

WHISTLEBLOWING POLICY

REFERENCE:	V01 – 04/2024
OWNERSHIP:	Winnipeg Project
AUTHORISED BY:	Hayley Wilkinson
REVIEW:	Annually – next review September 2027

PURPOSE

The purpose of this policy is to outline Winnipeg Project commitment to responsible and fair business practices. Winnipeg Project is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. In an education context, this includes concerns about safeguarding practice/failures and risks to children's welfare.

Winnipeg Project's reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values.

Winnipeg Project is therefore committed to fair and honest business in all its dealings. What constitutes a "qualifying disclosure" and the process to report wrongdoing is outlined in this policy.

Day-to-day operational responsibility for the policy is held by the **Whistleblowing Officer** (Managing Director or delegated senior officer) and HR; **safeguarding-related** concerns must also be notified to the **DSL** the same day.

SCOPE

This policy applies to all Winnipeg Project directors, employees, contractors and volunteers. This policy does not form part of any employee's contract of employment and Winnipeg Project may amend it at any time.

SAFEGUARDING COMMITMENT

As an organisation that prioritises the safeguarding of children and all vulnerable people, The Winnipeg Project School UK is committed to providing a safe environment across all we do by actively adopting strategies that embed a culture of zero tolerance for abuse of any kind.

DEFINITIONS

- **Whistleblowing:** Raising a concern about actual or suspected wrongdoing or risks that are in the **public interest**(not a personal employment grievance).

- **Whistleblower:** Anyone working in or for Winnipeg Project (including agency, contractors and volunteers) who makes a disclosure in the public interest.
- **Public Interest Disclosure (PIDA) / Protected Disclosure:** A disclosure made under the **Public Interest Disclosure Act 1998** that is protected in law when the concern meets the tests in this policy.
- **Qualifying Disclosure:** Information that, in the whistleblower's reasonable belief and in the public interest, indicates a **relevant failure** such as: criminal offence; breach of legal obligation; miscarriage of justice; endangering health and safety; environmental damage; or deliberate concealment of any of these.
- **Relevant Failure:** Any of the categories listed immediately above (past, present or likely future).
- **Detriment:** Any negative treatment of a whistleblower for raising a concern (e.g., dismissal, disciplinary action, threats, loss of opportunities or other unfavourable treatment).
- **Anonymous Disclosure:** A disclosure made without revealing identity. will consider and investigate these so far as practicable, noting that anonymity can limit enquiries.
- **Confidential Disclosure:** A disclosure where identity is known to but kept confidential and shared only where necessary to investigate.
- **Whistleblowing Officer:** The Managing Director (or delegated senior officer) responsible for day-to-day operation of this policy.
- **Investigating Manager:** A manager appointed to assess and investigate concerns raised under this policy.
- **Designated Safeguarding Lead (DSL):** Lead role for safeguarding. **Safeguarding-related whistleblowing concerns must be notified to the DSL the same day.**

RESPONSIBILITIES

Education Leadership Team/Directors (ELT)

- **Ownership & assurance:** Owns and annually reviews this policy; assures legal compliance with **PIDA 1998** and alignment with related policies (Grievance, Disciplinary, Code of Conduct, Safeguarding).
- **Culture & protection:** Sets a speak-up culture with zero tolerance of retaliation; monitors that whistleblowers are protected from detriment and that learning leads to improvement.

- **Governance:** Receives periodic (e.g., termly) anonymised reports on concerns, themes, timeliness, outcomes and safeguarding interfaces; commissions actions for systemic risks.
- **AP context:** Ensures staff are reminded of education-specific routes (DSL, KCSIE Part 1 expectations) and external options (NSPCC; prescribed persons).

Whistleblowing Officer (Managing Director or delegated senior officer)

- **Operational lead:** Maintains procedure, routes and contact points; ensures visibility in induction and refreshers.
- **Triage & allocation:** Acknowledges concerns within 5 working days, appoints an Investigating Manager, and sets a proportionate plan and timescales.
- **Safeguarding interface:** Immediately informs/coordinates with the DSL for any safeguarding-related concerns and ensures same-day action.
- **Confidentiality & records:** Protects identities where requested/feasible; keeps secure records and limits access in line with UK GDPR/DPA 2018 and retention schedules.
- **Escalation:** Seeks external advice or referral to prescribed persons/regulators where appropriate; updates ELT on themes and risks.

Designated Safeguarding Lead (DSL)

- **Same-day action:** Receives safeguarding whistleblowing concerns and acts the same day, following safeguarding procedures and statutory guidance.
- **Liaison:** Coordinates with external agencies where required and provides feedback (as appropriate) to the Whistleblowing Officer.
- **Staff awareness:** Ensures staff are signposted annually to DSL routes and the NSPCC Whistleblowing Advice Line.

Provision Leads & Line Managers

- **First line route:** Encourage early, open reporting; receive and escalate concerns promptly (especially where concerns relate to the line manager).
- **Fair handling:** Treat concerns objectively, protect staff from detriment, and refer immediately to the Whistleblowing Officer/HR; involve DSL without delay for safeguarding matters.
- **Induction & reminders:** Ensure team members complete training and know internal and external routes (including NSPCC and Protect helpline).

Investigating Manager

- **Impartial investigation:** Plan and conduct timely, proportionate investigations; gather evidence/witness statements; maintain confidentiality.
- **Communication:** Provide updates at key stages and a written outcome on completion, mindful of legal/privacy limits.
- **Follow-on actions:** Recommend corrective actions and interfaces with Disciplinary/Grievance processes where relevant.

HR

- **Support & process integrity:** Advise all parties; ensure fair process and that any related employee relations procedures are followed appropriately.
- **Records & reporting:** Maintain secure, minimal-access records; support ELT reporting and learning from cases; monitor for detriment post-disclosure.

All Staff, Volunteers, Contractors and Agency Workers

- **Speak up:** Raise genuine concerns promptly via the routes in this policy; use the DSL for safeguarding concerns the same day.
- **Co-operate & confidentiality:** Support enquiries and respect confidentiality.
- **No retaliation:** Do not victimise or subject whistleblowers (or those supporting them) to detriment; breaches may be managed under the Disciplinary Policy.
- **External routes:** If unable to raise internally, consider routes to prescribed persons/regulators, the NSPCC Whistleblowing Advice Line, or Protect (independent charity).

POLICY

Under the Public Interest Disclosure Act 1998, all people at work (including agency temps and contractors) are covered by this policy when making a disclosure of information that, in their reasonable belief, is made in the public interest. They will be protected by law from victimisation, harassment or discrimination as a result of the disclosure being made if the matter relates to a qualifying disclosure.



Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” is a disclosure of information that the person genuinely and reasonably believes is in the public interest and shows that the Company has committed, or will commit a “relevant failure” in the past, present or future, by:

- Committing a criminal offence
- Failing to comply with a legal obligation
- A miscarriage of justice
- Endangering the health and safety of an individual
- Environmental damage or
- Concealing any information relating to the above

Nothing in any contract, settlement or confidentiality clause prevents a protected disclosure in the public interest (PIDA 1998).

will take any concerns raised relating to the above matters very seriously. The disclosure must be reasonably believed to be “in the public interest” and encourages the use of the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, it should be raised under the Grievance Policy.

PROCEDURE

How to raise a Concern

In many cases it should be possible to raise any concerns with the line manager. Where the concern relates to the line manager or it is not appropriate to make the report to them, it may be reported to their line manager. However, where it is preferred not to raise it with the manager (or their manager) for any reason, it should be raised with the Managing Director or HR. Their contact details are at the end of this policy.

Where a concern relates to child protection/safeguarding practice, staff may also raise it directly with the Designated Safeguarding Lead (DSL). If staff feel unable to raise an issue internally, they may contact the NSPCC Whistleblowing Advice Line (0800 028 0285; help@nspcc.org.uk).

Concerns are best raised in writing, setting out the background and history of the concern. However, they can be discussed in a meeting if it is not possible for any reason to put the



concerns in writing.

A meeting will be arranged as soon as possible to discuss the concern. Anyone raising a concern, may bring a colleague or union representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

After this meeting, the investigating manager will commence a full investigation, aiming to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigating manager will write to the individual who made the disclosure confirming the outcome. We will acknowledge receipt within 5 working days, and provide updates at key stages where legally possible.

If the individual who made the disclosure is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body (see External Disclosures below). Alternatively, they may raise a formal complaint under 's Grievance Policy.

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Confidentiality

The intention is that employees will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If an individual wants to raise their concern confidentially, every effort will be made to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. Anonymous disclosures will be considered and investigated so far as practicable. Whistleblowing records are handled confidentially and in line with UK GDPR/DPA 2018 (limited access; retention per Winnipeg Project schedules).

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. We encourage internal disclosure where safe and practicable, but PIDA recognises that disclosures may be made to prescribed persons/regulators (see GOV.UK 'Whistleblowing') and, for safeguarding practice concerns, to the NSPCC Whistleblowing Advice Line.

The law recognises that in some circumstances it may be appropriate to report your concerns to

an external body such as a Regulator. We strongly encourage seeking advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy. The DSL route and NSPCC line are highlighted to all staff annually (KCSIE Part 1).

Protection and Support for Whistleblowers

In order to encourage openness we will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any bullying, harassment or any other detrimental treatment as a result of raising a genuine concern. 'Detriment' includes dismissal, disciplinary action, loss of opportunities, threats or unfavourable treatment. Allegations found to be malicious may be addressed under the Disciplinary Policy; good-faith mistakes will still be supported. Anyone found to have acted in such a manner will be subject to disciplinary action. If anyone believes they have suffered any such treatment, they should inform their line manager or other appropriate person immediately. If the matter is not remedied, they should raise it formally using the Grievance Procedure.

However, if it is concluded that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Protect operates a confidential helpline. Their contact details are at the end of this policy.

Contacts

Designated Safeguarding Lead (DSL)	Hayley Wilkinson
Managing Director	Lee Wilkinson
Operations Director	Hayley Wilkinson
HR	Hayley Wilkinson
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk

THIRD PARTIES

may at any time engage with a third party for support and expertise regarding actions relating to



this policy.

CONTEXT

AP context (non-school AP): Winnipeg Project operates as a non-school Alternative Provision (AP). Staff must feel safe to raise concerns about wrongdoing or safeguarding practice. We adopt KCSIE 2025 (Part 1) whistleblowing expectations as good practice: where staff feel unable to raise an issue internally, the NSPCC Whistleblowing Advice Line is available as an alternative route (0800 028 0285; help@nspcc.org.uk).

This procedure relates to the following legislative requirements, standards and internal documents:

Standards & Regulations	- Public Interest Disclosure Act 1998 - Keeping Children Safe in Education (KCSIE) 2025 — Part 1 expectations on whistleblowing routes in education (adopted as good practice for non-school AP)
Related Forms & Documents	- UK Anti-Corruption & Bribery Policy - UK Code of Conduct - UK Disciplinary policy - UK Grievance Policy

VERSION CONTROL

Version	Date	Change Summary	Author/Reviewer	Approved by:
1	Sept 25	Initial		