APEX2100

WHISTLEBLOWING POLICY AND PROCEDURES

Academic Year: 2026–2027
Policy Owner: Apex2100 Education Board
Designated Safeguarding Lead (DSL): Dave Breen
Deputy Designated Safeguarding Leads (DDSLs): Karen Thomas, Stuart Terris and Mark Tilston
Designated Safeguarding Governor / Board Lead: Mike Buchanan
Review frequency: At least annually and sooner where legislation, statutory guidance or organisational arrangements change
Presented to Board: September 2026
Next scheduled review: September 2027

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1. Policy Statement

Apex2100 is committed to maintaining the highest standards of safeguarding, professional conduct, integrity, accountability and openness.
The Academy recognises that staff and other individuals working with or on behalf of Apex2100 may sometimes become aware of serious concerns about the conduct of colleagues, safeguarding arrangements, management decisions, financial matters, legal compliance or other wrongdoing.
Apex2100 encourages individuals to raise genuine concerns at the earliest opportunity.
No person should be prevented from raising a genuine concern because they are worried about the consequences of doing so.
The Academy will ensure that concerns raised under this policy are taken seriously, considered appropriately and dealt with proportionately.
A person who raises a genuine concern in good faith will not be subjected to retaliation, victimisation or detrimental treatment because they have raised the concern.
This policy forms part of Apex2100's wider safeguarding and governance arrangements.

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2. Purpose of the Policy

The purpose of this policy is to:

- provide a clear and confidential route for raising serious concerns;
- encourage individuals to raise concerns before problems become more serious;
- protect individuals who raise genuine concerns;
- ensure concerns are considered fairly and appropriately;
- identify and address poor safeguarding practice;
- identify serious breaches of law, policy or professional standards;
- prevent the concealment of wrongdoing;
- provide routes for escalation where an individual believes their concern has not been properly addressed; and
- support a culture of openness and accountability.

3. Who Can Raise a Concern?

This policy applies to anyone working for or with Apex2100, including:

- employees;
- teachers;
- contractors;
- agency workers;
- volunteers;
- governors and Board members;
- consultants;
- temporary workers;
- visiting professionals; and
- other individuals undertaking work or services on behalf of Apex2100.

The Academy will consider concerns raised by former employees or other individuals where appropriate.
An individual does not need to prove that wrongdoing has occurred before raising a concern. A genuine and reasonable belief that something may be wrong is sufficient to raise a concern.

4. What Is Whistleblowing?

Whistleblowing occurs when an individual raises a concern about serious wrongdoing, malpractice, danger or a failure of proper standards within an organisation.
Examples may include concerns that:

- a child or young person is being placed at risk;
- safeguarding procedures are not being followed;
- safeguarding concerns are being ignored or concealed;
- allegations about adults working with children are not being appropriately managed;
- serious misconduct is occurring;
- criminal activity may have occurred;
- the Academy is failing to comply with legal requirements;
- health and safety requirements are being seriously breached;
- financial wrongdoing, fraud or corruption may be occurring;
- records are being deliberately falsified;
- information is being deliberately concealed;
- serious conflicts of interest are not being declared;
- discriminatory or abusive practices are occurring;
- a person is being instructed to act unlawfully or improperly;
- regulatory requirements are being deliberately ignored; or
- there is a serious and persistent failure of governance or professional standards.

This list is not exhaustive.

5. Whistleblowing and Safeguarding

Apex2100 recognises that whistleblowing can be an important safeguarding mechanism.
A whistleblowing concern may arise where an individual believes that:

- a safeguarding concern has not been reported;
- a disclosure from a child has not been taken seriously;
- safeguarding records are being altered, concealed or improperly managed;
- an allegation against an adult has not been appropriately referred;
- staff are failing to maintain professional boundaries;
- safeguarding training or supervision is inadequate;
- safeguarding risks are knowingly being ignored;
- a child is being placed at avoidable risk;
- safeguarding procedures are routinely not being followed; or
- the Academy's safeguarding leadership is failing to respond appropriately.

Where a concern relates to the immediate safety of a child, the individual must act immediately and must not wait for the whistleblowing process.
The Academy's Safeguarding Children and Child Protection Policy and Procedures must be followed alongside this policy.

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6. Whistleblowing Is Different From Other Concerns
Not every workplace concern constitutes whistleblowing.
Safeguarding concern
A concern about the welfare or safety of a particular child should normally be reported through the safeguarding procedures.
Low-level concern
A concern about an adult's behaviour which does not meet the threshold for a formal allegation should normally be reported through the Low-Level Concerns procedure.
Grievance
A grievance normally concerns an individual's own employment, working conditions or personal treatment.
Complaint
A complaint normally concerns dissatisfaction with a service, decision or action.
Whistleblowing
Whistleblowing concerns normally relate to serious wrongdoing, malpractice, danger, illegality, serious safeguarding failures or matters affecting the wider organisation or public interest.
Where there is uncertainty about which procedure applies, the concern should still be raised. Apex2100 will determine the appropriate route.

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7. Raising a Whistleblowing Concern
An individual should normally raise a concern with:
Mike Buchanan
Chair of Apex2100 Education Board and Designated Safeguarding Governor
Email: mike@positivelyleading.co.uk
Mobile: +44 (0)7941 093 102
Where appropriate, a concern may also be raised with:
Dave Breen
Designated Safeguarding Lead
Telephone: +33 6 69 19 02 82
Email: dave.breen@apex2100.org
Where the concern relates to the DSL, the concern must not be reported to the DSL.

Where the concern relates to the Chair of the Education Board or another person who would ordinarily receive the concern, the individual should use an alternative route, including an appropriate external authority.

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8. Raising a Safeguarding Whistleblowing Concern

Where a person believes that a safeguarding concern is not being appropriately dealt with, they should first raise the concern with the DSL where it is safe and appropriate to do so.
If the concern:

- involves the DSL;
- concerns a failure by the DSL to act;
- has already been raised and has not been adequately addressed;
- concerns a serious failure of safeguarding governance; or
- creates a concern that the normal safeguarding route cannot be relied upon,

the individual should raise the matter directly with the Chair of the Education Board.
Where an individual believes that internal procedures have failed to protect a child, they may also contact the appropriate external safeguarding authority.

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9. External Whistleblowing

Apex2100 recognises that there may be circumstances where an individual does not feel able to raise a concern internally.
Individuals may seek independent advice before deciding how to proceed.
Where appropriate, external routes may include:

- the relevant local authority;
- children's social care;
- the police;
- the Local Authority Designated Officer (LADO);
- Ofsted;
- the Disclosure and Barring Service (DBS);
- the Teaching Regulation Agency (TRA);
- the Department for Education;
- the NSPCC Whistleblowing Advice Line; or
- another relevant regulatory or statutory authority.

Where there is an immediate risk to a child or another person, the emergency services should be contacted without delay.
NSPCC Whistleblowing Advice Line
Telephone: **0800 028 0285**
Email: **help@nspcc.org.uk**
The NSPCC Whistleblowing Advice Line provides advice to people who have concerns about the way child protection issues are being handled in an organisation.

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10. How to Raise a Concern

Concerns may be raised verbally or in writing.
Where possible, the individual should provide:

- a description of the concern;
- what they believe has happened;
- when and where the matter occurred;
- who was involved;
- whether children or other individuals may be at risk;
- any relevant documents or evidence;
- whether the matter has previously been reported;
- who it was reported to; and
- why the individual believes the response has been inadequate.

An individual does not need to investigate the matter themselves.
They should not attempt to obtain evidence through inappropriate or unlawful means.

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11. Anonymous Concerns

Apex2100 will accept anonymous whistleblowing concerns where possible.
However, anonymity can make it more difficult to investigate a concern, obtain clarification or provide feedback.
Individuals are therefore encouraged to identify themselves where they feel able to do so.
The Academy will make reasonable efforts to protect the identity of a person who raises a concern where confidentiality is appropriate and lawful.
Confidentiality cannot be guaranteed where disclosure is required by law or is necessary to protect a child or another person.

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12. Confidentiality

Information relating to a whistleblowing concern will be handled sensitively and shared only where necessary.
The Academy will:

- restrict information to those who need it;
- maintain appropriate records;
- comply with applicable data protection requirements;
- avoid unnecessary disclosure of the identity of the whistleblower; and
- take appropriate steps to protect the integrity of any investigation.

Individuals who receive confidential information as part of a whistleblowing process must not disclose it unnecessarily.

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13. Protection From Detrimental Treatment

Apex2100 will not tolerate retaliation against a person who raises a genuine concern in good faith.
Retaliation may include:

- bullying;
- harassment;
- intimidation;
- victimisation;
- threats;
- exclusion;

- detrimental changes to working arrangements;
- inappropriate disciplinary action;
- threats to employment;
- discrimination; or
- other unfair treatment because a concern has been raised.

Any allegation of retaliation will be taken seriously and may itself be subject to investigation. An individual who deliberately makes a false allegation or knowingly provides false information may be subject to appropriate action.
A genuine concern which is not substantiated will not, by itself, be treated as misconduct.

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14. Receiving and Assessing a Concern
The person receiving a whistleblowing concern will:

1. acknowledge receipt where appropriate;
2. consider whether there is an immediate safeguarding or safety risk;
3. consider whether another statutory procedure must be activated;
4. determine who should oversee the matter;
5. consider whether independent advice is required;
6. determine whether an investigation is appropriate;
7. ensure relevant information and records are preserved;
8. maintain appropriate confidentiality; and
9. keep an appropriate record of actions and decisions.

The Academy will avoid unnecessary delay, particularly where children may be at risk.

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15. Investigation
Where an investigation is required, Apex2100 will seek to ensure that it is:

- fair;
- proportionate;
- objective;
- appropriately independent;
- properly documented; and
- conducted without unnecessary delay.

The person investigating the concern should not have a conflict of interest.
Where the concern relates to senior leadership, the DSL, a Board member or another person with significant authority, the Academy will consider whether an independent investigator or external adviser should be appointed.
The Academy will not undertake an internal investigation where doing so could prejudice a police, safeguarding or regulatory investigation.

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16. Safeguarding and Allegations Against Adults
Where a whistleblowing concern amounts to an allegation that an adult working with children may have:

- harmed a child;

- possibly committed a criminal offence against or related to a child; or
- behaved in a way indicating that they may pose a risk of harm to children,

the matter must be dealt with under the Academy's safeguarding procedures for allegations against adults.
The appropriate safeguarding authority, LADO, police or children's social care service will be contacted where required.
The whistleblowing procedure must not be used to replace or delay statutory safeguarding procedures.

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17. Financial and Other Serious Misconduct
Where a concern relates to suspected fraud, corruption, financial misconduct, falsification of records or other serious organisational wrongdoing, the Academy will determine the appropriate investigation and reporting arrangements.
Where appropriate, external authorities or professional advisers may be involved.
The Academy will take reasonable steps to preserve relevant records and evidence.

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18. Feedback to the Person Raising the Concern
Where it is lawful and appropriate to do so, Apex2100 will provide the person raising the concern with information about the progress and outcome of the matter.
The Academy may be unable to provide detailed information where doing so could:

- breach confidentiality;
- prejudice an investigation;
- interfere with criminal proceedings;
- compromise the privacy rights of another individual; or
- create a safeguarding risk.

The absence of detailed feedback does not necessarily mean that the concern has not been acted upon.

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19. Record Keeping
Apex2100 will maintain appropriate records of whistleblowing concerns.
Records may include:

- the concern raised;
- the date it was received;
- the person receiving the concern;
- actions taken;
- risk assessments;
- referrals;
- decisions;
- investigation records;
- outcomes; and
- any follow-up action.

Whistleblowing records will be stored securely and access will be restricted appropriately.

Records will be retained in accordance with the Academy's data protection and records retention arrangements.

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20. False or Malicious Concerns

Apex2100 recognises that a concern may be raised which is ultimately found to be unfounded.

A concern will not be considered malicious simply because it is not substantiated. However, deliberately false allegations, fabricated evidence or knowingly dishonest information may constitute misconduct and may be dealt with under the appropriate procedure.

The Academy will distinguish carefully between:

- a genuine concern which cannot be substantiated;
- an allegation made in error;
- a concern raised on the basis of reasonable but mistaken information; and
- a deliberately false or malicious allegation.

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21. Responsibilities of the Education Board

The Apex2100 Education Board has overall responsibility for ensuring that appropriate whistleblowing arrangements are maintained.

The Board will:

- promote a culture in which concerns can be raised safely;
- ensure appropriate routes for escalation;
- ensure that serious concerns are appropriately considered;
- maintain appropriate oversight;
- ensure conflicts of interest are managed;
- seek independent advice where necessary; and
- review significant whistleblowing matters and lessons learned where appropriate.

The Board will ensure that whistleblowing arrangements complement, rather than replace, safeguarding procedures.

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22. Responsibilities of the DSL

The DSL will:

- ensure that safeguarding-related whistleblowing concerns are appropriately considered;
- ensure immediate safeguarding action where necessary;
- maintain appropriate records;
- liaise with statutory safeguarding agencies;
- ensure concerns are escalated where necessary;
- identify patterns or systemic safeguarding failures; and
- advise the Education Board on safeguarding implications.

Where the concern relates to the DSL, the DSL will have no role in managing that concern.

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23. Responsibilities of All Staff

All staff and other individuals working with or on behalf of Apex2100 are expected to:

- speak up when they become aware of serious wrongdoing;
- report safeguarding concerns without delay;
- cooperate honestly with appropriate investigations;
- maintain confidentiality;
- avoid conducting their own inappropriate investigation;
- preserve relevant information where appropriate; and
- challenge unsafe or unlawful practice.

Staff must not deliberately conceal safeguarding concerns or serious wrongdoing.

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24. Review of the Policy

This policy will be reviewed at least annually and sooner where:

- legislation changes;
- statutory guidance changes;
- safeguarding arrangements change;
- a significant whistleblowing concern identifies a weakness;
- an investigation identifies lessons to be learned;
- an inspection identifies an area requiring improvement; or
- the Education Board considers a review necessary.

The review will consider whether the policy continues to provide effective, accessible and safe routes for raising concerns.

APPENDIX 1

WHISTLEBLOWING CONTACT SUMMARY

Internal

Mike Buchanan
Chair of Apex2100 Education Board
Designated Safeguarding Governor / Board Lead
Email: mike@positivelyleading.co.uk
Mobile: +44 (0)7941 093 102

Dave Breen
Designated Safeguarding Lead
Telephone: +33 6 69 19 02 82
Email: dave.breen@apex2100.org

DDSLs
Karen Thomas
Email: karen.thomas@apex2100.org
Stuart Terris
Email: stuart.terris@apex2100.org
Mark Tilston
Email: mark.tilston@apex2100.org

External

NSPCC Whistleblowing Advice Line
0800 028 0285
help@nspcc.org.uk
Ofsted
0300 123 4666
Whistleblowing@ofsted.gov.uk
Disclosure and Barring Service
03000 200 190
dbsdispatch@dbs.gov.uk
Teaching Regulation Agency
0207 593 5393
misconduct.teacher@education.gov.uk
Emergency services
Where there is an immediate risk of harm, contact the appropriate emergency service without delay.

@Apex2100

