OP 10 – WHISTLE BLOWING POLICY

RISE Learning Zone.
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Reason	Amendment Details	Author	Date
1st Issue	Updated policy	Kirsty Sanders	
2nd	Updated policy with clear communication channels	Kirsty Sanders	09.2026

Full Policy Sign Off

Signed 

Printed Kirsty Sander

Position Director

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WHISTLEBLOWING POLICY AND PROCEDURE

1. Purpose

Rise Learning Zone CIC ("Rise") is committed to the highest standards of openness, integrity, accountability and safeguarding.

This policy provides a clear procedure through which workers can raise genuine concerns about suspected wrongdoing or malpractice in the public interest without fear of victimisation, disadvantage or reprisal.

The Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation, provides legal protection to workers who make certain qualifying disclosures ("protected disclosures"). Current government guidance confirms that a worker must reasonably believe that the disclosure concerns a specified type of wrongdoing, is in the public interest and is made through an appropriate channel. (GOV.UK)

Rise encourages concerns to be raised at the earliest opportunity so that they can be considered and addressed appropriately.

2. Scope

This policy applies to employees, workers, agency workers, trainees and other individuals working for or on behalf of Rise where applicable.

Volunteers and contractors are also encouraged to use this procedure to raise concerns, although their statutory protection under whistleblowing legislation may differ according to their employment status.

This policy applies irrespective of the position or seniority of the person who is the subject of the concern. A concern may therefore be raised about any member of staff, manager, the DSL/DDSL, Programme Manager, an individual Director, more than one Director, or the entire Board of Directors.

No individual within Rise is exempt from scrutiny under this policy.

3. What is whistleblowing?

Whistleblowing is the disclosure of information which a worker reasonably believes shows wrongdoing and which they reasonably believe is in the public interest.

Qualifying wrongdoing can include:

- a criminal offence, including fraud, theft, bribery or corruption
- failure to comply with a legal obligation
- a miscarriage of justice
- danger to the health or safety of an individual
- damage to the environment
- sexual harassment
- deliberate concealment of information concerning any of the above. (GOV.UK)

In an education and safeguarding context, concerns may also involve serious or systemic failures in safeguarding practice, deliberate failures to follow statutory safeguarding requirements, concealment of safeguarding failures or other wrongdoing affecting the safety or welfare of children.

The person raising the concern does **not** need to investigate the matter themselves or prove that wrongdoing has occurred. They should have reasonable grounds for their concern and provide the information available to them. Government guidance specifically recommends making clear that whistleblowers do not need to provide evidence before an employer investigates a concern. (GOV.UK)

4. What is not normally whistleblowing?

A personal complaint relating solely to an individual's own employment, for example, their terms and conditions, interpersonal disagreement or treatment at work, will normally be dealt with under Rise's Grievance Procedure rather than this policy.

However, the fact that an issue also affects the person raising it does not automatically prevent it from being whistleblowing if they reasonably believe that the disclosure is in the public interest.

Safeguarding concerns about an individual child, or allegations that an adult working with children has harmed a child or may pose a risk of harm, must be acted upon immediately in accordance with Rise's Safeguarding and Child Protection Policy and relevant statutory procedures. A safeguarding matter may also amount to a protected disclosure depending upon the circumstances.

5. Who should a concern be reported to?

Rise wants there to be a clear reporting route regardless of who the concern is about.

The person raising the concern is not required to report it to somebody who is implicated in the concern.

Concern relates to	Who to report to
Employee, worker, volunteer, contractor or other member of staff	Line Manager, Programme Manager or a Director
Line Manager or Programme Manager	A Director
DSL/DDSL or safeguarding practice	A Director who is not implicated, alongside the procedures within the Safeguarding and Child Protection Policy
One Director	Another Director who is not implicated in the concern
Two or more Directors	A Director who is not implicated, where one is available
All Directors / entire Board	An appropriate external prescribed person/body, regulator or other statutory agency according to the nature of the concern. Independent advice may also be sought from Protect.
A concern where the worker reasonably believes it cannot appropriately or safely be raised internally	An appropriate prescribed person/body or relevant statutory agency according to the nature of the concern
Immediate risk to a child	Follow the Safeguarding and Child Protection Policy immediately, including referral to children's social care/police where required
Concern about safeguarding practice which the worker feels unable to raise internally	NSPCC Whistleblowing Advice Line – 0800 028 0285

This replaces the less-specific reporting arrangements in the existing policy.

Workers are not required to raise a concern internally before approaching an appropriate prescribed person where the statutory requirements for an external protected disclosure are met. The Government maintains the current list of prescribed persons and bodies and their respective remits. (GOV.UK)

GOV.UK – current list of prescribed persons and bodies

6. Safeguarding whistleblowing

Rise recognises the particular importance of whistleblowing within an organisation working with children and young people.

All staff have a responsibility to raise concerns about poor or unsafe safeguarding practice and potential failures in Rise's safeguarding arrangements.

KCSIE 2026 specifically addresses whistleblowing and provides an external route through the NSPCC Whistleblowing Advice Line where staff feel unable to raise concerns about safeguarding practice internally. (GOV.UK)

Where a concern relates to the conduct of a member of staff or Director towards a child, Rise's Safeguarding and Child Protection Policy and procedures for managing allegations/low-level concerns must also be followed as applicable. This may include referral to the Local Authority Designated Officer (LADO).

Nothing in this policy prevents an individual from making an appropriate safeguarding referral directly where a child is at risk.

7. How to raise a concern

Concerns may be raised verbally or in writing. A worker should make clear that they are raising a concern under the Whistleblowing Policy.

Where possible, the disclosure should include:

- the nature of the concern
- relevant dates, locations and people involved
- how and when the person became aware of the matter
- any available supporting information
- whether the concern has previously been raised and, if so, with whom
- any immediate risks which the person believes need to be addressed.

A worker is not expected to investigate the matter themselves.

8. Anonymous disclosures and confidentiality

A concern may be raised anonymously. Rise will consider anonymous disclosures seriously, although anonymity can make it more difficult to investigate the concern or obtain further information.

Where an individual provides their identity but asks for confidentiality, Rise will take reasonable steps to protect their identity. It cannot guarantee absolute confidentiality where disclosure becomes necessary for legal, safeguarding, regulatory or procedural reasons.

The individual will be informed wherever reasonably possible if their identity needs to be disclosed.

Current government guidance expressly recognises anonymous reporting and recommends that policies explain both its availability and the potential limitations it creates for investigation and feedback. (GOV.UK)

9. Protection from detriment

Rise will not tolerate victimisation, harassment, intimidation or any other detrimental treatment of a person because they have raised a genuine whistleblowing concern.

Workers making a protected disclosure have statutory protection against detriment and, for employees, dismissal because they have made a protected disclosure. (GOV.UK)

Any employee who victimises, threatens or attempts to deter another person from raising a legitimate concern may be subject to disciplinary action.

10. Responding to a concern

Where reasonably practicable, Rise will acknowledge a formal whistleblowing concern within 10 working days.

The acknowledgement should explain, as far as reasonably possible:

- how the matter will be considered
- whether initial enquiries have been undertaken
- whether further investigation is proposed
- who will be responsible for handling the matter
- the anticipated timescale for the next update.

Depending upon the nature of the concern, Rise may arrange:

- an internal investigation
- investigation by an appropriately independent person
- referral to the Safeguarding and Child Protection Procedure
- referral to the LADO or children's social care
- referral to the police
- referral to a regulator, commissioning authority or other external body
- another appropriate procedure.

Where the concern involves a Director, that Director must not oversee, control or influence the investigation.

Where independence cannot reasonably be achieved internally, Rise should appoint a suitably independent external person or refer the matter to the appropriate external authority.

This builds on the investigation process already contained within OP10.

11. Feedback and outcome

Rise will keep the whistleblower appropriately informed about progress.

Where reasonably possible, the person raising the concern will be told whether the matter has been concluded. However, Rise may not be able to provide detailed information about disciplinary action, confidential safeguarding matters, personal information relating to another person or matters restricted by law.

12. Unsubstantiated concerns

A worker will not be penalised simply because a concern they reasonably believed to be genuine subsequently proves to be mistaken or unsubstantiated.

Appropriate action may, however, be considered where it is established that a person has knowingly made a deliberately false or malicious allegation.

13. Taking a concern outside Rise

Rise encourages workers to obtain independent advice if they are uncertain about how to raise a concern.

Protect is an independent whistleblowing charity providing confidential advice. Protect – whistleblowing advice

Workers may also seek advice from a trade union, legal adviser or Acas.

A worker may make a disclosure to an appropriate prescribed person or body. The correct body will depend upon the subject of the disclosure. The statutory conditions applying to external disclosures differ from disclosures made directly to an employer, so workers may wish to obtain independent advice. (GOV.UK)

14. Record keeping and conflicts of interest

Whistleblowing disclosures and their outcomes will be recorded securely and access restricted to those who require the information.

Where a disclosure concerns a Director, that Director will not be responsible for maintaining or controlling the record of that disclosure.

Where the disclosure concerns all Directors, records relating to the matter should be retained separately and securely by the person or independent professional appointed to handle the matter, where applicable.

Records involving safeguarding concerns will also be maintained in accordance with Rise's safeguarding record-keeping procedures.

15. Monitoring and review

The Directors will periodically review the effectiveness of Rise's whistleblowing arrangements.

Any Director who is personally implicated in a whistleblowing matter will be excluded from consideration, investigation and decision-making relating to that matter.

The policy will be reviewed at least every two years and sooner where there are changes to legislation, statutory safeguarding guidance, organisational arrangements or learning arising from a whistleblowing case.