

PACE EDUCATION PATHWAYS

Whistleblowing Policy

Document control	Detail
Policy title	Whistleblowing Policy
Document status	Approved for use
Version	2.1
Policy owner	Nathan Warr
Approved by	Hannah Lewis
Applies to	Staff, tutors, associate tutors, volunteers and directors
Date approved	21/08/2026
Next review date	12 months from approval, or earlier where a review trigger applies
Review trigger	Earlier review if guidance, law, service model, commissioning requirements or serious incidents require change
Linked Policies	Safeguarding and Child Protection Policy; Managing Allegations Against Staff Policy; Staff Code of Conduct and Low-Level Concerns Policy; Compliments and Complaints Policy; Safer Recruitment, DBS and Staff Suitability Policy; Data Protection and UK GDPR Policy; Staff Supervision and Case Review Policy; Prevent, Extremism and Radicalisation Policy; Incident Reporting Policy.

Governance note

Whistleblowing sits alongside safeguarding, complaints, staff conduct and safer recruitment procedures. Where a disclosure relates to immediate risk to a child, unsafe practice or an allegation against an adult, safeguarding procedures must be followed without delay.

1. Purpose

This document supports safe, consistent and accountable delivery of 1:1 alternative provision, tutoring, re-engagement and reintegration support. It is designed for a small provider working with children and young people who may have safeguarding, SEND, SEMH, EBSA, attendance or behaviour-related needs.

2. Scope

This document applies to all PACE staff, directors, tutors, associate tutors, volunteers and contractors involved in the referral, planning, delivery, review or governance of provision.

3. What can be raised

- Safeguarding failures or unsafe practice.
- Concerns about adults working with children.
- Failure to follow policy, law or commissioning requirements.
- Fraud, dishonesty, data misuse or serious governance failure.
- Covering up incidents, complaints or safeguarding concerns.

4. How to raise a concern

1. Raise with the Director, DSL or document owner where appropriate.
2. If the concern relates to those people, raise it with an alternative senior lead or relevant external authority.
3. If a child is at immediate risk, contact emergency services or children's social care without delay.
4. Record the concern clearly, including dates, people involved and supporting information.

5. Protection from victimisation

PACE will not tolerate victimisation, retaliation or disadvantage against anyone who raises a genuine concern in good faith. Malicious or knowingly false allegations may be managed under conduct arrangements.

6. Records and learning

Whistleblowing concerns will be handled confidentially as far as possible, recorded securely, reviewed by senior leadership and used to improve safeguarding, governance and operational controls.

7. External escalation

A worker may raise a concern outside PACE where internal reporting is inappropriate, has not addressed the concern, or the matter requires statutory action. Depending on the issue this may include the commissioning organisation, local authority safeguarding services/LADO, police, Health and Safety Executive, Information Commissioner's Office, Disclosure and Barring Service or another prescribed/regulatory body. Immediate safeguarding or emergency action must not be delayed while an internal whistleblowing route is considered.

8. Confidentiality and records

PACE will protect the identity of a person raising a concern as far as reasonably possible, while recognising that investigation or legal duties may require limited disclosure. Records will distinguish the concern, evidence considered, action taken, safeguarding or regulatory referrals, outcome and learning.

9. Monitoring and review

The Governance Lead will review whistleblowing themes and actions without exposing unnecessary personal information. The policy will be reviewed annually and after any significant disclosure, retaliation concern, external referral or governance finding.