



Whistleblowing Policy

B15

**Dolphin School Trust
inc. Noah's Ark Nurseries**

Reviewed by:	Lucy Price (Headteacher)
Last reviewed:	September 2026
Next review:	September 2027

1. Introduction

Dolphin School and Noah's Ark Nurseries expect the highest standards of conduct from all employees and will treat seriously any concern that any staff or other workers may have about illegal, improper, or unsafe practice.

This policy provides a clear procedure for raising concerns about wrongdoing, unsafe practice or failures in safeguarding arrangements without fear of retaliation. The Trust recognises that workers may have statutory protection when making a qualifying disclosure which they reasonably believe is in the public interest. Staff do not need to prove that wrongdoing has occurred before raising a concern.

This procedure covers concerns about:

- illegal or improper conduct;
- breaches of school policies or procedures;
- safeguarding practice failures that may put children at risk;
- health and safety risks;
- financial malpractice;
- conduct that damages the reputation of the Trust;
- deliberate concealment of wrongdoing;
- serious failures to implement safeguarding or health and safety procedures.

This policy is separate from the Trust's Disciplinary, Grievance and Capability Procedures, which ordinarily address individual employment concerns, conduct and capability matters. However, an employment-related concern may also constitute a protected disclosure where the relevant statutory conditions are met.

2. Purpose of the Policy

- To encourage all staff to feel confident in raising serious concerns.
- To provide clear procedures for reporting concerns, including safeguarding matters.
- To ensure that concerns are dealt with properly, fairly, and promptly.
- To protect whistleblowers from victimisation, discrimination, or disadvantage.

3. When to Use This Policy

Where an employee has a reasonable suspicion of wrongdoing or safeguarding concern, even if it may not meet formal thresholds.

Where concerns may relate to:

- criminal offences;
- breaches of legal obligations;
- financial irregularities, fraud, or corruption;

- unsafe working practices;
 - danger to health and safety;
 - abuse or neglect of children;
- failure to comply with statutory safeguarding requirements (KCSIE 2026).

Staff do not need to be certain; reporting reasonable suspicions in good faith is sufficient.

Concerns Relating to an Employee's Own Conduct

This policy is intended to enable staff to raise concerns about wrongdoing, unsafe practice or failures within the Trust. It is not intended to provide an alternative to the Trust's Disciplinary, Grievance and Capability Procedures or to remove an individual's accountability for their own conduct.

Where a concern relates primarily to a member of staff's own conduct, performance or actions, it will ordinarily be addressed through the appropriate management, safeguarding or disciplinary procedure.

However, a member of staff may make a protected disclosure about wrongdoing in which they have themselves been involved, where the relevant statutory conditions are met. The Trust will consider any such disclosure appropriately, but making a disclosure does not automatically prevent legitimate investigation or action concerning the individual's own conduct.

4. Safeguarding and Child Protection

All staff have a responsibility to report concerns about the safety and welfare of children promptly in accordance with the Trust's Safeguarding and Child Protection Policy.

Concerns about a child's safety or welfare should ordinarily be reported to the DSL or a Deputy DSL.

Concerns may include (but are not limited to):

- physical, sexual, or emotional abuse of a pupil;
- neglect of a pupil;
- an improper or inappropriate relationship between an adult and a pupil;
- concerns about the culture or practices of the school that may place children at risk;
- low-level concerns about staff behaviour.

Concerns about the conduct of an adult working in or on behalf of the Trust must be reported through the procedures for allegations against adults or low-level concerns, as appropriate. Concerns about the Headteacher must be reported to the Chair of Governors.

Where a concern relates to wider safeguarding failures, unsafe practice, a failure to act on concerns or a culture which may place children at risk, staff may raise the matter under this Whistleblowing Policy.

Staff must not delay reporting an immediate safeguarding concern while deciding which policy applies. Where a child is at immediate risk of harm, appropriate emergency action must be taken.

Concerns should be reported to the Designated Safeguarding Lead (DSL) or a Deputy DSL.

- Where the concern involves the DSL or Headteacher, staff should report directly to the Chair of Governors. (petronella.vandervliet@dolphinschool.london)

Where staff believe that internal reporting is inappropriate, concerns are not being addressed, or children remain at risk, they may contact the relevant external safeguarding body

- NSPCC Whistleblowing Advice Line: 0800 028 0285 / help@nspcc.org.uk
- Wandsworth Local Authority Designated Officer (LADO): 0208 871 5188 / lado@wandsworth.gov.uk
- Independent Schools Inspectorate (ISI): 0207 600 0100 / info@isi.net

5. How to Raise a Concern

In the first instance, concerns should normally be raised with the Headteacher or, for Noah's Ark West Side, the Nursery Site Head (Rachael.strachan@dolphinschool.london).

If the concern relates to the Headteacher/Nursery Head, or if a concern has been raised but no appropriate action taken, the concern should be reported to the Chair of Governors (petronella.vandervliet@dolphinschool.london) .

Concerns may be raised verbally or in writing. Staff should provide as much factual information as reasonably available, but a lack of documentary evidence should not prevent a concern from being raised.

Staff may be accompanied by a colleague, union representative, or trusted person (independent of the issue) at any meeting.

Anonymous concerns will be considered, although anonymity may limit the Trust's ability to investigate or provide feedback. The Trust will seek to protect the identity of a person raising a concern wherever reasonably possible, subject to legal obligations and the requirements of a fair investigation.

Staff are not required to raise a concern with a person who is implicated in the matter or where they reasonably believe that doing so would compromise the appropriate handling of the concern.

6. Investigation and Outcome

Concerns will be assessed promptly and handled by an appropriate person who is sufficiently independent of the matter raised. Where necessary, the Trust may appoint an external investigator or seek specialist advice.

The Trust will maintain an appropriate confidential record of the concern, actions taken, relevant decisions and outcome.

The person raising the concern will normally be informed that their concern has been received and, where appropriate, provided with an indication of the next steps. Feedback on the outcome will be provided as far as reasonably possible, subject to confidentiality, safeguarding, data protection and employment considerations.

Where a concern involves safeguarding, the Trust will follow its Safeguarding and Child Protection Policy and make referrals to relevant external agencies where required.

The scope and method of investigation will depend on the nature of the concern, but will usually involve:

- a preliminary fact-finding review;
- interviews with relevant staff;
- liaison with safeguarding partners where appropriate.

7. Protection for Whistleblowers

The Trust is committed to ensuring that staff can raise genuine concerns without fear of retaliation.

Workers who make protected disclosures are entitled to protection from unlawful detriment, and employees are protected from dismissal because they have made a protected disclosure.

The Trust will not tolerate harassment, victimisation, intimidation or other retaliation against a person because they have raised a concern appropriately.

Staff who believe they have suffered retaliation should report this promptly to the Headteacher or Chair of Governors, as appropriate.

A concern raised in reasonable belief which subsequently proves to be mistaken will not, of itself, result in disciplinary action.

Where there is evidence that a person has knowingly made a deliberately false allegation, this may be considered under the Trust's Disciplinary Policy. The fact that a concern is unsubstantiated does not mean that it was deliberately false.

8. External Reporting and Advice

The Trust encourages staff to raise concerns internally where appropriate but recognises that there may be circumstances in which an external disclosure is necessary or appropriate.

Staff may seek advice from the NSPCC Whistleblowing Advice Line, Protect (the whistleblowing charity), ACAS or an appropriate professional or trade union representative.

Safeguarding concerns may be referred to the relevant Local Authority Designated Officer, children's social care, police or other appropriate safeguarding body.

Regulatory concerns may be raised with the Independent Schools Inspectorate or another relevant regulator, as appropriate.

Whether an external disclosure qualifies for statutory whistleblowing protection will depend on the circumstances and the applicable legal requirements.

9. Whistleblowing in the Early Years Foundation Stage

These arrangements apply equally to staff working within Noah's Ark Nurseries and the EYFS provision at Dolphin School.

All EYFS staff must understand how to raise concerns about inappropriate conduct, unsafe practice, safeguarding failures or other matters which may place children at risk.

Staff must be able to raise concerns through appropriate internal or external channels without fear of retaliation.

The Trust will ensure that whistleblowing arrangements are communicated during induction and reflected in its Safeguarding and Child Protection Policy, in accordance with the EYFS statutory framework.

10. Links to Other Policies

This policy should be read in conjunction with:

- Safeguarding & Child Protection Policy
- Staff Code of Conduct
- Low-Level Concerns Procedure
- Managing Behaviour Policy
- Anti-Bullying Policy
- Complaints Policy
- Disciplinary, Grievance and Capability Procedures
- Equity, Equality, Diversity & Inclusion Policy
- Health, Safety & Welfare Policy
- Managing Sickness Absence Policy and Procedure
- Allergy Safety Policy

- First Aid Policy
- Administration of Medicines Policy
- SEND Policy
- Educational Visits Policy
- Data Protection Policy

11. Review

This policy is reviewed annually (or sooner if statutory guidance changes) to ensure compliance with:

- Keeping Children Safe in Education (2026)
- The Education (Independent School Standards) Regulations (2014)
- Local safeguarding partnership requirements