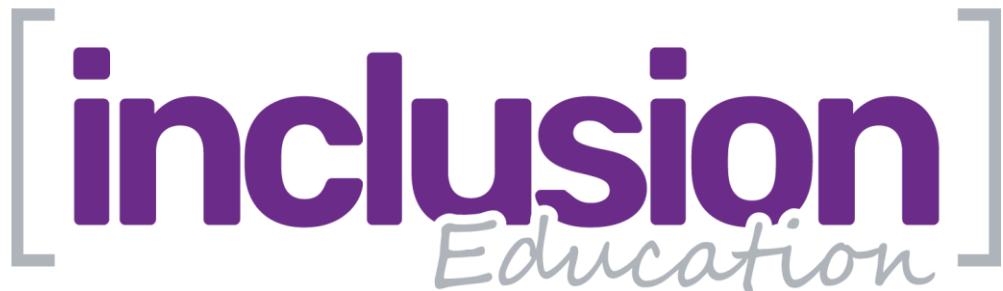


Whistleblowing Policy



Approved by: Amanda Minshull-Beech

Date: September 2025

Signed: *AM Minshull - Beech*

Position: Chair of Trustee Board

Last review: September 2025

Next review by: September 2027

Monitoring arrangements

This policy will be reviewed bi-annually but may be reviewed earlier if deemed appropriate. The Trustees are responsible for ensuring the implementation of this policy and that regular reviews take place.

Author: Emma Connolly	Title: Whistleblowing	Ref: IE-HR04-05	Date: Sept 25
Inclusion Education is the working name of Inclusion Hampshire CIO registered number 1162711			

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1. Aims, Scope and Principles

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy applies to all staff at Inclusion Education (Inclusion Hampshire CIO) and its provisions; Inclusion Schools, Inclusion College and EB8, collectively referred to as "Inclusion Education."

This policy covers all Employees, consultants, contractors, volunteers, interns, casual workers and agency workers.

This policy does not form part of any Employee's contract of employment, and we may amend it at any time.

This policy aims to

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected
- Let all staff in the organisation know how to raise concerns about potential wrongdoing in or by the organisation
- Set clear procedures for how the organisation will respond to such concerns
- Let all staff know the protection available to them if they raise a whistle-blowing concern
- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy, even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue).

2. Legislation

This policy has been written in line with [government guidance on whistleblowing](#). We also take into account the [Public Interest Disclosure Act 1998](#).

3. What is Whistleblowing

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Pupils' or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment.

A whistle-blower is a person who raises a genuine concern relating to the above.

Not all concerns about the organisation, or individual settings in the organisation, count as whistleblowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance.

When staff have a concern, they should consider whether it would be better to follow our staff grievance procedures.

Protect (formerly Public Concern at Work) has:

- [Further guidance](#) on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential [advice line](#)

4. How to raise a concern

Staff should report their concern to their head of provision, the CEO or COO. If the concern is about the head of provision, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern directly to the CEO or the Chair of Trustees.

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

5. Investigating a concern

When a concern is received by the head of provision, CEO, COO, Trustee – referred to from here as the 'recipient' – they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 7 of this policy)
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The recipient should then arrange a further investigation into the matter, involving the [CEO, local governing bodies and/or chair of trustees] if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police
 - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.

6. Outcome of the Investigation

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, the CEO, trustees and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

7. Malicious or Vexatious Allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern. If, however, an allegation is shown to be deliberately invented or malicious, the organisation will consider whether any disciplinary action is appropriate against the person making the allegation.

8. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

9. External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace.

The trust encourages staff to raise their concerns internally, in line with section 4 of this policy, but recognises that staff may feel the need to report concerns to an external body. A list of prescribed bodies to whom staff can raise concerns with is included [here](#).

The Protect advice line, linked to in section 3 of this policy (and detailed at the end of this policy in Section 11), can also help staff when deciding whether to raise the concern to an external party.

10. Protection and Support for Whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your Line Manager, the CEO or a Trustee immediately. If the matter is not remedied, you should raise it formally using our grievance procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

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

11. Contacts

CEO	Cheryl Edwards 01256 760800 cheryl.edwards@inclusioneducation.org.uk
Chair of Trustees	Amanda Minshull-Beech Via The Clerk 01256 760800 Sally.foster@inclusioneducation.org.uk
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 Website: <u>Protect - Speak up stop harm - Whistleblowing Homepage (protect-advice.org.uk)</u>

12. Reference to other Policies

This policy refers to the following policies:

- Disciplinary Policy.
- Grievance Policy.