Whistleblowing Policy

Approved by:	Lauren Meston	**Date:**	17/08/2026
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1. Introduction and commitment

Future Pathways CIC is committed to a culture of safeguarding, openness, accountability and professional curiosity. Everyone working in or on behalf of Future Pathways should feel able to speak up about wrongdoing, malpractice, unsafe practice or failures in safeguarding without fear that doing so will damage their employment, placement, working relationships or future opportunities.

Whistleblowing is an important part of safeguarding. Keeping Children Safe in Education (KCSIE) 2026 states that all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in safeguarding provision, and that appropriate whistleblowing procedures should be available to them.

This policy replaces the previous Whistleblowing Policy. It reflects KCSIE 2026, Department for Education whistleblowing guidance, the Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998, and current 2026 government and Acas guidance on protected disclosures.

2. Purpose and aims

- encourage concerns to be raised early, safely and through clear routes;
- ensure safeguarding or other serious wrongdoing is not concealed, minimised or ignored;
- protect workers who make qualifying protected disclosures from dismissal or detriment in accordance with the law;
- provide a safe internal route for staff, agency workers, contractors, trainees and others to report concerns;
- allow volunteers and others who may not have statutory whistleblowing protection to raise concerns under this organisational policy;
- distinguish whistleblowing from personal grievances, complaints, safeguarding allegations and low-level concerns while ensuring concerns are directed to the correct process;
- ensure disclosures are assessed promptly, investigated fairly and recorded securely;
- promote learning and improvement where concerns identify weaknesses in systems, culture or safeguarding practice.

3. Legal and guidance framework

- Employment Rights Act 1996, Part IVA, as amended by the Public Interest Disclosure Act 1998;
- Keeping Children Safe in Education 2026, including whistleblowing, allegations and low-level concerns;
- Department for Education: Whistleblowing procedure for maintained schools and current education-sector whistleblowing guidance;
- Department for Business and Trade: Whistleblowing guidance for employers (2026);
- Acas: Whistleblowing at work guidance, updated 2026;
- Equality Act 2010, including protection from unlawful discrimination and victimisation;
- Working Together to Safeguard Children;
- Data Protection Act 2018 and UK GDPR.

Where the precise statutory route depends on Future Pathways' legal status or the status of the person making the disclosure, Future Pathways will apply the relevant legal framework and will not use technical uncertainty as a reason to ignore a genuine concern.

4. What is whistleblowing?

Whistleblowing is the reporting of information about wrongdoing that a worker reasonably believes is in the public interest. The concern may relate to something that has happened, is happening, or is likely to happen.

A protected disclosure may concern:

- a criminal offence;

- a breach of a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any person;
- damage to the environment;
- sexual harassment, which is a qualifying disclosure under whistleblowing law from 6 April 2026;
- deliberate concealment of information about any of the above.

In an education setting, whistleblowing may also involve concerns about systemic safeguarding failures, unsafe staffing or supervision, failure to follow child-protection procedures, concealment of allegations, falsification of safeguarding records, unsafe recruitment, inappropriate use of force, serious misuse of public or organisational funds, fraud, serious data/security breaches or other wrongdoing affecting young people or the public interest.

5. What whistleblowing is not

Whistleblowing is different from a personal grievance. A grievance is usually about how an individual has personally been treated at work. Personal employment concerns should normally be raised under the Grievance Procedure unless they also contain information amounting to a public-interest disclosure.

A complaint from a parent, carer, learner or member of the public should normally be managed through the Complaints Policy. However, information received through any route must still be escalated if it reveals safeguarding, criminal or other serious wrongdoing.

Concerns about the conduct of an individual adult towards a child must not be delayed while deciding which policy applies. The safeguarding route below must be followed immediately where relevant.

6. Who may raise a concern?

This policy may be used by employees, agency or supply staff, apprentices, contractors, trainees, consultants and other workers. Future Pathways also encourages volunteers, trustees/directors, work-experience adults and partner professionals to raise concerns under this policy even where statutory whistleblowing protection may not apply to their legal status.

Nobody is expected to investigate the matter themselves or prove that wrongdoing has occurred before speaking up. A reasonable concern should be raised promptly with the information available at the time.

7. Internal reporting routes

Primary route

Concerns should normally be raised with Lauren Meston, Managing Director and Designated Safeguarding Lead, or with the person's line manager if the concern does not involve that manager and they are an appropriate person to receive it.

Alternative internal route

If the concern involves Lauren Meston, a line manager, or another person who would create a conflict of interest, the disclosure should be made to a Trustee/Director who is not implicated. Safeguarding concerns may also be raised with a Deputy DSL where appropriate.

Future Pathways' current safeguarding team includes Beckie Broadhead, DDSL, and Pete Meston, DDSL. A person raising a concern does not have to use a management route that they reasonably believe is compromised.

How to raise the concern

A disclosure may be made verbally or in writing. Writing is encouraged because it helps create a clear record, but Future Pathways will not reject a concern because it was raised orally.

Where possible, include:

- what has happened or may happen;
- who is involved;

- relevant dates, times and locations;
- why the matter causes concern;
- whether it has already been raised and what happened;
- any information or documents already legitimately available to the whistleblower.

The whistleblower should not put themselves or others at risk, access records without authority, conduct covert investigations or obtain evidence unlawfully.

8. Safeguarding concerns and concerns about adults

Safeguarding concerns must be acted on immediately. Whistleblowing does not replace the Safeguarding and Child Protection Policy, Low-Level Concerns Policy or allegations procedure.

1. If a child is in immediate danger or at risk of serious harm, call 999 and inform the DSL/DDSL without delay.
2. If there is an allegation or safeguarding concern that an adult working with children may have harmed a child, committed a criminal offence against or related to a child, behaved in a way indicating they may pose a risk to children, or behaved in a way suggesting they may not be suitable to work with children, follow the allegations/harm-threshold procedure immediately.
3. If the concern about an adult does not meet the harm threshold, follow the Future Pathways Low-Level Concerns Policy.
4. If the concern relates to Lauren Meston or creates a conflict of interest, report it through the alternative senior/governance route and contact the Local Authority Designated Officer (LADO) directly where the harm-threshold procedure requires this.

Doncaster LADO contacts: Milovan Orlandich and Tony Dobbs; email LADO@doncaster.gov.uk; telephone 01302 737332. Current local-authority contact information should be checked before use.

9. External whistleblowing routes

Future Pathways encourages internal reporting where it is safe and appropriate, but a worker is not required to keep a serious concern internal where the law permits an external disclosure. Depending on the issue, external routes may include a legal adviser, a prescribed person or body, the police, a regulator or another appropriate authority.

For safeguarding practice concerns, KCSIE identifies the NSPCC Whistleblowing Advice Line as an alternative route where staff do not feel able to raise concerns internally or believe genuine concerns are not being addressed:

- NSPCC Whistleblowing Advice Line: 0800 028 0285;
- Email: help@nspcc.org.uk.

Other possible prescribed or advisory routes may include Ofsted where the concern falls within its remit, the Department for Education where its whistleblowing jurisdiction applies, the Health and Safety Executive for relevant health and safety matters, the Information Commissioner's Office for relevant data-protection matters, or another regulator listed in the current government list of prescribed persons and bodies.

Workers may also seek independent advice from Acas, their trade union, a legal adviser or Protect, the UK whistleblowing charity. A person considering disclosure to the media or another wider recipient should obtain independent advice because the legal tests for protection are more demanding.

10. Protection from detriment and victimisation

Future Pathways will not tolerate retaliation, bullying, intimidation, disadvantage or other detrimental treatment because somebody raised a genuine concern or protected disclosure. Examples can include threats, exclusion, reduction of hours without legitimate reason, denied development opportunities, unfair treatment, adverse references or other reprisals.

Workers who make a qualifying protected disclosure are protected by law from detriment and, for employees, from automatically unfair dismissal because of whistleblowing. Protection begins from the start of employment where the legal criteria are met.

Anyone who believes they have suffered retaliation for raising a concern should report this immediately to the Managing Director or, where inappropriate, to an uninvolved Trustee/Director and may seek independent advice from Acas, Protect, a trade union or legal adviser.

11. Confidentiality and anonymity

Future Pathways will take reasonable steps to protect the identity of a whistleblower who asks for confidentiality. Information will be shared only where there is a legitimate need to know.

Absolute confidentiality cannot be guaranteed. Identity may need to be disclosed where required by law, where necessary to protect a child or another person, to enable a fair investigation, or as part of police, regulatory, disciplinary or legal proceedings. Where possible, this will be discussed with the whistleblower before disclosure.

Anonymous disclosures will be considered. Anonymity may make an investigation more difficult and may prevent Future Pathways from seeking clarification or providing feedback, but an anonymous concern will not be dismissed merely because the person has not identified themselves.

12. How Future Pathways will respond

Every disclosure will be acknowledged and triaged promptly. The person receiving it must consider immediate safety, safeguarding, evidence preservation, conflicts of interest and which process or authority should lead.

5. Record the concern accurately and the date/time it was received.
6. Assess whether urgent safeguarding, police, LADO, health and safety, regulatory or other action is required.
7. Identify an impartial person to oversee or investigate the matter.
8. Protect relevant records and evidence lawfully.
9. Clarify the concern with the whistleblower where possible without requiring them to prove the case.
10. Decide whether the matter will be investigated internally or referred externally.
11. Keep the whistleblower informed at appropriate intervals, subject to confidentiality and legal restrictions.
12. Record the outcome, decisions, rationale and any organisational learning or remedial action.

Future Pathways will aim to acknowledge a named disclosure within five working days and to provide an initial indication of the proposed route within ten working days where reasonably practicable. Complex safeguarding, regulatory or criminal matters may take longer and external agencies may control timescales.

13. Fairness to people named in a disclosure

A whistleblowing allegation is not, by itself, proof of wrongdoing. Future Pathways will act to protect children and others while ensuring that investigations are fair, proportionate and free from predetermined conclusions.

A person who is the subject of a disclosure will normally be informed of the substance of concerns at an appropriate point where doing so does not prejudice safeguarding, evidence, a police/LADO process or another investigation. They will be given an appropriate opportunity to respond.

14. Deliberately false or malicious allegations

A person will not be disciplined merely because a concern is not substantiated or because an investigation reaches a different conclusion. Whistleblowing protection depends on the legal criteria, including reasonable belief and public interest, not on the whistleblower ultimately being proved correct.

Knowingly fabricating information or making a deliberately malicious allegation may be addressed under disciplinary or other appropriate procedures. This provision must never be used to deter genuine concerns or punish an individual for raising a concern that they reasonably believed to be true.

15. Record keeping and data protection

Whistleblowing records will be kept securely with access restricted to those who need the information. Records should include the disclosure, actions taken, referrals, investigation decisions, outcomes and any steps taken to protect the whistleblower or address retaliation.

Records concerning safeguarding allegations, low-level concerns, employment matters or regulatory referrals will be retained under the applicable safeguarding, personnel and data-retention arrangements. Information will be handled in accordance with UK GDPR and the Data Protection Act 2018.

16. Training, awareness and culture

- all staff will be told how to raise whistleblowing and safeguarding-practice concerns during induction;
- leaders and managers will understand how to receive a disclosure without dismissing, minimising or retaliating against the person raising it;
- staff will be reminded that they are witnesses to possible wrongdoing, not expected to become investigators;
- whistleblowing arrangements will be reinforced through safeguarding training and policy updates;
- Future Pathways will use concerns and themes to strengthen safeguarding, governance, safer recruitment, health and safety and organisational culture.

17. Monitoring and review

Lauren Meston, Managing Director, will ensure this policy is reviewed at least annually and sooner following a significant whistleblowing case, safeguarding review, legal change, KCSIE update or evidence that staff do not feel safe to speak up. Where review of Lauren's own conduct or handling of whistleblowing is required, governance oversight must be provided by an uninvolved Trustee/Director.

Monitoring should focus on themes, timeliness, outcomes, retaliation concerns and organisational learning while protecting confidentiality. The existence of few or no disclosures will not automatically be treated as evidence that the culture is effective; staff confidence to speak up should also be considered.

18. Related Future Pathways policies

- Safeguarding and Child Protection Policy;
- Low-Level Concerns Policy;
- Safer Recruitment Policy;
- Staff Code of Conduct / Safe Working Practice;
- Behaviour Policy;
- Anti-Bullying Policy;
- Inclusion Policy;
- Use of Reasonable Force Policy;
- Online Safety and Mobile Phone Policy;
- Health and Safety Policy;
- Complaints Policy;
- Grievance and Disciplinary procedures;
- Data Protection Policy.

Appendix 1 - Staff quick guide: speaking up

13. If someone is in immediate danger, call 999 and follow safeguarding procedures.
14. Do not investigate the concern yourself or confront a person if this could increase risk.
15. Raise the concern promptly with Lauren Meston or an appropriate line manager.
16. If that route is conflicted, use an uninvolved Trustee/Director or safeguarding alternative route.
17. If the matter concerns adult conduct towards a child, follow the allegations or Low-Level Concerns procedure immediately.
18. Write down the facts, dates and what you have observed or been told. Distinguish fact from opinion.
19. Ask for confidentiality if you want it, but understand it cannot always be guaranteed.
20. If you cannot raise a safeguarding-practice concern internally or it is not being addressed, use the NSPCC Whistleblowing Advice Line or another appropriate external route.
21. Report any retaliation or detriment immediately.
22. Keep organisational and child information secure and do not gather evidence unlawfully.

Appendix 2 - Whistleblowing disclosure record

Field	Record
Date/time concern received	
Name/contact of person raising concern (if provided)	
Role/relationship to Future Pathways	
Confidentiality requested?	Yes / No
How concern was received	Verbal / Email / Letter / Other
Summary of concern	
Who/what is alleged to be involved	
Dates/locations relevant to concern	
Immediate safeguarding or safety risk identified	
Immediate action taken	
DSL/LADO/police/regulator referral required	

Conflict of interest considered	
Person appointed to oversee/investigate	
Whistleblower acknowledgement date	
Progress updates provided	
Outcome/decision and rationale	
Action to prevent recurrence / organisational learning	
Retaliation/detriment concerns	
Record closed by/date	

Appendix 3 - Key external advice and safeguarding contacts

- NSPCC Whistleblowing Advice Line: 0800 028 0285; help@nspcc.org.uk;
- Doncaster LADO: Milovan Orlandich / Tony Dobbs; LADO@doncaster.gov.uk; 01302 737332;
- Acas: current whistleblowing guidance and helpline information at GOV.UK/Acas;
- Protect: independent UK whistleblowing charity and legal advice service;
- Ofsted whistleblowing route where the concern falls within Ofsted's prescribed remit;
- Department for Education whistleblowing route where the setting/type of concern is within DfE jurisdiction;
- Police: 999 for immediate danger; 101 for non-emergency crime reporting where appropriate.

External contact details and legal routes can change. Staff should use current official government/regulator information when making an external disclosure.

Approval

Signed: L. Meston

Lauren Meston - Managing Director, Future Pathways

Date: 17/08/2026

Next review due: 16/08/2027