

HARMONY AE LTD Whistleblowing Policy

Applies to: All staff (paid and unpaid), volunteers, sessional workers, contractors, governors/proprietors and supply staff working with the provision.

Purpose: to make it safe and straightforward for people to raise concerns about wrongdoing that affects children and young people in this setting — including safeguarding failures, illegal acts, malpractice, or risks of radicalisation — and to set out how those concerns will be handled in line with UK law and statutory guidance.

This policy sits alongside our safeguarding and child protection procedures and must be read together with: the SEND Code of Practice (0–25) (for SEND/SEMH practice), Keeping Children Safe in Education (KCSIE) 2025, and Prevent duty guidance. It also takes account of whistleblower protections under the Public Interest Disclosure Act (PIDA).

[GOV.UK+3GOV.UK+3GOV.UK+3](#)

1. Principles

- Children's safety and welfare are the paramount concern. All disclosures relating to the wellbeing, protection or welfare of children will be treated urgently and seriously. [GOV.UK](#)
 - Staff who raise concerns in good faith will be supported and protected from detriment or dismissal, in accordance with PIDA and GOV.UK guidance. Anonymous disclosures will be considered but, where possible, staff are encouraged to identify themselves so they can be supported. [GOV.UK+1](#)
 - We will take particular account of vulnerabilities associated with SEMH and SEND when assessing risk and supports for children. Staff must have regard to the SEND Code of Practice when concerns touch on special educational needs, provision or multi-agency arrangements. [GOV.UK](#)
 - Where a disclosure indicates an immediate risk of harm to a child or a crime, action will be taken immediately (including contacting police and/or the local authority children's social care). [GOV.UK](#)
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2. What is whistleblowing here?

A whistleblowing disclosure is a disclosure of information which, in the reasonable belief of the person making it, is made in the public interest and shows one or more of the following (examples relevant to this provision):

- a child protection or safeguarding failure; poor practice putting children at risk; abuse (including sexual, emotional, physical or neglect); failure to follow child protection policy; failures in mental health provision for vulnerable pupils; repeated or systemic poor practice.
 - a criminal offence (e.g., assault, theft, fraud, supplying illegal drugs), or the risk of such.
 - possible radicalisation or extremism concerns that are being ignored or mishandled (Prevent duty issues). [GOV.UK](https://www.gov.uk)
 - concealing or destroying information about any of the above.
- Minor employment grievances or single-person disputes should normally be raised under our grievance/complaints procedures unless they reveal a wider public interest concern.

3. Confidentiality and anonymity

- We aim to protect confidentiality for everyone involved. The identity of a whistleblower will only be shared on a strict need-to-know basis. Records will be stored securely.
- If a whistleblower wishes to remain anonymous, we will respect that wish as far as is practicable, but anonymity can limit our ability to investigate and to provide feedback. Anonymous allegations that are sufficiently specific to allow action will be investigated.
- We cannot promise absolute anonymity where disclosure of identity is required by law (for example, by police or a statutory inquiry).

4. How to raise a concern (internal routes)

We provide several reporting routes so staff can choose whichever they are most comfortable with:

1. **Immediate danger or crime** — call 999 and inform the Senior Safeguarding Lead as soon as is practicable. [GOV.UK](https://www.gov.uk)
2. **Designated Safeguarding Lead (DSL)** — raise concern in person, by phone, or by email to the DSL. (Insert DSL name & contact details here.)
3. **If the concern involves the proprietor/owner** — raise with the proprietor or, if the concern is about the proprietor, use the external routes below.
4. **In writing or by recorded delivery** — concerns can be submitted in writing marked **Private & Confidential — for the attention of DSL**.

When raising a concern, provide as much factual detail as possible (who, what, when, where, any witnesses, any supporting documents). We will acknowledge receipt of a written concern within five working days.

5. External reporting routes (where internal action is inappropriate or insufficient)

Staff may raise concerns externally when: internal reporting is inappropriate (for example, the concern is about the proprietor), or where they have reported internally but believe there has been no satisfactory action.

Key external routes:

- **Local Authority — Children’s Social Care / Safeguarding** (for child protection concerns) — contact the local authority duty team for the area where the child lives. If unsure, contact your local authority’s education/safeguarding team. [GOV.UK+1](#)
 - **Police** — where a crime has been or may be committed (999 for immediate danger).
 - **Channel / Prevent referral** — where there are concerns about radicalisation. Local PREVENT or Channel contacts through the police or local authority safeguarding hub can advise and take referrals. [GOV.UK](#)
 - **Ofsted or the DfE / Local Authority (for concerns about unregistered provision)** — where there are concerns about standards, safeguarding, or illegal/unregistered provision. Use the guidance for unregistered settings as a reference for making external referrals. [GOV.UK+1](#)
 - **Prescribed regulators / external whistleblowing bodies** — for example law enforcement or regulated professional bodies (if applicable).
 - **GOV.UK guidance for whistleblowers** — for further information on protection and external reporting. [GOV.UK](#)
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6. How we will respond

1. **Acknowledgement** — written concerns will be acknowledged within 5 working days.
2. **Initial assessment** — DSL or nominated officer will carry out a prompt, proportionate initial assessment (which may include immediate safeguarding measures) and decide next steps. Where appropriate this will involve Local Authority Children’s Services and/or the police. [GOV.UK](#)
3. **Investigation** — if a formal investigation is required, it will be led by a senior officer who is independent of the subject(s) of the complaint where feasible. Timescales will depend on complexity; the whistleblower will be kept informed of progress unless to do so would prejudice an investigation.

4. **Outcome and action** — outcomes may include internal disciplinary action, referral to statutory agencies, changes to practice, training, or external reporting. We will take remedial action to keep children safe and to address systemic failures.
 5. **Feedback** — where the whistleblower has identified themselves, they will normally receive feedback on the outcome unless confidentiality or statutory restrictions prevent this.
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7. Protection from detriment and support

- Detrimental treatment of whistleblowers (dismissal, disciplinary action, victimisation, or harassment) for raising a concern in good faith will not be tolerated and will be treated as a disciplinary matter. This protection applies even if the allegation is not upheld, provided the report was made honestly and in the public interest. [GOV.UK](https://www.gov.uk)
 - We will provide support (counselling, pastoral support, or practical adjustments) where a whistleblower experiences stress or difficulty as a result of raising a concern.
 - If a whistleblower believes they have suffered detriment for raising concerns, they should raise this immediately through the complaint/grievance procedure and may also seek independent advice (trade union or legal advice).
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8. Record-keeping and confidentiality of investigations

- All whistleblowing concerns and outcomes will be recorded and kept securely for a minimum period in line with our data retention schedule and statutory requirements. Records will include the allegation, steps taken, agencies informed, evidence, outcome and rationale.
 - Access to records will be restricted to those who need them for investigation or legal/statutory reasons.
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9. Training, awareness and prevention

- All staff (including volunteers and supply staff) will be trained to understand this whistleblowing policy, how to raise concerns, and their safeguarding duties (including KCSIE Part One awareness). Training will include awareness of SEMH and SEND-related vulnerabilities in this setting. [GOV.UK+1](https://www.gov.uk)
- Senior staff will receive additional training on handling whistleblowing disclosures, PIDA protections, and making appropriate external referrals (including Prevent/Channel referrals). [GOV.UK+1](https://www.gov.uk)

10. Prevent duty, radicalisation and extremism concerns

- Where a whistleblowing concern relates to potential radicalisation or extremism, the DSL/Safeguarding Lead must consider and, where appropriate, make a Prevent/Channel referral. Immediate safeguarding action should be taken where there is imminent risk. Staff should not investigate or try to obtain proof of extremist ideology themselves — report factual observations and concerns. [GOV.UK](https://www.gov.uk)

11. Special considerations for unregistered alternative provision

- As an **unregistered** provider, we must maintain transparent routes for concern and cooperate with local authorities and statutory agencies. Concerns about the legitimacy, safety, or legality of this provision should be escalated to the placing local authority and to the DfE/appropriate inspectorate where guidance indicates. Local authorities have duties relating to oversight of unregistered settings; staff should be prepared to work with them. [GOV.UK+1](https://www.gov.uk)

12. Roles and responsibilities (examples — insert names/details)

- **Designated Safeguarding Lead (DSL):** [name, contact]. Responsible for receiving disclosures, carrying out initial assessments and liaising with external agencies. [GOV.UK](https://www.gov.uk)
- **Senior Whistleblowing Officer / Alternative contact:** [name, contact]. Responsible for managing the whistleblowing process where DSL is implicated.
- **Proprietor / Owner:** [name, contact]. Responsible for ensuring policy implementation, training and for ensuring no retaliation occurs.

13. Timescales

- Acknowledgement of written concerns: within 5 working days.
- Initial assessment: within 10 working days of acknowledgement.
- Full investigation: timescale dependent on complexity; whistleblowers will be informed of expected timelines and any delays. (Where statutory agency action is required, that agency's timescales may apply.)

14. Monitoring and review

- This policy will be reviewed annually or sooner where statutory guidance changes (e.g., updates to KCSIE, Prevent, or SEND guidance) or following a significant

whistleblowing event. The review will include lessons learned and any changes to practice or training that are required. [GOV.UK+1](#)

15. Useful external contacts (insert local details)

- Local Authority Children's Social Care (duty team): [telephone/email]
 - Local Prevent / Channel co-ordinator: [telephone/email/police non-emergency number]
 - Police: 999 (emergency) / 101 (non-emergency)
 - DfE helpline for concerns about unregistered provision: [insert if applicable] — see GOV.UK guidance on unregistered independent schools. [GOV.UK](#)
 - GOV.UK whistleblowing guidance and legal protections:
<https://www.gov.uk/whistleblowing> (staff should consult for their legal protections).
[GOV.UK](#)
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16. Example whistleblowing checklist for staff (quick steps)

1. If immediate danger → call 999.
 2. Record the facts (who/what/when/where) and preserve evidence where safe to do so.
 3. Report to the DSL / Senior Whistleblowing Officer (details above) or submit a written report marked Private & Confidential.
 4. If concern is about DSL/proprietor or you fear reprisal, use external routes listed in section 5.
 5. Keep a copy of your report and of any responses received.
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Final notes

This policy aims to protect children and staff, ensure compliance with statutory safeguarding duties, and encourage a culture where concerns are raised early and handled transparently. If you would like, I can:

- tailor the policy with your organisation's exact contact details and a short flowchart;
- produce a one-page staff prompt sheet summarising how to raise a concern; or
- convert this into a branded PDF or staff handbook insert.

(References used in drafting this policy: SEND Code of Practice (0–25) and PDF; Keeping Children Safe in Education 2025 (Part 1 & full guidance); Prevent Duty Guidance (England &

Wales); GOV.UK whistleblowing guidance and PIDA material; guidance on unregistered independent schools and unregistered alternative provision.)



Dated: September 16th 2025

Signed:

S. Baker Victoria Ball

Reviewed date: