team	Children's Social Care
Police	LADO
Other	
Please provide details:	

Declaration

I confirm that:

☐ I believe the information contained within this report is true to the best of my knowledge.

- ☐ I am raising this concern because I believe it is in the public interest.
- ☐ I understand that deliberately false or malicious allegations may result in disciplinary action.

Signature

Name

Date

Remember:

- If a child is at immediate risk of harm, follow the Safeguarding and Child Protection Policy immediately. Do not wait to complete this form.
- Do not save this completed form on the shared Staff Google Drive. Save it securely within your own drive and email it to safeguarding@as2educate.co.uk (or directly to the relevant Senior Leadership Team member where the concern relates to the DSL or Provision Manager).
- All concerns will be treated confidentially and managed in accordance with the AS2Educate Whistleblowing Policy.



For Senior Leadership Team Use Only

Date concern received

Received by

Method received

- ☐ In person
- ☐ Email
- ☐ Telephone
- ☐ Other

Reference Number:

Safeguarding concern?

- ☐ Yes
- ☐ No

Immediate action taken

- ☐ DSL informed
- ☐ Children's Social Care
- ☐ Police
- ☐ LADO
- ☐ Medical assistance
- ☐ Internal investigation
- ☐ Other

Details

Lead Investigator

Outcome

Date closed

Signed

Reviewed by:	Richard Fihosy and Claire Ames
Policy Commencement Date:	02.09.2021
Ratified by:	Provision Manager and DSL
Review:	Annual
Next Review:	Autumn Term 2027
Review Date 08.03.24 Richard Fihosy	Page and Sections Page 1 - Former Director's name was deleted.
Aug 25	Full Policy Review