YOUR SAFETY.
OUR PRIORITY.
EVERY TIME.

BRIGHTFIELD ACADEMY

Inclusion. Choice. Growth.

LONE WORKING POLICY

This policy sets out Brightfield Academy's commitment to keeping lone workers safe and supported while carrying out their duties.
We plan ahead. We stay connected. We look out for each other.

ASSESS
We assess risks before working alone

COMMUNICATE
We stay in touch and let others know

PREPARE
We plan and follow safe systems of work

SUPPORT
We support each other and report concerns

RESPOND
We know what to do in an emergency

POLICY VERSION 1.0

LAST UPDATED JULY 2026

NEXT REVIEW DATE JULY 2027

INCLUSION | CHOICE | GROWTH

Whistleblowing (Protected Disclosure) Policy

BRIGHTFIELD ACADEMY
Whistleblowing (Protected Disclosure) Policy
Policy Owner: Directors
Version: 1.0
Last Update: July 2026
Review Date: July 2027

1. Introduction

Brightfield Academy is committed to the highest standards of safeguarding, integrity, openness and accountability.
Everyone working within or on behalf of Brightfield Academy has a responsibility to raise serious concerns about wrongdoing, unsafe practice, safeguarding failures or other conduct that may place learners, staff, the organisation or the wider public at risk.
Brightfield Academy wants staff and others working within the organisation to feel able to speak up at the earliest opportunity and to know that genuine concerns will be listened to, taken seriously and addressed appropriately.
No person should feel that they must remain silent because the concern relates to a colleague, manager, senior leader or Director.
This policy establishes clear arrangements for raising concerns internally and, where appropriate, externally.
Brightfield Academy will not tolerate retaliation, victimisation, harassment or other detriment against a worker because they have raised a protected disclosure.

2. Purpose

The purpose of this policy is to:
Encourage workers to raise serious concerns at the earliest opportunity.
Provide clear and accessible routes for raising concerns.
Ensure concerns are considered fairly, promptly and appropriately.
Protect learners and others from unsafe or unlawful practice.
Explain the difference between whistleblowing and a personal grievance.
Explain what may constitute a qualifying or protected disclosure.
Ensure workers understand the protection available under whistleblowing legislation.
Prevent victimisation or detriment arising from raising a protected disclosure.
Provide escalation routes where normal management arrangements are inappropriate.
Ensure concerns involving senior leaders or Directors can be raised independently.
Support a culture in which professional challenge and speaking up are welcomed.
Ensure appropriate records are maintained and lessons are learned.

3. Scope
This policy applies to workers and others working for or on behalf of Brightfield Academy, including:
Employees.
Agency workers.
Temporary staff.
Contractors.
Trainees and student placements.
Volunteers.
Directors undertaking operational duties.
Other individuals who may fall within statutory whistleblowing protections.

Brightfield Academy also encourages anyone connected with the Academy who becomes aware of serious wrongdoing to raise their concern through an appropriate route, even where they may not personally qualify for statutory whistleblowing protection.

Nothing within this policy prevents an individual from seeking independent legal advice or making a disclosure to an appropriate external or prescribed body where permitted by law.

4. Legislative and Guidance Framework
This policy has regard to relevant legislation and guidance, including:
Employment Rights Act 1996, as amended.
Public Interest Disclosure Act 1998.
Employment Rights Act 2025.
Equality Act 2010.
Children Act 1989.
Children Act 2004.
Keeping Children Safe in Education 2025, applicable until 31 August 2026.
Keeping Children Safe in Education 2026, applicable from 1 September 2026.
Working Together to Safeguard Children.
Current ACAS guidance on whistleblowing at work.
Current statutory guidance relating to prescribed persons and protected disclosures.
Relevant Local Authority safeguarding and LADO procedures.
Brightfield Academy will review this policy when legislation or statutory safeguarding guidance changes.

5. What Is Whistleblowing?
Whistleblowing is the reporting of suspected wrongdoing that is in the public interest.
In employment law, certain reports of wrongdoing are known as **qualifying disclosures**.
Where the statutory requirements are met, a qualifying disclosure becomes a **protected disclosure**, giving the worker legal protection against detriment and, for employees, protection against dismissal because they made the disclosure.
A person does not need to prove that wrongdoing has occurred before raising a concern. They should, however, have a reasonable belief that the information they are disclosing tends to show relevant wrongdoing.

6. What Can Be Whistleblown About?
Under current whistleblowing law, qualifying disclosures can concern information that a worker reasonably believes tends to show:
A criminal offence has been, is being, or is likely to be committed.
A person has failed, is failing, or is likely to fail to comply with a legal obligation.
A miscarriage of justice has occurred, is occurring, or is likely to occur.
The health or safety of an individual has been, is being, or is likely to be endangered.
The environment has been, is being, or is likely to be damaged.
Sexual harassment has occurred, is occurring, or is likely to occur.
Information relating to any of these matters has been, is being, or is likely to be deliberately concealed.

Sexual harassment became expressly included as a qualifying disclosure for whistleblowing purposes from **6 April 2026**.

Within Brightfield Academy, concerns might therefore include, for example:
Safeguarding failures.
Failure to act upon concerns about a child.
Unsafe working practices.
Deliberate breaches of health and safety requirements.
Criminal activity.
Fraud, theft or financial impropriety.
Falsification or deliberate concealment of records.
Serious breaches of legal or regulatory requirements.
Sexual harassment.
Deliberate concealment of wrongdoing.
Serious misuse of public or commissioned funding.
Attempts to suppress legitimate safeguarding concerns.
Serious failures in organisational governance.
This list is illustrative rather than exhaustive.

7. The Public Interest Requirement
For statutory whistleblowing protection to apply, the worker must reasonably believe that the disclosure is made **in the public interest**.
This does not necessarily mean that the issue must affect the general public.
A concern affecting learners, other employees, families, commissioners or another group of people may potentially satisfy the public-interest requirement.
A purely personal employment dispute will not normally constitute whistleblowing unless the concern also raises a wider matter of public interest.

8. Whistleblowing or Grievance?

Whistleblowing and grievances serve different purposes.
A **grievance** normally concerns something affecting the individual personally.
Examples might include:
Disagreement about working hours.
A dispute regarding annual leave.
A disagreement concerning an individual's workload.
A personal employment dispute.

A **whistleblowing concern** relates to wrongdoing that the person reasonably believes is in the public interest.
Examples might include:
Deliberately falsifying safeguarding records.
Concealing serious health and safety risks.
Misuse of commissioned funding.
Failure to report serious safeguarding concerns.
Criminal activity within the organisation.

There may be circumstances where an issue contains elements of both a grievance and a protected disclosure.

Where this occurs, Brightfield Academy will identify and manage the whistleblowing element appropriately rather than treating the entire matter solely as a grievance.
ACAS specifically recommends that organisational whistleblowing policies explain this distinction.

9. Safeguarding Takes Priority
Nothing in this policy replaces Brightfield Academy's safeguarding procedures.

Where a child is in immediate danger or at immediate risk of serious harm, staff must act immediately.

Where emergency assistance is required, **call 999**.

Safeguarding concerns must be reported without delay in accordance with Brightfield Academy's Child Protection & Safeguarding Policy.

Where the concern relates to the behaviour of an adult working with children, staff must follow the **Managing Allegations and Low-Level Concerns Policy**.

A concern that does not meet the harm threshold should be managed through Brightfield's low-level concerns arrangements where appropriate.

Where the allegation meets, or may meet, the harm threshold, the appropriate allegation-management process must be followed and LADO advice sought where required.

Where there is a conflict of interest in reporting an allegation through the normal internal route, direct contact with the LADO may be appropriate.

Current KCSIE specifically distinguishes allegations meeting the harm threshold from low-level concerns and provides for direct LADO reporting where there is a conflict of interest.

Staff must never delay necessary safeguarding action because they are uncertain whether a matter should technically be described as whistleblowing.

10. Our Speak-Up Commitment
Brightfield Academy expects its leaders to create an environment in which raising concerns is regarded as responsible professional behaviour.

Anyone raising a concern should be:
Listened to.
Treated respectfully.
Taken seriously.
Given appropriate support.
Kept informed where reasonably possible.
Protected from retaliation or detriment.
Reassured that raising a genuine concern will not damage their standing within Brightfield Academy.

Managers must never instruct or pressure a worker to ignore, suppress, withdraw or conceal a legitimate concern.

Staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in Brightfield's safeguarding arrangements. Current KCSIE expressly requires organisations to establish appropriate whistleblowing procedures for precisely this purpose.

11. How to Raise a Concern
A whistleblowing concern should normally be raised as soon as reasonably possible.

Concerns may be raised:
Verbally.
In writing.
By email.
Through an agreed internal reporting system.
Directly with an appropriate senior person where the normal reporting route would be unsuitable.
A worker raising a concern should provide as much factual information as they reasonably can, including:
What happened or is believed to have happened.
When and where it happened.
Who was involved.
Whether the issue is continuing.
Any immediate risks.
Details of any witnesses.
Any relevant documents or other information.
Whether the concern has previously been raised.
The worker is not expected to investigate the matter personally or prove that wrongdoing has occurred.

Brightfield Academy encourages staff to report concerns based on a reasonable belief rather than waiting until they have collected evidence themselves. Current government guidance specifically recognises that whistleblowers do not need to provide evidence before an employer investigates a concern.

12. Internal Reporting Routes
Where appropriate, concerns should initially be raised internally.

Depending upon the nature of the concern, this may be with:
The worker's Line Manager.
The Designated Safeguarding Lead (DSL), where safeguarding is involved.
A Senior Leader.
The Academy Manager.
A Director.

The person receiving the disclosure must:
Listen without dismissing or minimising the concern.
Make an appropriate record.
Consider whether immediate safeguarding or safety action is required.
Protect confidentiality as far as reasonably possible.
Ensure the concern is passed to an appropriate person for assessment.
Avoid conducting unnecessary questioning that could compromise a safeguarding, criminal or regulatory investigation.
A worker does not have to raise a concern with their immediate manager where they reasonably believe that doing so would be inappropriate.

13. Concerns About the DSL or Senior Leader
Where a concern relates to the Designated Safeguarding Lead, the disclosure should normally be made to:

A Director; or
Another appropriate senior person who is not implicated in the concern.
Where the concern involves safeguarding practice and there is a conflict of interest within the normal reporting structure, staff may contact the relevant Local Authority safeguarding service or LADO directly where appropriate.
Current safeguarding guidance expressly provides for direct reporting to the LADO where there is a conflict of interest in reporting an allegation through the usual leadership route.

14. Concerns About a Director
A worker must never be required to report a concern solely to the person who is the subject of that concern.

Where a whistleblowing concern relates to a Director, it should be raised with an alternative Director or another suitably independent person identified by Brightfield Academy.

Where no appropriate internal route is available, or where the worker reasonably believes that raising the concern internally would be inappropriate, they may seek advice or make a disclosure through an appropriate external route.

Where the concern relates to safeguarding or the conduct of an adult working with children, the relevant Local Authority safeguarding or LADO arrangements should be followed where applicable.

Brightfield Academy will maintain arrangements that allow serious concerns about senior leadership or governance to be escalated without the subject of the concern controlling the process.

15. Independent Escalation
Brightfield Academy recognises that an effective whistleblowing procedure must remain usable even where a concern involves the most senior people in the organisation.

An independent escalation route may therefore include:
An uninvolved Director.
An appropriately appointed governance or advisory representative.
An external safeguarding professional.
The Local Authority or LADO where the concern falls within their remit.
An appropriate prescribed person or regulatory body.
Independent legal advice.
Any individual appointed as an internal independent contact must:
Be sufficiently independent of the person complained about.
Understand confidentiality requirements.
Know when external referral is required.
Avoid attempting to investigate matters outside their competence.

16. Anonymous Disclosures
Brightfield Academy accepts that there may be circumstances in which a person does not feel able to identify themselves.
Anonymous disclosures will therefore be considered.

However, staff are encouraged to identify themselves where they feel able to do so because this can:
Assist investigation.
Allow clarification of information.
Enable the Academy to provide feedback.
Make it easier to offer support to the whistleblower.

An anonymous concern will not be disregarded simply because the identity of the person raising it is unknown.

When assessing an anonymous disclosure, Brightfield Academy will consider:
The seriousness of the allegation.
The credibility of the information.
Whether the information can be independently verified.
Any immediate safeguarding or safety implications.
Whether further enquiries are reasonably possible.
Government guidance also recognises anonymous reporting as an appropriate feature of whistleblowing arrangements while noting that anonymity can make investigation and feedback more difficult.

17. Confidentiality
Brightfield Academy will take reasonable steps to protect the identity of a person raising a concern where confidentiality is requested.

Information will be shared only with those who reasonably need it in order to:
Assess the concern.
Safeguard a child or adult.
Investigate wrongdoing.
Meet legal or regulatory requirements.
Obtain professional advice.
Absolute confidentiality cannot always be guaranteed.

There may be circumstances in which information must be disclosed, for example:
To protect a child or another person from harm.
To comply with legal obligations.
To enable a criminal investigation.
To meet regulatory or safeguarding requirements.
Where fairness requires disclosure during formal proceedings.
Where reasonably possible, the whistleblower will be informed before their identity is disclosed.

18. External Disclosures
Brightfield Academy encourages internal reporting where this is safe and appropriate because it may allow concerns to be addressed quickly.

However, workers may also have legal rights to make disclosures outside the organisation. A worker considering an external disclosure should ensure that the organisation or individual contacted is appropriate to the subject of the concern.

The Government maintains a statutory list of prescribed persons and bodies authorised to receive protected disclosures concerning specified matters. That list was updated on 2 June 2026.

Depending upon the subject matter, relevant external routes may include:
The Local Authority.
The Local Authority Designated Officer (LADO).
Ofsted, where the matter falls within its remit.
The Health and Safety Executive.
The Information Commissioner's Office.
HM Revenue & Customs.
The Police.

Other prescribed regulators relevant to the wrongdoing.

A disclosure to a prescribed person can qualify for statutory protection where the legal requirements are satisfied, including reasonable belief that the matter falls within that body's remit and that the information disclosed is substantially true.
Brightfield Academy will not attempt to prevent a worker from making a lawful protected disclosure.

19. Wider Public Disclosure

Disclosure to the media, social media or another third party is legally different from disclosure to an employer or prescribed person.
Statutory protection for wider disclosures applies only in more limited circumstances.

Relevant factors can include whether:
The worker reasonably believes the information and allegations are substantially true.
The disclosure is not made for personal gain.
Making the disclosure is reasonable in the circumstances.
The worker reasonably believes they may suffer detriment if they report through ordinary channels.
Evidence may be concealed or destroyed.
A substantially similar disclosure has already been made.
The matter is exceptionally serious.

Workers considering a wider public disclosure may wish to obtain independent legal or specialist whistleblowing advice first.

20. Safeguarding Whistleblowing Routes

Where a member of staff believes that:
Safeguarding concerns are not being acted upon.
Unsafe safeguarding practice is continuing.
Senior leaders are failing to respond appropriately.
They cannot safely raise a concern through Brightfield's internal arrangements.
They should use an appropriate external safeguarding route.
Current KCSIE guidance states that staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice and that other whistleblowing channels must be available where genuine concerns are not being addressed.

Possible routes may include:
Local Authority Children's Social Care.
The Local Authority Designated Officer where the concern relates to an adult working with children and falls within the relevant threshold.
Ofsted where appropriate.
The NSPCC Whistleblowing Advice Line.
Police or emergency services where criminality or immediate danger is involved.

21. What Happens After a Concern Is Raised?
The person receiving a whistleblowing concern must ensure that it is assessed promptly.

Brightfield Academy will normally:
Acknowledge receipt of the concern where the whistleblower is identifiable.
Consider whether immediate action is required.
Determine whether the issue is safeguarding, whistleblowing, grievance, disciplinary, health and safety, fraud or another category.
Identify whether an external referral is required.
Appoint an appropriate person to manage or investigate the matter.

Preserve relevant evidence.
Maintain an appropriate written record.
Consider any support required by the whistleblower.
Consider whether interim risk-management arrangements are necessary.
The Academy will avoid making promises about a particular outcome before the concern has been properly assessed.

22. Investigation
Where an internal investigation is appropriate, it will be:
Fair.
Proportionate.
Objective.
Conducted by an appropriately independent person.
Completed as promptly as circumstances allow.
Kept confidential as far as reasonably possible.
The investigator should have no material conflict of interest.

Depending upon the concern, Brightfield Academy may decide that an internal investigation should not begin, or should be paused, because the matter has been referred to:
Police.
Children's Social Care.
LADO.
Ofsted.
A regulator.
Another competent external authority.
Internal enquiries must not compromise safeguarding, criminal or regulatory investigations.

23. Feedback to the Whistleblower
Where possible, Brightfield Academy will keep the person who raised the concern appropriately informed.

Feedback may include:
Confirmation that the concern has been received.
Whether the matter has been referred elsewhere.
Confirmation that enquiries have been undertaken.
Confirmation that appropriate action has been taken.

There may be legal, safeguarding, confidentiality or employment reasons why detailed information about another person cannot be shared.

The whistleblower is therefore not automatically entitled to receive:
Confidential personnel information.
Disciplinary outcomes concerning another employee.
Safeguarding information about a child.
Information that could prejudice an investigation.

Where information cannot be shared, Brightfield Academy will explain this where reasonably possible.

24. Timescales

Brightfield Academy will aim to:
Assess urgent safeguarding or safety concerns immediately.
Acknowledge identifiable whistleblowing concerns as soon as reasonably practicable.
Make an initial assessment promptly.
Keep the whistleblower updated where an investigation is prolonged.

No rigid completion period can be guaranteed because the seriousness and complexity of disclosures will vary.

A concern involving immediate risk must never be delayed because an administrative timescale has not been met.

Government guidance recommends that whistleblowing procedures include clear timeframes and information about the type of feedback a whistleblower can expect.

25. Protection from Detriment and Victimisation
Brightfield Academy will not tolerate any form of retaliation against a worker because they have raised a protected disclosure.

A worker who makes a protected disclosure must not be subjected to detriment because they have spoken up.

Examples of detriment may include:
Bullying or harassment.
Intimidation.
Threats.
Unfair criticism.
Reduction of hours.
Removal of responsibilities without legitimate reason.
Being overlooked for training or development opportunities.
Unfavourable treatment in appraisal or supervision.
Exclusion from normal workplace activities.
Disciplinary action because a protected disclosure was made.
Any other disadvantage linked to the disclosure.

Employees must not be dismissed because they have made a protected disclosure.

Current whistleblowing law protects qualifying workers from unfair treatment and, where applicable, dismissal when the statutory requirements for a protected disclosure are met.

Any allegation of retaliation or victimisation will be taken seriously and may itself result in disciplinary or other appropriate action.

26. Confidentiality Clauses and Agreements
Nothing in an employment contract, settlement agreement, confidentiality agreement or other internal document may lawfully be used to prevent a worker from making a protected whistleblowing disclosure.

Brightfield Academy will not use confidentiality provisions to suppress legitimate whistleblowing concerns.
Government guidance confirms that confidentiality or so-called "gagging" clauses cannot prevent a worker from making a protected disclosure to an appropriate person or body.

27. Concerns Raised in Error
A worker will not be penalised simply because a concern is ultimately found to be mistaken or unsubstantiated.
The important consideration is whether the concern was genuinely raised on the basis of information the worker reasonably believed indicated wrongdoing.
Whistleblowers are not required to prove wrongdoing before raising a concern.

28. Deliberately False or Malicious Allegations
Brightfield Academy distinguishes between:
A genuine concern that turns out to be incorrect.
A concern raised without sufficient evidence but based upon a reasonable belief.
An allegation deliberately fabricated or knowingly false.
No disciplinary action will be taken simply because a genuine concern is not substantiated.
However, knowingly making a deliberately false allegation may constitute misconduct and could result in disciplinary or other appropriate action.
The fact that an investigation does not uphold an allegation does not, by itself, demonstrate that the disclosure was malicious.

29. Record Keeping
Brightfield Academy will maintain appropriate confidential records of whistleblowing concerns.

Records should include, where applicable:
Date the concern was received.
Nature of the concern.
Person or route through which it was raised.
Whether confidentiality or anonymity was requested.
Immediate risks identified.
Safeguarding action taken.
Referrals made.
Decisions reached.
Reasons for decisions.
Investigative action.
Outcomes.
Feedback provided.
Any subsequent monitoring or review.

Where the concern relates to safeguarding, records must also comply with Brightfield Academy's safeguarding recording procedures.

Current KCSIE guidance emphasises the importance of recording concerns, actions, decisions, rationale and outcomes.

30. Storage and Confidentiality of Records
Whistleblowing records will be:
Stored securely.
Accessible only to authorised individuals.
Kept separately where appropriate from routine personnel information.
Managed in accordance with Brightfield Academy's Data Protection Policy, Confidentiality Policy and Privacy Policy & Privacy Notices.
Retained only for an appropriate period having regard to legal, safeguarding and organisational requirements.
Care must be taken to avoid unnecessary identification of the whistleblower in documents circulated beyond those who need to know.

31. Learning from Whistleblowing Concerns
Brightfield Academy regards whistleblowing as an important component of organisational learning and quality assurance.

Where appropriate, following the conclusion of a concern, leadership will consider:
Whether policies require amendment.
Whether additional training is required.
Whether safeguarding systems should be strengthened.
Whether risk assessments require review.
Whether management arrangements contributed to the concern.
Whether similar concerns may exist elsewhere.
Whether communication or supervision should improve.
Whether wider lessons should be shared with staff.

Lessons may be shared in an anonymised form where this supports safer practice without compromising confidentiality.

32. Monitoring and Oversight
The Directors will maintain appropriate oversight of whistleblowing arrangements.

This may include reviewing:
Number and nature of concerns raised.
Whether concerns were responded to promptly.
Categories of concern.
Whether external referrals were required.
Recurring themes or patterns.
Allegations of victimisation.
Actions taken in response.
Whether policies or procedures require amendment.

Monitoring information should normally be anonymised unless identification is necessary for legitimate safeguarding, legal or governance reasons.

The purpose of monitoring is to identify systemic risk and strengthen organisational practice, not to discourage reporting.

33. Training and Staff Awareness
All staff will be informed about Brightfield Academy's whistleblowing arrangements as part of induction.

Training and awareness will include:

What whistleblowing means.
How whistleblowing differs from a grievance.
What may constitute a protected disclosure.
How to raise a concern.
Safeguarding reporting routes.
How to escalate a concern involving senior leadership.
External reporting options.
Protection from victimisation and detriment.
Confidentiality arrangements.

Managers and Directors responsible for receiving concerns should receive appropriate guidance on handling disclosures fairly and consistently.

Current government guidance identifies training, anonymous reporting, confidentiality, protection from victimisation, feedback and external reporting information as core elements of good whistleblowing arrangements.

34. Sources of Independent Advice
A worker may seek independent advice before or after raising a concern.

Possible sources include:
ACAS.
Protect, the whistleblowing charity.
A recognised trade union or professional association.
Citizens Advice.
An independent legal adviser.
The relevant prescribed regulator.

Workers considering an external disclosure should ensure that the organisation contacted is appropriate to the subject matter.

The Government maintains an up-to-date list of prescribed persons and bodies, which was most recently updated on 2 June 2026.

35. Safeguarding Contacts
Where the concern relates to safeguarding, relevant contact details should be maintained within Brightfield Academy's Child Protection & Safeguarding Policy and staff safeguarding information.

Designated Safeguarding Lead (DSL)
Name: Kathy Larcombe
Role: Setting Senior Leader
Email: kathy@brightfieldacademy.co.uk
Telephone: 07545123930

Deputy Designated Safeguarding Lead
Name:Nik Larcombe
Role: Setting Senior Leader
Email: nik@brightfieldacademy.co.uk
Telephone: 07395111919

Buckinghamshire Local Authority Designated Officer (LADO)
LADO Duty Desk
Telephone: 01296 382070
Email:secure-LADO@buckinghamshire.gov.uk

The LADO Duty Desk operates Monday to Thursday, 9:00am to 5:00pm, and Friday, 9:00am to 4:30pm. Buckinghamshire Council advises that concerns about adults working or volunteering with children should be reported promptly, and the LADO can also provide consultation where it is unclear whether the threshold is met.

Buckinghamshire Children's Social Care / First Response
Urgent safeguarding concerns during office hours: 01296 383962
Monday to Thursday: 9:00am to 5:30pm
Friday: 9:00am to 5:00pm

Emergency Duty Team – Out of Hours
Telephone: 0800 999 7677
Use before 9:00am, after 5:30pm Monday to Thursday, after 5:00pm Friday, at weekends and on Bank Holidays.

Education Safeguarding Advisory Service (ESAS)
For safeguarding advice for education professionals:
Telephone: 01296 387981
Email: secure-esasduty@buckinghamshire.gov.uk

NSPCC Whistleblowing Advice Line
Telephone: 0800 028 0285
This service can be used by professionals who have concerns about how child protection or safeguarding issues are being handled within their organisation.

NSPCC Child Protection Helpline
Telephone: 0808 800 5000
For advice or to report concerns about the welfare of a child.

Police
Emergency: 999
Non-emergency: 101

Where a child or any other person is in immediate danger, or where there is an immediate risk of significant harm, staff must call **999 without delay**.

Current safeguarding guidance specifically identifies the NSPCC Whistleblowing Advice Line as an external route where staff feel unable to raise safeguarding concerns internally.

36. Relationship with Other Brightfield Policies
This policy should be read alongside:
Child Protection & Safeguarding Policy.
Managing Allegations and Low-Level Concerns Policy.
Staff Code of Conduct.
Staff Handbook.
Safer Recruitment Policy.
Complaints & Compliments Policy & Procedures.
Equality, Diversity & Inclusion Policy.
Health & Safety Policy.
Data Protection Policy.
Confidentiality Policy.
Privacy Policy & Privacy Notices.
Social Media & Online Communications Policy.
Anti-Bullying Policy.
Accident, Incident & Near Miss Reporting Procedure.
Governance Framework & Terms of Reference.

Where a matter falls under more than one policy, Brightfield Academy will ensure that the appropriate elements are managed together rather than allowing procedural boundaries to prevent necessary action.

37. Policy Review
This policy will be reviewed:
At least annually.
Following significant legislative or statutory guidance changes.
Following a serious whistleblowing concern.
Where monitoring identifies weaknesses in existing arrangements.
Following significant organisational change.
The policy may be amended before its scheduled review date where this is necessary to maintain legal or safeguarding compliance.
For July 2026, Brightfield should continue to follow **KCSIE 2025 until 31 August 2026**. KCSIE 2026 has now been published but comes into force on **1 September 2026**.

38. Document Control
Document Title: Whistleblowing (Protected Disclosure) Policy
Policy Owner: Directors
Approved By: Directors of Brightfield Academy
Applies To: Employees, agency workers, temporary workers, contractors, trainees, volunteers and other individuals working for or on behalf of Brightfield Academy
Version: 1.0
Last Update: July 2026
Review Frequency: Annually
Next Review: July 2027
Approval Date: July 2026

Brightfield Academy is committed to a culture in which people are safe to speak, concerns are safe to hear, and wrongdoing is never protected by silence.

BRIGHTFIELD ACADEMY
Inclusion. Choice. Growth.

APPENDIX A
WHISTLEBLOWING REPORTING & ESCALATION FLOWCHART

Brightfield Academy encourages everyone to speak up.
Raise concerns early. We will listen, take action and protect you.

1 CONCERN IDENTIFIED

You become aware of something that concerns you about wrongdoing, unsafe practice, a safeguarding issue or other serious matter.

2 IMMEDIATE DANGER OR RISK OF SERIOUS HARM?

Is a child or adult in immediate danger?

Is emergency assistance required?

YES

ACT IMMEDIATELY

Call 999 if needed.
Follow safeguarding procedures.
Report to DSL without delay.

NO

3 RAISE INTERNALLY

Raise your concern with the most appropriate person. This may be:

- Line Manager
- Designated Safeguarding Lead (DSL)
- Senior Leader
- Academy Manager
- Director

HOW TO RAISE YOUR CONCERN

- Verbally
- In writing
- By email
- Through reporting system

Provide as much information as you reasonably can.

NO

4 CONCERN INVOLVES DSL OR DIRECTOR?

Is your concern about the DSL, a Senior Leader or a Director?

YES

5 MANAGED INTERNALLY

Your concern will be assessed and managed appropriately. You will be kept informed where possible.

We protect your identity as far as reasonably possible.

6 INDEPENDENT ESCALATION ROUTE

Report to an alternative Director or an independent contact if available.
If not, or if you feel unable to report internally, use an external or prescribed route.

7 EXTERNAL / PRESCRIBED ROUTES (WHERE APPROPRIATE)

- Local Authority Children's Social Care
- LADO — Local Authority Designated Officer
- Ofsted
- Police
- HSE — Health & Safety Executive
- ico. — Information Commissioner's Office
- Other prescribed regulator

8 RECORD, ACTION & INVESTIGATE

Your concern will be recorded, risk assessed, investigated where appropriate and action will be taken to keep people safe and address any wrongdoing.

9 FEEDBACK & LEARNING

We will provide feedback where possible and use what we learn to improve practice and prevent future issues.

SPEAK UP | WE LISTEN | WE ACT | WE PROTECT

Your voice helps keep our community safe.

BRIGHTFIELD ACADEMY

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APPENDIX B
WHISTLEBLOWING CONCERN RECORD FORM

Please complete this form as fully as possible.
The information you provide will help us to assess and respond appropriately.

1. DETAILS OF PERSON RAISING THE CONCERN

Name (if known)		Date concern raised	__/__/____
Role / Relationship to Brightfield Academy		Preferred contact method	☐ Email ☐ Phone ☐ Other _____
Contact details (email / phone)		Do you wish to remain anonymous?	☐ Yes ☐ No

Your identity will be kept confidential and shared only on a need-to-know basis. If you choose to remain anonymous, we will still consider your concern.

2. NATURE OF THE CONCERN

What is the concern about? (Please describe as clearly as possible)	

Which of the following best describes the concern? (tick all that apply)

- ☐ Safeguarding / Child Protection
- ☐ Health & Safety
- ☐ Fraud / Financial Impropriety
- ☐ Criminal Activity
- ☐ Breach of Legal Obligation
- ☐ Sexual Harassment
- ☐ Miscarriage of Justice
- ☐ Environmental Damage
- ☐ Concealment of Wrongdoing
- ☐ Other (please specify): _____

3. DETAILS OF THE CONCERN

Who is involved? (Names / roles)		
When did it happen? (Dates / times)		
Where did it happen? (Location / setting)		
Is the issue continuing?	☐ Yes ☐ No	If yes, please describe:
How did you become aware of the concern?		
What evidence or information do you have? (Documents, messages, witnesses, etc.)		
Has this concern been raised before?	☐ Yes ☐ No	If yes, when and with whom?

4. IMMEDIATE RISK / SAFEGUARDING

Does this concern suggest an immediate risk of harm to a child or adult?	☐ Yes ☐ No
If yes, what immediate action has been taken? (e.g. DSL informed, emergency services called)	

5. ANYTHING ELSE?

Is there anything else you think is important for us to know?

6. ACTION TAKEN & OUTCOME (To be completed by Brightfield Academy)

Date received	Received by (Name / Role)	Initial assessment (Brief summary)	Action taken	Referred to (If applicable)	Date closed	Outcome (Summary)	Feedback provided to whistleblower (Yes / No / N/A)

Thank you for speaking up. Your concern helps us keep people safe and improve our practice.

INCLUSION CHOICE GROWTH

Last Update: July 2026

BRIGHTFIELD ACADEMY

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APPENDIX C

WHISTLEBLOWING, SAFEGUARDING, LOW-LEVEL CONCERN, GRIEVANCE OR COMPLAINT – DECISION GUIDE

Use this guide to help you decide the most appropriate route for your concern.
If you are unsure at any point, err on the side of safeguarding and seek advice.

WHAT IS YOUR CONCERN ABOUT?

Read the questions below and follow the path that best describes your concern.

Is it about serious wrongdoing, unsafe practice or behaviour that you believe is in the public interest?

YES

WHISTLEBLOWING (PROTECTED DISCLOSURE)

Description

Concerns about serious wrongdoing, illegal activity, failures to comply with the law, health & safety risks, financial misconduct, sexual harassment, environmental damage or deliberate concealment of wrongdoing – where you believe this is in the public interest.

Examples

- Falsifying records
- Failure to act on safeguarding concerns
- Criminal activity
- Fraud or misuse of funds
- Serious health & safety risk
- Sexual harassment
- Breach of legal obligations
- Deliberate concealment

Report using

Whistleblowing (Protected Disclosure) Policy – raise internally or use an independent/ external route if appropriate.

Is it about the behaviour of an adult towards a child (or concern that may meet the harm threshold)?

YES

SAFEGUARDING ALLEGATION (HARM THRESHOLD)

Description

Concerns that an adult working with children has behaved in a way that may have harmed a child, or may pose a risk of harm to a child.

Examples

- Physical assault
- Sexual abuse or misconduct
- Emotional abuse
- Neglect
- Serious inappropriate behaviour
- Disclosures from a child

Report using

Managing Allegations and Low-Level Concerns Policy. Report to DSL immediately. LADO contact may be required.

Is it about behaviour or conduct that may be concerning but does not meet the harm threshold?

YES

LOW-LEVEL CONCERN (NOT HARM THRESHOLD)

Description

Concerns about behaviour by an adult which does not meet the harm threshold but is inconsistent with professional expectations and may benefit from being shared and recorded.

Examples

- Inappropriate language
- Being overly familiar
- Poor boundaries
- Favouritism
- One-off low-level incident
- Social media behaviour of concern

Report using

Managing Allegations and Low-Level Concerns Policy. Report to DSL or line manager. Will be recorded and monitored.

Is it about a personal work issue, decision or dissatisfaction that mainly affects you?

YES

GRIEVANCE OR COMPLAINT

Description

Concerns about decisions, treatment or situations that mainly affect you personally as an employee.

Examples

- Disagreement with management decision
- Workload or duties
- Pay, hours or leave
- Interpersonal conflict
- Working conditions that affect you only

Report using

Grievance Procedure (Staff Handbook) or Complaints & Compliments Policy & Procedures (if from a parent/carer/visitor).

If you are unsure which route to take, or if more than one box appears to fit, speak to the DSL or a Senior Leader for advice as soon as possible.

SPEAK UP. | WE ARE HERE TO LISTEN. | WE WILL ACT. | WE WILL PROTECT.

Your voice helps keep our community safe, supports others and helps us grow.

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APPENDIX D
KEY CONTACTS & INDEPENDENT REPORTING ROUTES

This appendix provides key internal and external contacts to help you raise a concern, seek advice or make an independent disclosure where appropriate.

In an emergency, always call 999.

1. BRIGHTFIELD ACADEMY – INTERNAL CONTACTS

Designated Safeguarding Lead (DSL)
Name: _____
Email: _____
Telephone: _____

Deputy Designated Safeguarding Lead
Name: _____
Email: _____
Telephone: _____

Senior Leader / Academy Manager
Name: _____
Email: _____
Telephone: _____

Director(s)
Email: _____
Telephone: _____

2. BUCKINGHAMSHIRE SAFEGUARDING CONTACTS

Local Authority Designated Officer (LADO) – Duty Desk
Telephone: **01296 382070**
Email: secure-LADO@buckinghamshire.gov.uk
Monday – Thursday: 9:00am – 5:00pm
Friday: 9:00am – 4:30pm

Buckinghamshire Children's Social Care / First Response
Telephone: **01296 383962**
Monday – Thursday: 9:00am – 5:30pm
Friday: 9:00am – 5:00pm

Emergency Duty Team – Out of Hours
Telephone: **0800 999 7677**
Before 9:00am, after 5:30pm (Mon–Thu), after 5:00pm (Fri), at weekends and on Bank Holidays.

Education Safeguarding Advisory Service (ESAS)
Telephone: **01296 387981**
Email: secure-esasduty@buckinghamshire.gov.uk
For safeguarding advice for education professionals.

3. NATIONAL SUPPORT & ADVICE

NSPCC Whistleblowing Advice Line
Telephone: **0800 028 0285**
Independent advice for professionals who have concerns about how safeguarding issues are being handled.

NSPCC Child Protection Helpline
Telephone: **0808 800 5000**
For advice or to report concerns about the welfare of a child.

Ofsted
Whistleblowing hotline: **0300 123 3155**
Email: whistleblowing@ofsted.gov.uk
Online: www.gov.uk/report-to-ofsted

ACAS
Telephone: **0300 123 1100**
Website: www.acas.org.uk
Free, impartial advice on workplace rights.

Protect – Independent Whistleblowing Charity
Telephone: **020 3117 2520**
Email: advice@protect-advice.org.uk
Website: www.protect-advice.org.uk

4. PRESCRIBED PERSONS & REGULATORS

Workers may have legal rights to make a protected disclosure to a prescribed person or body.

The current list of prescribed persons and bodies is maintained by the Government and was last updated on 2 June 2026.

View the full list:
www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

Choose a body that is appropriate to the subject matter of your concern.

5. EMERGENCY CONTACTS

Emergency Services
Call 999 if a child or any other person is in immediate danger or at immediate risk of serious harm.

Police (Non-Emergency)
Telephone: **101**
To report a non-emergency crime or concern.

6. USEFUL REMINDERS

- You can raise a concern internally, anonymously or externally.
- You are protected from victimisation for raising a genuine concern.
- You do not need proof – a reasonable belief is enough.
- Keep as much information as you can, but do not investigate.
- If in doubt, speak to the DSL or a Senior Leader for advice.

SPEAK UP. WE ARE HERE TO LISTEN.

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Your voice helps keep our community safe.

Information correct as of July 2026. Please check websites for the most up to date contact details and opening hours.

BRIGHTFIELD ACADEMY

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APPENDIX E

WHAT HAPPENS NEXT?

Whistleblowing (Protected Disclosure) – Our Process Overview

This overview shows how Brightfield Academy will handle a whistleblowing concern from the point it is raised to resolution and learning.
We aim to be fair, timely, confidential and supportive at every stage.

OUR PROCESS – STEP BY STEP

PHASE	1 CONCERN RAISED	2 RECEIPT & ACKNOWLEDGEMENT	3 INITIAL ASSESSMENT	4 INVESTIGATION OR REFERRAL	5 FINDINGS & DECISION	6 FEEDBACK	7 LEARNING & IMPROVEMENT
WHAT HAPPENS	You raise a concern internally (or via an independent/external route). We will listen and record the information provided.	We will acknowledge receipt (where you are identifiable) and let you know the concern is being considered.	We assess the concern, consider any immediate risks, decide what action is required and whether we need to refer elsewhere.	We investigate the matter (where appropriate) or refer it to another body (e.g. Police, LADO, Ofsted, regulator).	We reach findings based on the evidence and decide what action is necessary and proportionate.	We will inform you of the outcome where we are able to do so and explain any limits to the information we can share.	We review the concern and any actions taken to identify lessons and improve our policies and practice.
WHO IS RESPONSIBLE?	Person receiving the concern	Appropriate Manager / Senior Leader	Senior Leader (with DSL input if relevant)	Appointed Investigator / Relevant Lead	Senior Leader / Directors	Manager / Senior Leader	Directors / Leadership Team
TIMESCALE (GUIDE)	Immediately / as soon as reasonably practicable	Within 5 working days (where	Within 10 working days	Timescale will vary depending on the nature and complexity	As soon as possible after investigation is complete	As soon as practicable	Ongoing

YOUR RIGHTS & OUR COMMITMENT TO YOU

Confidentiality
We will protect your identity and share information only with those who need to know.

Protection
You are protected from victimisation, retaliation or detriment for raising a genuine concern.

Fairness
We will handle your concern fairly, impartially and without bias.

Information
We will keep you informed of progress where we can and explain any limits to what we can share.

Support
If you raise a concern, we will consider what support you may need and how we can help.

POSSIBLE OUTCOMES

- No further action – concern not upheld but no cause for concern identified.
- Action taken – policy, process or practice changed to reduce risk.
- Disciplinary action – where misconduct is proven.
- Referral to another body – e.g. Police, LADO, Local Authority, regulator.
- Monitoring – ongoing monitoring where appropriate.

We use what we learn to make Brightfield Academy a safer, stronger and more accountable place for everyone.

IMPORTANT REMINDERS

- You do not need proof – a reasonable belief is enough.
- You can raise a concern anonymously, but it may make investigation more difficult.
- Keep as much information as you can.
- You may report internally or go straight to an external route if you feel unable to raise it internally.
- If you are in doubt, speak to the DSL or a Senior Leader.

SPEAK UP. WE ARE HERE TO LISTEN.

Your voice helps keep our community safe and helps Brightfield Academy grow.

INCLUSION | CHOICE | GROWTH

Thank you for helping us build a brighter future.