

Whistleblowing Policy

Field	Description
Document title	Whistleblowing Policy
Version	V23.0
Author	Castle & Coast Manager & DSL
Date issued	01/04/2026
Status	Approved
Approved by	Trustees
Review date	01/04/2027
Document location	Document Control SharePoint - Subcontractor

1. Introduction

1.1 The purpose of this Whistleblowing Policy is to encourage and enable people to raise concerns about any unethical, illegal, or inappropriate conduct within Step into Learning, without fear of retaliation. This policy is aligned with the Public Interest Disclosure Act (PIDA) and the Employment Rights Act 2025.

2. Scope

2.1 This policy applies to all employees, contractors, vendors, volunteers, learners and stakeholders of Step into Learning.

3. Definition & Qualifying Disclosures

3.1 Whistleblowing refers to the act of reporting concerns or suspicions of unethical, illegal, or inappropriate conduct within the organisation. In accordance with current legislation and KCSIE 2025/26, qualifying disclosures include, but are not limited to:

- Fraud, bribery, corruption, or financial misconduct.
- **Sexual Harassment:** Explicitly protected under the Employment Rights Act 2025.
- **Online Safety & AI:** Safeguarding harms involving generative AI, disinformation, or conspiracy theories.
- **Duty of Candour:** Breaches of the legal duty to be transparent during investigations, as per the Public Office Accountability Act.

- Safety violations, malpractice, or discrimination.

4. Policy Statement: Whistleblowing vs Grievance

4.1 A whistleblowing concern is about a risk, malpractice, or wrongdoing that affects others (learners, the public, or the organization) where the individual acts as a witness. A grievance is a personal complaint about an individual's own employment situation or treatment.

5. Procedures for Reporting

5.1 **Internal Reporting:** Employees should report concerns to their immediate line manager. If the concern involves the manager, reports should be made to the Executive Director or Board of Trustees.

5.2 **Safeguarding & Low-Level Concerns:** In line with **KCSIE 2025**, staff must raise safeguarding concerns with senior leadership. This policy works alongside the "Low-Level Concerns" framework for behaviour that does not meet the harm threshold but requires oversight.

5.3 **Assessment Malpractice:** If the disclosure relates to assessment malpractice, the relevant Awarding Organisation's policy must be followed.

6. External Disclosures

6.1 While we encourage internal reporting, concerns may be referred externally to:

- Ofsted or the DfE/ESFA (<https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures>).
- The NSPCC Whistleblowing Advice Line (0800 028 0285).
- The Police, Charity Commission, or relevant Awarding Organisation.

7. Confidentiality and Anti-Retaliation

7.1 All reports will be treated with the utmost confidentiality.

7.2 **Non-retaliation:** Step into Learning strictly prohibits retaliation against any whistleblower reporting in good faith. Retaliation may result in disciplinary action, up to and including termination. No "gagging clauses" or NDAs shall be used to prevent a protected disclosure.

8. Investigation and Follow-up

8.1 All reports will be investigated within 10 working days by:

- **Executive Director:** Kelly.Channon@stepintolearning.org.uk
- **Board of Trustees:** Vickie.Bishop@stepintolearning.org.uk

8.2 Whistleblowers will be informed of the outcome to the extent possible.

8.3 False Reports: Intentionally making false or malicious accusations is a violation of this policy and may lead to disciplinary action.

9. Resources

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996
- Employment Rights Act 2025
- Public Office Accountability Act (Hillsborough Law)
- Non-Disclosure Agreements (NDAs)
- Keeping Children Safe in Education (KCSIE) 2025/26
- Ofsted Education Inspection Framework (EIF) 2026
- Early Years Statutory Framework (EYFS) 2025
- Prescribed Persons Order 2014