



## Whistleblowing Policy

### Whistleblowing

Whistleblowing is the term used when someone who works in or for an organisation wishes to raise concerns about malpractice or wrongdoing. It is regulated by The Public Interest Disclosure Act of 1998, also known as the Whistleblowing Act.

To further understand Whistleblowing, please read the below extract from *'Whistleblowing, Guidance for Employers and Code of Practice, March 2015'*

<https://www.gov.uk/government/publications/whistleblowing-guidance-and-code-of-practice-for-employers>

That whistleblowing legislation continues to evolve. The Employment Rights Act 2025 have further addressed protected disclosures related to issues like sexual harassment

<https://www.gov.uk/guidance/whistleblowing-guidance-for-employers>

“To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means, that personal grievances and complaints are not usually covered by whistleblowing law. The second thing that a worker must reasonably believe is that the disclosure tends to show past, present, or likely future wrongdoing falling into one or more of the following categories:

Criminal offences (this may include, for example, types of financial impropriety such as fraud)

- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering a person’s health and safety
- damage to the environment
- covering up wrongdoing in the above categories.”

Whistleblowing is very different from a complaint or a grievance, which are not usually covered by whistleblowing law. If you wish to raise concerns over how child protection issues are being handled, the NSPCC Whistleblowing Advice Line can be reached on 0800 028 0285. If you have a complaint of a grievance, please see Complaint Procedure.

### Reporting

SE recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to those for whom SE is providing a service (international students). SE will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

### Confidentiality

All allegations will be treated in confidence. SE will not, without the whistleblower’s consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation. Sometimes the

whistleblower might be asked to give a statement as part of the investigation, in which case their identity may have to be revealed.

### Anonymous allegations

This policy encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to prove. In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

### Untrue allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

### Procedure for making an allegation

Depending on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice, if the whistleblower believes that SE management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

The NSPCC whistleblowing helpline. Telephone number 0800 028 0285 between 8am and 8pm Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

'Protect' provide a free, confidential advice line for concerned staff to call before whistleblowing. The helpline is 020 3117 2520 and their website is: [www.pcaw.co.uk](http://www.pcaw.co.uk).

AEGIS Telephone number 01453 821 293 or email [yasemin@aegisuk.net](mailto:yasemin@aegisuk.net)

All SE staff, guardian homestays, school staff, parents, students and agents have the right to refer their allegations to the local LADO

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation

Any allegations reported to SE should be responded to in writing by SE Principal within 5 working days

Policy date: **7<sup>th</sup> June 2025**

Responsibility for Policy Review: **Andrew Sutherland**