

WHISTLEBLOWING POLICY

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of the school. All our school policies support our approach to safeguarding (pupil protection). Our fundamental priority is our pupils and their wellbeing; this is first and foremost.

Whole-School Safeguarding Commitment

The College adopts a whole-school approach to safeguarding, which is the golden thread running through every aspect of College life. All College policies support this safeguarding framework. The welfare and wellbeing of pupils is the College's paramount consideration.

This Whistleblowing Policy supports the safeguarding culture of the College by enabling concerns about wrongdoing, unsafe practice, malpractice, or failures in leadership or systems to be raised openly, confidentially, and without fear of reprisal.

Scope

This policy applies to:

- All teaching and support staff
- Volunteers
- Supply staff
- Students on placement
- Contractors and consultants
- The Principal
- The Proprietor's Agent
- Members of the Governance Advisory Committee

The policy applies during and outside normal College hours, including activities taking place off-site or outside the usual working environment.

All new employees, volunteers, and relevant third parties are required to confirm that they have read, understood, and agree to comply with this policy.

Legal Status and Regulatory Framework

This policy complies with:

- The Public Interest Disclosure Act 1998 (PIDA)
- The Education (Independent School Standards) (England) Regulations
- Keeping Children Safe in Education (KCSIE)

A **protected disclosure** under PIDA is a disclosure of information made in the public interest, where the individual reasonably believes the information tends to show wrongdoing.

Individuals who make protected disclosures **in good faith** are protected from victimisation, dismissal, or other detriment, even where concerns are not substantiated, provided they were raised honestly and reasonably.

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Monitoring and Review

This policy is subject to continuous monitoring, refinement, and audit by the Principal.

The Proprietor and the Governance Advisory Committee will undertake a full annual review of this policy, including its implementation and effectiveness. This review will be formally documented.

Any deficiencies identified will be addressed immediately and without delay.

Definition of Whistleblowing

Whistleblowing is the disclosure of information by a worker or volunteer which they reasonably believe demonstrates wrongdoing in the public interest.

The concern must relate to one or more of the following:

- A criminal offence
- Failure to comply with a legal obligation
- A miscarriage of justice
- Health and safety risks
- Environmental damage
- Financial malpractice, fraud, or misuse of funds
- Corruption, abuse of authority, or unethical conduct
- Failure to safeguard and promote the welfare of children
- Deliberate concealment of any of the above

Concerns may relate to past events, current practices, or potential future risks.

Concerns relating solely to an individual's personal employment circumstances should normally be raised via the Grievance or Complaints Procedure unless there is a wider public interest.

Safeguarding Priority Statement

Safeguarding concerns must be reported immediately and on the same day they arise and must never be delayed by whistleblowing procedures.

Where a concern indicates that a child or vulnerable person may be at risk of harm:

- The Child Protection Policy must be followed immediately
- Concerns must be reported directly to the Designated Safeguarding Lead (DSL) or Deputy DSL
- External agencies must be contacted without delay where required

Whistleblowing procedures do not replace child protection responsibilities.

Key Safeguarding and Governance Contacts

Designated Safeguarding Lead (DSL) / Head of Safeguarding

Nedaa Belal

Deputy DSL

As published in the Child Protection Policy

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Chair of the Governance Advisory Committee

Jill Bainton

Aims of the Policy

This policy aims to:

- Encourage the reporting of concerns at the earliest opportunity
- Provide clear guidance on how to raise concerns
- Reassure staff and others that genuine concerns will be taken seriously
- Protect whistleblowers from victimisation or reprisal
- Ensure appropriate investigation and resolution of concerns
- Promote a culture of openness, accountability, safeguarding, and continuous improvement

Protection for Whistleblowers

The College will not tolerate harassment, victimisation, or retaliation against any individual who raises a concern in good faith.

Support and protection will be provided even where concerns are not ultimately substantiated, provided they were raised honestly and reasonably.

Whistleblowing investigations will be managed **separately from disciplinary, capability, or performance management processes**, unless evidence indicates that disciplinary action is required.

Disciplinary action may be taken where allegations are found to be deliberately malicious, vexatious, or knowingly false.

Right to Representation and Advice

Individuals raising concerns have the right to:

- Be accompanied at meetings by a trade union representative or workplace colleague
- Seek independent and confidential advice at any stage, including from recognised whistleblowing support organisations

Seeking advice does not breach confidentiality obligations.

Confidentiality

All disclosures will be treated sensitively and confidentially.

The identity of the whistleblower will be protected where possible, though it may be necessary to disclose this as part of an investigation or legal process. This will be discussed with the individual in advance wherever possible.

Anonymous Disclosures

Anonymous disclosures are not discouraged.

They will be assessed based on:

- The seriousness of the issue
- Safeguarding implications

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- Credibility and detail of the information provided
- Likelihood of corroboration

Safeguarding-related anonymous disclosures will always be considered.

How to Raise a Concern

Concerns may be raised verbally or in writing. Individuals are encouraged to provide as much detail as possible, including dates, times, and names, but are not required to prove the concern.

Individuals must not investigate concerns themselves or confront others directly.

Reporting Routes

Immediate safeguarding risk

- Report immediately to the DSL or Deputy DSL
- Contact emergency services where necessary

Concerns about staff conduct, practice, or systems

- Raise with a member of the Senior Leadership Team or the Principal

Concerns involving the Principal

- Raise directly with the Chair of the Governance Advisory Committee

Concerns involving the Proprietor or the Proprietor's Agent

- Raise directly with the Chair of the Governance Advisory Committee
- Where appropriate, concerns may also be raised with an external body

Where internal reporting is not appropriate

- Raise concerns directly with an appropriate external whistleblowing body

External Whistleblowing Routes

External bodies include (but are not limited to):

- NSPCC Whistleblowing Helpline – 0800 028 0285
- Local Authority Designated Officer (LADO)
- Department for Education
- Ofsted or relevant regulator
- Health and Safety Executive
- Environment Agency
- Acas

How the College will Respond

All concerns will be acknowledged within ten working days.

Initial enquiries will determine whether an investigation is required and what form it should take.

Investigations may involve:

- Internal investigation
- External audit

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- Referral to safeguarding agencies
- Referral to the police or regulators
- Independent external inquiry

The whistleblower will be kept informed of progress and outcomes where legally permissible.

Records, Learning and Improvement

A confidential whistleblowing register will be maintained, recording concerns raised, actions taken, and outcomes.

Records will be reviewed to:

- Identify patterns or systemic issues
- Inform safeguarding practice and risk management
- Support continuous improvement of policies and procedures

Governance, Independence and Oversight

The Principal is responsible for the operational handling of whistleblowing concerns.

The Chair of the Governance Advisory Committee provides independent oversight and is the escalation point for concerns involving:

- The Principal
- The Proprietor
- The Proprietor's Agent
- Governance or leadership arrangements

Where concerns involve both the Proprietor and governance oversight, or where internal routes are not appropriate, individuals are encouraged to report directly to an external authority.

Training and Awareness

All staff and volunteers receive whistleblowing training as part of induction.

Ongoing safeguarding and compliance training reinforces whistleblowing responsibilities.

This policy is available to staff, parents, pupils, and the wider community. Parents and pupils wishing to raise concerns are normally directed to the Complaints Policy, unless the matter raises a wider public interest concern.

Review and Document Control

This policy is reviewed annually or sooner where required by legislation, guidance, or best practice.

Reviewed: January 2026

Next Review: January 2027

Approved by: Proprietor and Governance Advisory Committee

Signed:

John Dalton

Principal

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