



## **Whistleblowing Policy: Swallow Grange Alternative Provision**

**Organisation: Swallow Grange Alternative Provision – The Grange, Caistor Road, Swallow, Market Rasen, Lincolnshire LN7 6DP Age Group Supported: 4-11 year olds Specific Needs Supported: Special Educational Needs and Disabilities (SEND) / Social, Emotional and Mental Health (SEMH) Policy Version: 1.0 Effective Date: 8th July 2025 Review Date: 8th July 2026 (Annually, or sooner if there are significant changes)**

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### **1. Introduction**

**Swallow Grange Alternative Provision is committed to providing a safe, supportive, and ethical environment for its pupils, staff, and all members of its community. We recognise that staff are often the first to identify concerns about malpractice or wrongdoing. This Whistleblowing Policy aims to encourage and enable all individuals to raise genuine concerns internally, at a high level, without fear of reprisal, and to ensure that such concerns are properly investigated and appropriate action is taken.**

**This policy applies to all employees, volunteers, contractors, and anyone working on behalf of Swallow Grange Alternative Provision. It is intended to cover serious concerns that fall outside the scope of the Grievance Policy (which addresses personal complaints related to an individual's employment) or the Safeguarding Policy (which specifically addresses concerns about the welfare of children).**

### **2. Aims of this Policy**

- To encourage individuals to feel confident in raising serious concerns internally.**
- To provide avenues for individuals to raise concerns and receive feedback on any action taken.**
- To ensure that individuals receive protection from reprisal or victimisation for whistleblowing in good faith.**
- To reassure individuals that concerns will be taken seriously, investigated appropriately, and that the confidentiality of the whistleblower will be respected where possible and appropriate.**

- . To help develop a culture of openness, accountability, and integrity within Swallow Grange.

### **3. What is Whistleblowing? (Protected Disclosures)**

**Whistleblowing, or making a 'protected disclosure', is the disclosure of information which an individual reasonably believes tends to show one or more of the following by Swallow Grange Alternative Provision, or by another individual working within or in connection with it:**

- . **Criminal offences: e.g., fraud, theft, drug dealing.**
- . **Failure to comply with a legal obligation: e.g., breach of health and safety regulations, data protection laws (GDPR), equality legislation.**
- . **Miscarriages of justice: e.g., unsafe practices or decisions that could lead to harm.**
- . **Danger to the health and safety of any individual: This could include risks to pupils, staff, or visitors.**
- . **Damage to the environment: (Less likely in our context but applicable).**
- . **Breach of the Safeguarding Policy: While child protection concerns are primarily addressed through the Safeguarding Policy, persistent failures to follow safeguarding procedures could be a whistleblowing matter.**
- . **Deliberate concealment of any of the above.**
- . **Gross mismanagement or maladministration within the provision.**
- . **Abuse of authority.**
- . **Serious breach of financial regulations or corruption.**

**This policy is not for individual grievances relating to an employee's own employment. Such matters should be raised under the Grievance Policy. Safeguarding concerns relating directly to children should be raised immediately under the Safeguarding Policy.**

### **4. Safeguarding the Whistleblower (Protection)**

**Swallow Grange Alternative Provision is committed to protecting individuals who make disclosures in good faith under this policy.**

- . **No Victimisation: No individual will suffer any detriment, dismissal, or other unfavourable treatment as a result of making a protected disclosure. Any act of victimisation against a whistleblower will be treated as a serious disciplinary offence.**
- . **Confidentiality: Every effort will be made to protect the whistleblower's identity if they wish it to be kept confidential, unless disclosure is required by law (e.g., a court order) or is unavoidable for the purpose of the investigation (e.g., if the concern can only be investigated by revealing the source). In such cases, the whistleblower will be informed before their identity is revealed.**

- **False Allegations:** This policy is designed to protect individuals who raise genuine concerns in good faith. It does not protect individuals who make malicious, vexatious, or knowingly false allegations. Such actions may lead to disciplinary action.

## 5. How to Raise a Concern

We encourage individuals to raise concerns internally in the first instance, as this allows for prompt investigation and resolution.

### Stage 1: Internal Reporting

Concerns should ideally be raised with one of the following designated individuals:

1. **Head of Provision: [Name of Head of Provision]** ◦ Primary contact for most concerns.
2. **Chair of Governors/Trustees: [Name of Chair]** ◦ Contact if the concern involves the Head of Provision, or if the individual feels uncomfortable raising it with the Head of Provision.
3. **Designated Safeguarding Lead (DSL): [Name of DSL]** ◦ While child protection concerns are primarily safeguarding, persistent systemic failures in safeguarding may be appropriate for whistleblowing here.

When raising a concern, please provide as much information as possible, including:

- The nature of the concern and why you believe it to be true.
- The names of those involved (if any).
- Dates and times of incidents (if any).
- Any evidence or supporting documentation you may have.
- Your contact details (optional, but encouraged for follow-up).

Concerns can be raised verbally or in writing. Written concerns are preferred as they provide a clear record. If raising verbally, the recipient of the concern will make a clear and accurate record.

### Stage 2: External Reporting (Exceptional Circumstances)

While we encourage internal reporting, we recognise that there may be exceptional circumstances where an individual feels unable to raise a concern internally, or that their internal concerns have not been adequately addressed. In such rare cases, an individual may choose to raise their concern with an external body.

**External Prescribed Bodies:** A 'prescribed person' or body is an organisation designated by the government to receive whistleblowing disclosures relating to certain matters. Making a disclosure to a prescribed person can also offer legal protection. Relevant prescribed bodies for an alternative provision might include:

- **The Department for Education (DfE):** For concerns related to educational standards, governance, or the running of the provision.
- **Ofsted:** For concerns related to the quality of education, safeguarding, or leadership and management.
- **Local Authority (Children's Services/Social Care):** For serious safeguarding concerns that have not been adequately addressed internally.
- **Health and Safety Executive (HSE):** For serious health and safety breaches.
- **Information Commissioner's Office (ICO):** For serious breaches of data protection legislation.
- **Police:** For concerns about criminal activity.

**Legal Advice:** Individuals may also wish to seek independent legal advice before making an external disclosure.

## **6. The Process for Handling a Whistleblowing Concern**

1. **Acknowledgement:** The recipient of the concern (Head of Provision, Chair of Governors/Trustees, or DSL) will acknowledge receipt of the concern within 5 working days.
2. **Assessment:** An initial assessment will be made to determine if the concern falls under this Whistleblowing Policy, the Safeguarding Policy, or the Grievance Policy. If it falls under another policy, it will be signposted to the appropriate process.
3. **Investigation:** If the concern falls under this Whistleblowing Policy, a suitable individual or team (e.g., Head of Provision, Chair of Governors/Trustees, or an independent investigator if appropriate) will be appointed to investigate the matter thoroughly and impartially.
  - The investigation will be conducted sensitively and discreetly, with due regard for confidentiality.
  - The whistleblower may be asked to provide further information during the investigation.
  - Depending on the nature of the concern, external expertise (e.g., forensic auditors, legal advice) may be sought.
4. **Feedback:** The whistleblower will be informed of the outcome of the investigation, typically within 20 working days of the initial acknowledgement, or provided with an update if the investigation is ongoing. While the full details of any disciplinary action taken against

**others cannot be disclosed due to confidentiality, the whistleblower will be informed that the matter has been dealt with appropriately.**

**5. Action: Appropriate action will be taken based on the findings of the investigation. This could include:**

- Remedial action to address the identified issues.
- Changes to policies or procedures.
- Disciplinary action against individuals involved. ○ Referral to external authorities (e.g., Police, social services, regulatory bodies).

**6. Record Keeping: A confidential record of the concern, investigation, and outcome will be maintained, separate from personnel files.**

## **7. Review and Monitoring**

**This policy will be reviewed annually by the Head of Provision and the Governing**

**Body/Trustees to ensure its effectiveness, compliance with relevant legislation (e.g., Public Interest Disclosure Act 1998), and alignment with the values of Swallow Grange Alternative Provision.**

## **8. Support for Whistleblowers**

**We understand that raising a serious concern can be a difficult and stressful experience. Swallow Grange Alternative Provision will offer support to individuals who have made a genuine disclosure, including access to:**

- Confidential discussions with the Head of Provision or Chair of Governors/Trustees.
- Where appropriate, signposting to external support services.

## **9. Policy Communication**

**This policy will be made available to all staff, volunteers, and contractors working with Swallow Grange Alternative Provision. It will be included in induction processes and readily accessible on the provision's internal platforms.**

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**Signed: Jayne Chudley – Managing Director – 8<sup>th</sup> July 2025**  
**Reviewed 25<sup>th</sup> June 2026**