



Reconnect Learning — Whistleblowing Policy

Version 1.0 | Policy Owner: Ellen Kerr | Approved: September 2026 | Effective: September 2026 | Review: September 2027

KCSIE 2026 ALIGNED

OFSTED READY

FULLY COMPLIANT

1. Policy Statement

Our Commitment

Reconnect Learning is committed to maintaining the highest standards of honesty, integrity, accountability and safeguarding.

We encourage all staff, tutors, volunteers, contractors and associates to raise concerns where they believe wrongdoing, misconduct, unlawful activity or risks to children, young people, staff or the organisation may exist.

Our Culture

Reconnect Learning is committed to creating a culture where individuals feel safe to speak up without fear of victimisation, discrimination, harassment or detriment.

- ✔ All concerns raised in good faith will be taken seriously and investigated appropriately.



2. Purpose

This policy exists to foster a culture of openness, accountability and safety across Reconnect Learning.



Encourage Reporting

Encourage individuals to report concerns without hesitation or fear.



Protect Individuals

Protect individuals who raise genuine concerns in good faith.



Support Safeguarding

Support safeguarding responsibilities and prevent harm to learners, staff and the organisation.



Legal Compliance

Meet legal and regulatory requirements and ensure concerns are investigated appropriately.

3. Scope

This policy applies to all individuals working with or on behalf of Reconnect Learning, regardless of their employment status, length of service or contract type.

Who Is Covered

Employees

Tutors

Volunteers

Agency Workers

Contractors

Consultants

Governors / Trustees

Applies Regardless Of

Length of Service

New starters and long-serving staff alike are covered.

Employment Status

Full-time, part-time, casual and zero-hours workers.

Contract Type

Permanent, fixed-term, freelance or agency arrangements.

4. Legal Framework

This policy is informed by a robust body of UK legislation and statutory guidance, ensuring full legal compliance and alignment with current regulatory expectations.

Statutory Guidance

- 1

Keeping Children Safe in Education (KCSIE) 2026

Statutory safeguarding guidance for all organisations working with children.
- 2

Working Together to Safeguard Children 2026

Multi-agency safeguarding framework and responsibilities.

Primary Legislation

- 1

Public Interest Disclosure Act 1998 (PIDA)

The primary legislation protecting whistleblowers in the UK.
- 2

Employment Rights Act 1996

Underpins employment protections for those raising concerns.
- 3

Children Act 1989 & Children Act 2004

The legislative foundation for child protection and safeguarding duties.
- 4

Equality Act 2010

Protecting individuals from discrimination in the workplace.
- 5

Human Rights Act 1998

Upholding fundamental rights throughout the whistleblowing process.
- 6

Data Protection Act 2018 & UK GDPR

Governing how personal data is handled throughout any investigation.

This policy should be read alongside Reconnect Learning's Safeguarding and Child Protection Policy, which is the organisation's overarching safeguarding policy.

5. What Is Whistleblowing?

Whistleblowing occurs when an individual raises a concern about wrongdoing, malpractice or risks occurring within an organisation.

A Whistleblowing Concern Usually Affects:

- Learners
- Staff
- The public
- The organisation
- Legal compliance



Important Distinction

Whistleblowing differs from a personal grievance. A personal grievance relates to an individual's own employment circumstances — such as pay, working conditions or personal treatment — and is handled separately under the Grievance Policy.

Speaking up is not just a right — it is a professional responsibility that protects learners, colleagues and the organisation.



6. Concerns That Should Be Reported

Concerns may include, but are not limited to, the following categories. Any individual who is uncertain whether their concern qualifies is encouraged to raise it anyway.

Safeguarding



- abuse
- neglect
- exploitation
- poor practice
- failure to act

Abuse, neglect, exploitation, poor practice, failure to act.

Conduct



Professional misconduct, policy breach, unethical behavior, abuse of position.

Health and Safety



- unsafe practices
- failure to manage risks
- serious breaches

Unsafe practices, failure to manage risks, serious breaches.

Financial



- fraud
- theft
- financial misconduct
- misuse of funds

Fraud, theft, financial misconduct, misuse of funds.

Legal and Regulatory



- criminal activity
- data breaches
- discrimination
- equality breaches

Criminal activity, data breaches, discrimination, equality breaches.

Other Serious Concerns



- covering up wrongdoing
- deliberate misinformation
- serious malpractice

Covering up wrongdoing, deliberate misinformation, serious malpractice.

6a. Safeguarding & Conduct Concerns

Safeguarding Concerns



Abuse

Any form of physical, emotional, sexual or psychological abuse.



Neglect

Failure to meet the basic needs of a child or vulnerable person.



Exploitation

Including criminal exploitation and county lines concerns.



Poor Safeguarding Practice

Failure to follow or act on safeguarding procedures.

Conduct Concerns



Professional Misconduct

Behaviour falling below expected professional standards.



Unethical Behaviour

Actions that compromise integrity or professional ethics.



Breaches of Policy

Failure to comply with organisational policies and procedures.



Abuse of Position

Misuse of authority, trust or professional relationships.

6b. Financial, Legal & Other Serious Concerns

Financial Concerns

- Fraud
- Theft
- Financial misconduct
- Misuse of funds

Legal & Regulatory Concerns

- Criminal activity
- Breaches of legislation
- Data protection breaches
- Discrimination
- Equality breaches

Health & Safety Concerns

- Unsafe working practices
- Failure to manage risks
- Serious breaches of health and safety requirements

Other Serious Concerns

**Covering Up
Wrongdoing**

**Deliberate
Misinformation**

Serious Malpractice

7. Safeguarding Concerns

 **Immediate Action Required** — Safeguarding concerns must always be reported immediately. No member of staff should delay reporting a safeguarding concern under any circumstances.

Where a concern relates to child abuse, neglect, exploitation, radicalisation or harm to a child, the concern must be reported in accordance with the **Safeguarding and Child Protection Policy**.

Child Abuse

Report immediately — do not investigate independently.

Neglect

Any suspected neglect must be escalated without delay.

Exploitation

Including county lines and criminal exploitation concerns.

Radicalisation

Refer via Prevent procedures as appropriate.

 Safeguarding concerns will always take priority over normal reporting procedures.

8. Low-Level Concerns

Reconnect Learning recognises the importance of identifying concerns at an early stage, before they escalate into more serious issues.

Low-Level Concerns May Include:

Behaviour Inconsistent with the Staff Code of Conduct

Actions that do not meet expected professional standards but may not yet constitute misconduct.

Boundary Issues

Concerns about professional boundaries with learners or colleagues.

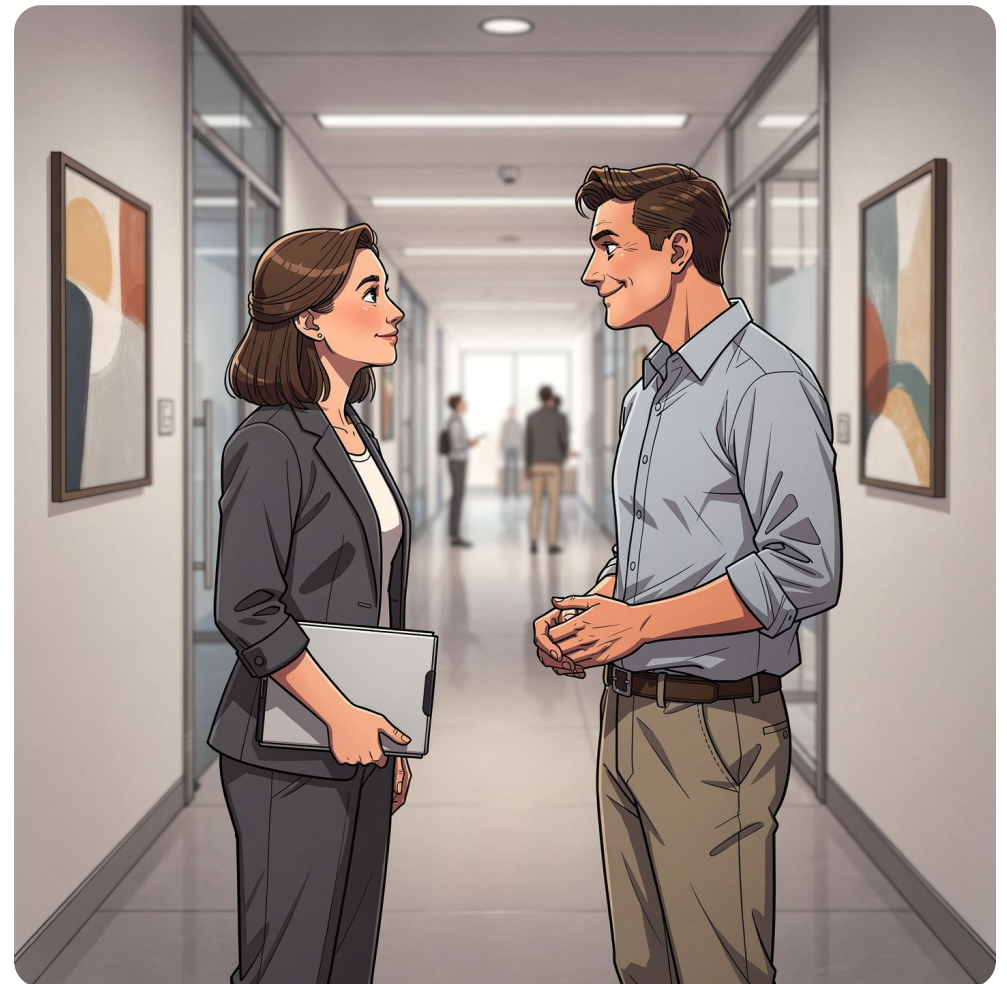
Inappropriate Communication

Messages or interactions that cause professional concern.

Conduct Causing Professional Concern

Any behaviour that, while not immediately serious, warrants attention.

i Low-level concerns should be reported and managed in accordance with the **Low-Level Concerns Policy**. Early reporting helps prevent escalation and protects both learners and staff.



9. Speaking Up — How to Raise a Concern

Individuals are encouraged to raise concerns as soon as possible. Concerns may be raised even where evidence is incomplete.



You do not need to have all the answers before speaking up. Raising a concern early — even with limited information — allows Reconnect Learning to assess and respond appropriately, protecting learners and staff.

10. Anonymous Disclosures

Anonymous Concerns Are Accepted

Reconnect Learning will consider anonymous disclosures. However, anonymous reporting may make investigation more difficult.

Factors Considered Include:

- Seriousness of the concern
- Credibility of the information
- Availability of evidence
- Safeguarding risks



Safeguarding Priority

Anonymous concerns involving safeguarding will always be considered, regardless of the level of detail provided. The welfare of children takes precedence.

Where possible, individuals are encouraged to identify themselves when raising a concern. This allows Reconnect Learning to communicate findings and provide feedback on the outcome of any investigation.

11. Protection for Whistleblowers

Reconnect Learning is committed to protecting every individual who raises a genuine concern in good faith.



No Victimisation

Individuals will not be victimised for raising a concern.



No Discrimination

No individual will face discrimination as a result of speaking up.



No Retaliation

Retaliation of any kind will not be tolerated.



No Harassment

Harassment of a whistleblower is a disciplinary matter.



Any attempt to victimise a whistleblower may result in disciplinary action up to and including dismissal.

12. Confidentiality

Reconnect Learning will seek to maintain confidentiality wherever possible throughout the whistleblowing process.

Information Will Only Be Shared Where:

Necessary for Investigation

To enable a thorough and fair investigation to take place.

Required by Safeguarding

Where safeguarding procedures require disclosure.

Required by Law

Where legal obligations mandate disclosure.

To Protect Individuals

Where disclosure is necessary to prevent harm.

❏ Important Notice

Absolute confidentiality cannot be guaranteed in all circumstances. Where disclosure is necessary, it will be handled sensitively and with due regard to the individual's wellbeing.



13. Investigation Process

Upon receipt of a concern, Reconnect Learning will follow a structured three-stage investigation process to ensure concerns are handled fairly, thoroughly and proportionately.



Stage 1 — Initial Assessment

The concern will be reviewed to determine the nature of the concern, any immediate risks, safeguarding implications and the appropriate course of action.



Stage 2 — Investigation

Where appropriate, evidence will be gathered, individuals may be interviewed, records may be reviewed and external agencies may be consulted.



Stage 3 — Outcome

Appropriate action may include no further action, policy review, additional training, disciplinary action, referral to external agencies or safeguarding action.

14. External Reporting

Individuals may report concerns externally where appropriate. The following organisations may be relevant depending on the nature of the concern.

1

LADO

Local Authority Designated Officer — where concerns involve staff conduct towards children.

2

Children's Social Care

Where safeguarding concerns about a child exist and require statutory intervention.

3

Police

Where criminal activity is suspected and requires immediate law enforcement involvement.

4

ICO

Information Commissioner's Office — where serious data protection concerns exist.

5

HSE

Health and Safety Executive — where significant health and safety breaches exist.



NSPCC Whistleblowing Advice Line — Independent advice for professionals concerned about how safeguarding concerns are being handled.

Phone: 0800 028 0285 | **Email:** help@nspcc.org.uk

15. Malicious Allegations & 16. Record Keeping

15. Malicious Allegations

Reconnect Learning encourages genuine concerns to be raised. However, deliberately false or malicious allegations may result in:

- Disciplinary action
- Referral to appropriate agencies where necessary

✓ A concern raised in good faith will **not** be treated as malicious simply because it is not substantiated following investigation.

16. Record Keeping

Reconnect Learning will maintain records of all concerns raised, investigations completed, actions taken, outcomes identified and learning points.

Confidential

All records are treated as strictly confidential.

Securely Stored

Records are held in secure systems with restricted access.

GDPR Compliant

Managed in accordance with the Data Protection Act 2018 and UK GDPR.

17. Training & Awareness

All staff will receive information and training to ensure they understand their responsibilities and feel confident to raise concerns.



Whistleblowing Procedures

How to raise a concern, who to contact and what to expect.



Safeguarding Reporting

Statutory safeguarding duties and reporting pathways.



Low-Level Concerns

Recognising and reporting early-stage concerns.



Professional Conduct

Expectations under the Staff Code of Conduct.



KCSIE Requirements

Keeping Children Safe in Education 2026 obligations.

Training records will be maintained and reviewed as part of the annual monitoring process.

Induction Arrangements

Reconnect Learning will ensure that all new staff, tutors and volunteers are made aware of the Whistleblowing Policy during induction and know how to access external reporting routes if required.

18. Child-Centred Safeguarding Culture

The welfare of children is everyone's responsibility.

Reconnect Learning is committed to creating a safeguarding culture where every member of the organisation plays an active role in protecting learners.

Learners Are Protected

The safety and wellbeing of every learner is the highest priority.



Concerns Are Acted Upon

No concern is dismissed — all are taken seriously and responded to.



Staff Feel Empowered

Every member of staff feels safe and supported to speak up.



Challenge Is Welcomed

Professional challenge is encouraged and valued at all levels.



19. Monitoring & Review

The Managing Director Will Monitor:

- Concerns raised
- Investigation outcomes
- Safeguarding themes
- Training completion
- Policy effectiveness

This Policy Will Be Reviewed:

This policy will be reviewed annually and without unnecessary delay following changes to legislation, statutory guidance, safeguarding practice, organisational arrangements or learning identified through whistleblowing concerns, investigations, audits or significant incidents.

20. Related Policies

This policy should be read alongside the following Reconnect Learning policies to ensure a comprehensive understanding of safeguarding, conduct and reporting responsibilities.

Safeguarding and Child Protection Policy

Low-Level Concerns Policy

Managing Allegations Against Staff Policy

Staff Code of Conduct

Complaints Policy

Data Protection & GDPR Policy

Behaviour Policy

Safer Recruitment Policy

Risk Assessment Policy

Online Safety Policy

Prevent Duty and Radicalisation Policy

21. Contact Details

Whistleblowing Lead

Name: Ellen Kerr

Position: Managing Director & Designated Safeguarding Lead (DSL)

Organisation: Reconnect Learning

Email: info@reconnectlearning.co.uk

⊗ Safeguarding concerns should be reported immediately in accordance with safeguarding procedures — do not delay.

External Support

NSPCC Whistleblowing Advice Line

Independent advice for professionals concerned about how safeguarding concerns are being handled.

Phone: 0800 028 0285

Email: help@nspcc.org.uk

If you are unsure whether your concern qualifies as a whistleblowing matter, contact Ellen Kerr in the first instance. All enquiries will be treated with sensitivity and discretion.

Version Control & Compliance Status

Version	Date	Author	Changes
1.0	September 2026	Ellen Kerr	Initial Issue

Approved By: Ellen Kerr | **Position:** Managing Director, Reconnect Learning | **Date Approved:** September 2026 | **Review Date:** September 2027

Compliance Status

This policy has been developed with regard to the relevant legislation, statutory guidance and governance expectations applicable at the date of approval.

PIDA 1998	Employment Rights Act 1996	Children Act 1989 & 2004
Equality Act 2010	Human Rights Act 1998	Data Protection Act 2018 & UK GDPR
KCSIE 2026	Working Together to Safeguard Children 2026	Ofsted AP Expectations
LA Provider Standards		