



The NEST
alternative
provision
www.thenest-ed.uk

Whistleblowing Policy

Date written:	August 2025
Written by:	Joy Iliff
Date reviewed:	n/a
Reviewed by:	n/a
Approved on:	6 th September 2025
Review date:	August 2026
Substantive changes since last review:	-

Contents

Policy aims	3
Links to legislation and guidance.....	3
Associated policies and further reading	3
Definitions	3
Roles and Responsibilities	3
Directors	3
Whistleblowers	4
Investigator	4
Community voice	4
Processes	5
Raising a concern	5
Examples of whistleblowing concerns	5
Anonymous concerns	5
Serious concerns/concerns with a Director	6
Responding to a concern	6
Preliminary enquiries.....	6

Investigation.....	6
Timescale	6
Outcomes	6
Notification of Outcome.....	7
Escalating concerns	7
Support	7
Record keeping and information sharing	8
Record keeping.....	8
Confidentiality	8
Review.....	8
Appendices.....	9
Appendix A – Community Contract – Staff	9
Appendix B – Key Contacts	9
Internal contacts	9
External contacts	9
Appendix C – Essential Complaint Information	9

Policy aims

It is essential that staff, learners, caregivers and collaborators have the opportunity to raise genuinely held concerns about any area of the NEST's practices. We want to hold the NEST to the highest standards of probity as an organisation. All stakeholders are encouraged to raise any concerns internally as the first step but there must be a system whereby if the solution is not sufficient from Directors that concerns can be escalated. We want to approach serious complaints with openness and an eagerness to learn.

Links to legislation and guidance

This policy has been written in compliance with the following legislation and guidance:

- Public Interest Disclosure Act 1998
- Public Concern at Work
- Keeping children safe in education 2024

Associated policies and further reading

This policy should be read in conjunction with the following associated policies and documents:

- Community Contract – Staff
- Complaints Policy
- Managing Allegations Against Staff Policy
- Safeguarding and Child Protection Policy

Definitions

Whistleblowing – raising a concern, within the workplace or externally, about a danger, risk, malpractice or wrongdoing which affects others. Primarily related to abuses of power and trust towards learners, other vulnerable people, members of the community in or out of work.

Whistleblower – any staff, learner, caregiver, collaborator or member of the public with genuine concerns about the NEST, a member of staff or collaborator.

Roles and Responsibilities

Directors

Directors are responsible for creating an environment in which fosters mutual accountability and supports whistleblowers. It is their responsibility to:

- Ensure no one is penalised for raising legitimate concerns by the NEST or anyone in our community
- Maintain anonymity where possible giving anonymous ways to report.
- Foster a culture where whistleblowers feel confident in raising concerns
- Fully consider and investigate concerns and actions taken as appropriate
- Ensure whistleblowers receive feedback on any action taken
- Inform whistleblowers how they can take matters further if not satisfied
- Ensure whistleblowing concerns are recorded and reported to any relevant organisations

Whistleblowers

Whistleblowers are responsible for reporting concerns in a way that feels safe for them by knowing the routes to do so. It is their responsibility to:

- Report concerns they have when they feel there is reasonable cause to
- Not report concerns maliciously
- Engage with internal/external actions to address any concerns – by attending meetings and/or participating in any investigation
- Be aware of the whistleblowing and complaints procedure and follow these where possible

See Managing Allegations Against Staff Policy, Complaints Policy and Appendix A Community Contract – Staff for more information.

Investigator

For each case of whistleblowing an investigator will be assigned. It is their responsibility to:

- Record all evidence and communication related to the complaint
- Investigate the complaint
- Communicate with all stakeholders, so they are as informed as possible
- Seek advice from relevant experts as necessary

See Appendix B for list of Key Contacts for different types of concern.

Community voice

We value lived experience at the NEST, and we believe that centring the voice of lived experience is a route to better care. The insight of learners, caregivers, staff and collaborators are invaluable in shaping an environment of trust, collaboration and co-ownership. Intentionally prioritising the perspective of learners and caregivers supports educator understanding of learner needs and can empower learners to contribute to meaningful decision making and to take

an active role in their learning. Valuing staff and collaborator feedback can facilitate closer co-working and productive communication.

Feedback will be sought from all people who have used the whistleblowing procedure to inform decisions and drive improvement. All members of the community will have access to an anonymous route for digital feedback on all processes and policies.

Processes

Raising a concern

Concerns can be raised either by an individual or a group. If a collective concern is raised all whistleblowers should be prepared to give their own account during any necessary investigation.

Wherever possible whistleblowers should initially raise concerns openly with a Director. Concerns may be raised verbally or in writing (see Appendix C – Essential Complaint Information). A whistleblower is not expected to provide proof of their concern but provide sufficient reason for suspicion to support their concern.

Examples of whistleblowing concerns

- Breaking the law – likely to break it
- Something that will stop us being able to comply with our legal obligation
- Fraud corruption misuse of funds or resources
- Miscarriages of justice
- H and S risks
- Service provision concerns
- Safeguarding/child protection
- Unethical/unprofessional conduct
- Deliberate concealment of information related to the above

Concerns relating to an individual's own employment should be raised through the Complaints Policy.

Anonymous concerns

Whistleblowers are encouraged to raise concerns openly (since this ensures the concern can be thoroughly addressed with communication), but we acknowledge there may be reasons to seek anonymity. We provide an option to anonymously report safeguarding and whistleblowing concerns digitally (see Appendix C for what needs to be included in a concern).

Serious concerns/concerns with a Director

Where there are serious systemic concerns or a concern involves a Director complaints may be raised with the relevant external organisation (Appendix B – Key Contacts). Where Directors have concerns these should be immediately reported to the relevant external organisation. Safeguarding concerns should be raised according to our Safeguarding Policy. Sometimes it may not be appropriate for the person who receives the concern to continue with its investigation, in these cases they will also be sent straight to the relevant external organisation.

Responding to a concern

Preliminary enquiries

Preliminary enquiries may be required to decide an appropriate response. This may involve discussion with the whistleblower. Where possible concerns will be resolved informally by agreeing an action without need for formal investigation.

Investigation

Where impossible to resolve the concern informally, an investigator will be assigned (usually the person who received the concern – see above). They will investigate the veracity of the concern through informal and formal interviews with stakeholders and reviewing evidence (e.g. CCTV footage), seeking support as necessary. They will keep the whistleblower informed as appropriate (see below). They will liaise with Directors and external agencies as relevant.

Timescale

There is no time limit for raising a concern – however whistleblowers are encouraged to as soon as possible since it may be difficult to address a concern if significant time has elapsed.

Within 10 working days of receipt of a concern the investigator contacts the whistleblower:

- Acknowledgement of receipt of the concern
- Introducing themselves as the investigator
- If further investigation or referral to an external organisation will be made
- Estimate of the length of the investigation
- If the investigator needs further information and how this will be solicited

Outcomes

Potential outcomes of an investigation include:

- Internal management or disciplinary investigation
- Action under relevant NEST policy

- Referral to regulatory body or other relevant external organisation
- Referral to the police

Where it is deemed that no further action is required this can be because:

- There is no evidence that malpractice/misdoing has/is/will occur
- The concern is/has been dealt with under another NEST policy
- The concern is/has been referred to an external agency or police
- The concern was false or malicious

Notification of Outcome

The NEST recognises that a whistleblower would generally prefer to know that a concern has been fully addressed. Wherever possible, they will be informed of the outcome of the concern. Where it is not appropriate or permissible to share this information (e.g. legal / disciplinary or regulatory authority action is pending, sharing information infringes the duty of confidence owed to a third party), the whistleblower will be advised that the concern has been addressed or concluded as far as is practicable. When the whistleblowing procedure is complete, the whistleblower will be informed in writing.

Escalating concerns

If after investigation the whistleblower feels the concern has not been fully/appropriately resolved or that concerns are ongoing they may escalate the issue to ... This should be done only when all internal options have been exhausted, and the whistleblower must take all reasonable steps to maintain confidential and privileged information is not shared.

Support

The NEST wishes to provide as much support to whistleblowers as feasible:

- Whistleblowers and the subjects of whistleblowing who are staff can access counselling through the NEST to support them during or after the whistleblowing process.
- If whistleblowers or subjects of whistleblowing are not staff, they will be encouraged to seek support as appropriate.
- If a whistleblower or subject of whistleblowing would feel safer or more confident with an additional supportive individual, they can bring an approved, appropriate adult (see Complaints Policy).
- Whistleblowers with reasonable suspicion must not be discriminated against, harassed or victimised. If a whistleblower believes they have been subject to any of these, they should report it to Directors or relevant external organisation (Appendix B – Key Contacts) as relevant. This will then be dealt with through staff Code of Conduct.

- Any concerns which prove to have been maliciously or as an offence (e.g. bribery or corruption) raised will be investigated. The outcome of such an investigation may involve engaging in disciplinary processes (see Managing Allegations Against Staff Policy).
- No action will be taken against staff where concerns raised are subsequently unproven.

Record keeping and information sharing

Record keeping

All meetings will be minuted and the minutes will be made available to the whistleblower. All records will be confidential and processed according to our Data Protection Policy. An anonymised record including a summary of the concern, action taken and outcome will be kept for review and reporting.

Confidentiality

If a whistleblower informs the NEST, confidentiality can mostly be maintained. The NEST make every effort and consideration to maintaining confidentiality (e.g. off-site meetings). In cases where it is not possible to maintain confidentiality (e.g. police investigation), the whistleblower is advised their confidentiality cannot be guaranteed.

Training

Staff induction includes an introduction to this policy and processes and clear direction to find the different whistleblowing routes. All staff training is logged and stored in our staff records.

Review

This policy will be reviewed annually at a minimum. Updated policies will be made available locally and on our website (www.thenest-ed.uk). Ad hoc amendments will be made as new information becomes available and to align with any legislative changes as they arise. Stakeholder feedback, particularly that of learners and caregivers, will be invited and incorporated as much as is practicable. Where quantitative data are available these will be analysed and embedded in policies updates.

The following will be analysed:

- Community confidence in and feedback on policy/process
- Number and types of concerns and outcomes
- Complaints of victimisation
- Failures to maintain confidentiality
- Litigation

Appendices

Appendix A – Community Contract - Staff

Appendix B – Key Contacts

Internal contacts

Aoife Healy (Director)	0118 499 2762	aoife@thenest-ed.co.uk
Joy Iliff (Director)		joy@thenest-ed.co.uk

External contacts

Department for Education <i>Educational concerns</i>	0370 000 2288	www.education.gov.uk
NSPCC <i>Child protection</i>	0808 800 5000	help@nspcc.org.uk
Information Commissioners Office <i>Data protection and FOI</i>	0303 123 1113	
Equality advisory support service <i>Discrimination</i>	0808 800 0082	http://www.equalityadvisoryservice.com/
Health and Safety Executive <i>Health and safety concerns</i>	0300 003164	www.hse.gov.uk
Environment Agency <i>Pollution, environmental impact</i>	0370 8506506	www.environment-agency.gov.uk
Thames Valley Police <i>Criminal</i>	101	www.thamesvalley.police.uk/contact/af/contact-us-beta/contact-us/

Appendix C – Essential Complaint Information