



**FIRST STEPS TOGETHER**  
SKILLS FOR LIFE

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# **WHISTLEBLOWING POLICY**

**Last Update: September 2024**

**Next Update: September 2027**

<b>Policy Title:</b>	<b>WHISTLEBLOWING POLICY</b>
<b>Outcome:</b>	<p>This policy aims to show:</p> <ul style="list-style-type: none"> <li>● Why having a Whistleblowing policy is important</li> <li>● What whistleblowing is and the areas that it typically covers including how it differs to personal issues/grievances</li> <li>● The link with Anti-slavery and Human Trafficking concerns</li> <li>● How to raise a whistleblowing concern</li> <li>● What to do if you don't feel you can't make a whistleblowing concern internally</li> <li>● The follow up that will take place should a whistleblowing concern be made</li> <li>● How whistleblowers are protected by Law with regards to not suffering any detriment</li> <li>● Who has responsibility for this policy?</li> </ul>
<p><b>EQUALITY AND DIVERSITY STATEMENT</b></p> <p>First Steps Together is committed to the fair treatment of all in line with the Equality Act 2010.</p>	
<p><b>ENVIRONMENT, SOCIAL, GOVERNANCE (ESG) STATEMENT</b></p> <p>First Steps Together is committed to responsible business practices in the areas of: Environmental Stewardship, Social Responsibility, Governance, Ethics &amp; Compliance.</p>	

To ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, please email the named policy lead.

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## **1.0 Introduction**

We are dedicated to providing the utmost care for our children and young people and know that it is our people that are key to this. Therefore we are committed to promoting an open culture in which we all live up to our behaviours and which is based on high standards of honesty and integrity.

However we also acknowledge that at times organisations such as ours face the risk of things going wrong which may go undetected. Our people are often the first to identify concerns in the work environment. However, they may be reluctant to express their concerns because they feel that speaking up would be difficult and impact on their relationship with their colleagues, their manager or First Steps Together. That is one of the reasons we want people to feel safe in the knowledge that they can voice any concerns in confidence and that they will be taken seriously and dealt with appropriately. We want people to feel able to raise any concerns as soon as possible.

First Steps Together takes responsibility for ensuring that all staff are aware of the whistleblowing policy and procedures, and know that they can voice their concerns no matter what the circumstances. This includes anyone that feels they want/ need to raise a concern anonymously.

## **1.1 Aims**

This policy aims to:

- (a) Encourage all staff to feel confident in raising concerns and to question and act upon these concerns.
- (b) Provide ways for all staff to raise those concerns and receive feedback on any action taken.
- (c) Ensure that staff (who are not acting anonymously) receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied.
- (d) Reassure staff that they will be protected from possible reprisals or victimisation

where they have a reasonable belief that they may have made any disclosure in good faith.

## **2.0**

### **2.1 What is Whistleblowing?**

Whistleblowing inside the workplace is defined as the reporting by workers or ex-workers of wrongdoing, such as fraud, malpractice, mismanagement, risk or actual damage to the environment, breach of health and safety law, or any other illegal or unethical act on the part of either management, the governors or fellow employees. Workers may include volunteers, contractors and outside agencies or others.

### **2.2 Qualifying disclosures**

By law, there are several issues you can whistle blow about. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that wrongdoing or danger at work exists.

Qualifying disclosures include the following:

- a criminal offence – for example, if an employer has been trying to bribe people
- the breach of a legal obligation by an organisation – for example, if an employer has neglected their duty of care towards children.
- a miscarriage of justice – for example, if a member of staff has been fired for something that turned out to be a computer error
- someone's health and safety being in danger – for example, if an employer has forced staff to serve food they know has been contaminated
- damage to the environment – for example, if an employer has been regularly polluting local rivers

- You can also whistle blow about someone trying to cover up information about any of these issues.

You can make a qualifying disclosure about an issue that's happened at any time. This includes if it's likely to happen in the future. You can report one or more qualifying disclosures. The law provides protection for workers who raise legitimate concerns about specified matters or "qualifying disclosures".

### **2.3 How whistleblowing differs to a grievance**

It is important to remember that whistleblowing is very different from a complaint or a grievance.

A **grievance** is when an employee/employees has a dispute about his or her own employment position.

A **complaint** is when you or someone close to you has been poorly treated and you are seeking redress or justice for yourself or that person. This should be dealt with via the First Steps Together Complaints Policy. Each School has their own policy.

Staff who are concerned about the conduct of a colleague towards a child or young person must remember though that the welfare of the child is always paramount. If staff have concerns about a child they must follow the school **child protection policy and procedures**. Where staff have a concern about a professional that works with children and young people or vulnerable adults, they must follow the **school allegations against staff policy**.

**However at all times our overarching aim is that we want people to feel confident to raise any concerns. Therefore if you are unsure which is the correct policy to follow then please contact the HR Department 0330 118 0974**

## **2.4 Human Trafficking and Modern slavery**

This policy also enables staff to raise concerns about human trafficking and modern slavery if it does not relate to a child in the care of First Steps Together, or a professional that works with children/young people or vulnerable adults, as it may apply to any business or company providing goods and/or services across the entirety of our supply chain.

If you have any concern about Modern Slavery or Human Trafficking, and it relates to a child in the care of First Steps Together, or a professional that works with children/young people or vulnerable adults, this must be reported to the Head Teacher. The Head Teacher or must then report the concern directly to the governing board.

## **3.0 How to raise a whistleblowing concern**

### **3.1 Internally**

We want to ensure that raising a whistleblowing concern is as straightforward as possible for people. Therefore should you have a concern which falls under the category of whistleblowing and a qualifying disclosure, then please contact the headteacher. If the concern is regarding the Head Teacher, please contact the chair of the governing body. If your concern is regarding the governing body then please contact the local LADO service.

Should you need to raise a whistleblowing concern then it is always beneficial to provide as much information as possible, including details of exactly what you are reporting with times, dates, places and any other witnesses if relevant.

We do not encourage staff to make disclosures anonymously, as this makes a thorough investigation much more difficult or impossible to carry out if we cannot obtain further information from you. However, should we receive any concerns anonymously, then we will look into them as much as possible based on the information available.



### 3.2 External disclosures

We encourage all our staff to follow the internal procedures outlined in this policy, but understand that in some cases they may feel it is necessary to take their concerns to external agencies. This should, however, be done only as a last resort. Staff would generally only approach external agencies regarding their concerns without discussing them internally first if:

- they feel that they are being discriminated against and that there is no internal authority that can be contacted with trust
- they reasonably believe that they will be victimised if they follow internal procedures for whistleblowing
- they believe that the concern they have raised has not been taken seriously or acted upon correctly.

Staff who take their concerns to external agencies where possible and unless there is a good reason to do so, should not disclose any confidential information. Information that is confidential and should therefore not be disclosed is outlined in your contract of employment. **Note: it is against the law to publish any information, which may lead to the identification of a teacher who is subject to an allegation.**

### 4.0 Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation needed. Based on the information provided we will also decide whether the concern is in line with whistleblowing or if we feel, based on the information available, it falls under another policy. It might be at this stage we need to ask you for any additional information. However we will discuss this with you and inform you of the outcome of our assessment. You might be asked to attend a meeting in order to provide additional information. In some cases we may appoint an investigator or team of investigators and this

might include staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) will collate findings and report back on them so that we may make recommendations for change to enable us to minimise the risk of future wrongdoing and also to address any issues. This will be sent to the HR Manager.

From the onset we will aim to keep you informed of the progress of the investigation, its likely timescale and outcome. It is important to remember though, that sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. We would also require you to ensure that you treat any information about the investigation as confidential.

## **5.0 Protection and support for whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions. Our aim is to encourage openness, and we will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should contact the HR Department. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

### **5.1 False allegations**

We feel it is only right to highlight that should we conclude that a whistleblower has made false allegations maliciously, or with a view to personal gain, the whistleblower may be subject to disciplinary action.

## **6.0 Responsibility for this policy**

### **6.1 All staff**

It is the responsibility of all covered by the scope of this policy to report any issues in line with the processes detailed within this policy.

### **6.2 Leadership Team / Line Managers**

All members of the leadership team and those with line management responsibilities are responsible for investigating and addressing any concerns that might be raised to them and ensuring they are escalated and addressed appropriately.

### **6.3 Executive Committee**

The Governing Board has an overall responsibility to ensure that any concerns of a high level of severity are thoroughly investigated and any issues identified and addressed appropriately. The HR Manager is responsible for informing EXCOM. They will also receive regular data on Protected Disclosures (whistleblowing) received across First Steps Together as part of the Governance and Compliance committee.

## **7.0 References**

[Anti-slavery and Human Trafficking](#)

[Health and Safety Executive](#)

## **8.0 Associated Forms**

None

## **9.0 Appendices**

Appendix 1 – Key Contacts

## Appendix 1 – Key Contacts

The external authorities that may be of help to you are:

Authority - Hyperlink	Telephone:	Email address (if available)
<a href="#">National Child Abuse Whistleblowing Advice Line (NSPCC)</a>	0800 028 0285	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<a href="#">Ofsted - Report Concerns about Children's Social Care</a>	0300 1233155	<a href="mailto:Whistleblowing@Ofsted.gov.uk">Whistleblowing@Ofsted.gov.uk</a>
<a href="#">Department for Education (DfE)</a>	0370 000 2288	
<a href="#">Children's Commissioner - (matters relating to the rights, welfare and interests of children)</a>	08005280731	<a href="mailto:Help.team@childrenscommissioner.gov.uk">Help.team@childrenscommissioner.gov.uk</a>
<a href="#">Police</a>	Specific to location	Specific to location

<u>Local Authority Designated Officer</u> (LADO)	Specific to location	Specific to location
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## WHISTLEBLOWING PROCEDURE

**Have you seen or heard something that worries you?**

**If you can't tell your manager, tell us your concerns about:**

- The standards, Procedures, or practices within FST
- The actual or potential harmful treatment of service users, particularly Children or young people and vulnerable adults
- The behaviour of employees or managers
- The conduct of a contractor or partner organisation
- Any potential health and safety risks
- Any practice you think breaks the law

THE CONCERN IS ABOUT STAFF AT FST	THE CONCERN IS ABOUT THE HEADTEACHER	THE CONCERN IS ABOUT THE GOVERNING BODY
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CONTACT HEADTEACHER	CONTACT THE CHAIR OF GOVERNORS NICK LEDGER	CONTACT LADO
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NATALIE OGDEN (The Watkins Centre) <a href="mailto:n.ogden@firststepstogether.uk">n.ogden@firststepstogether.uk</a>	CHAIR OF GOVERNORS <a href="mailto:chair@firststepstogether.uk">chair@firststepstogether.uk</a>	THE WATKIN – MANCHESTER LADO 0161 234 1214
NATALIE OGDEN (Kershaw Wood) <a href="mailto:n.ogden@firststepstogether.uk">n.ogden@firststepstogether.uk</a>	CHAIR OF GOVERNORS <a href="mailto:chair@firststepstogether.uk">chair@firststepstogether.uk</a>	KERSHAW WOOD – DERBYSHIRE LADO 01629 533 190
NATALIE OGDEN (Peak Forest) <a href="mailto:n.ogden@firststepstogether.uk">n.ogden@firststepstogether.uk</a>	CHAIR OF GOVERNORS <a href="mailto:chair@firststepstogether.uk">chair@firststepstogether.uk</a>	PEAK FOREST – TAMESIDE LADO 0161 42 4398