

1. PURPOSE

- 1.1 At Indie Education (**Indie**), we are committed to the highest standards of integrity, transparency, and accountability. We uphold all statutory obligations under the SEND Code of Practice, the Children and Families Act 2014, and the Nolan Principles (see Appendix A). We recognise that all organisations may, from time to time, face the risk of illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations or to address them when they occur.
- 1.2 This Policy aims to:
- (a) Encourage employees to report suspected wrongdoing as soon as possible, knowing that their concerns will be taken seriously, investigated appropriately, and treated confidentially.
 - (b) Provide clear guidance on how to raise concerns.
 - (c) Reassure employees that they can raise genuine concerns without fear of reprisal, even if they turn out to be mistaken.
- 1.3 All Indie colleagues have a statutory duty to act in the best interests of learners and young people with SEND. Failure to raise a concern may result in disciplinary action.
- 1.4 This Whistleblowing Policy does not replace other policies and procedures, including:
- (a) Child Protection and Safeguarding Policy
 - (b) Complaints Policy and Procedure
 - (c) Employee Code of Conduct

2. SCOPE

- 2.1 This Policy applies to all Indie Education (**Indie**) employees (including full time, part time, permanent, fixed term and casual), contractors, volunteers, members of the governing Board of Trustees, and any other associated persons or entities.

3. DEFINITIONS

- 3.1 In this Policy, the following definitions apply unless the context otherwise requires:
- 3.1.1 **Colleague or Colleagues** – used widely to include anyone working in or on behalf of Indie Education as an employee, contractor, volunteer, member of the Board of Trustees, and any other associated person or entity.

4. WHAT IS WHISTLEBLOWING?

- 4.1 Whistleblowing is the disclosure of information relating to suspected wrongdoing or dangers at work. This may include (but is not limited to):
- (a) Criminal activity
 - (b) Miscarriage of justice

- (c) Risks to health and safety
- (d) Damage to the environment
- (e) Fraud, corruption, or bribery (see Fraud Policy)
- (f) Decision-making for personal gain or abuse of position
- (g) Safeguarding/child protection concerns not being dealt with properly
- (h) Contradictions to policies or codes of practice
- (i) Actions likely to cause harm to the public, Indie Education, employees, or learners (including bullying/victimisation)
- (j) Breaches of legal obligations
- (k) Deliberate concealment of any of the above

4.2 A whistleblower is anyone who raises a genuine concern in good faith. Employees have a professional duty to report any concerns that put the safety of others or the organisation at risk. Failure to do so may result in disciplinary action. Note: Personal grievances should be dealt with under the grievance procedure, not whistleblowing.

5. CONFIDENTIALITY AND ANONYMITY

5.1 Concerns should be raised in confidence, not anonymously, wherever possible. This aligns with Independent School Inspectorate (ISI) expectations for robust safeguarding practice. Anonymous concerns will be considered if the issue is serious, credible, and can be verified. Indie Education will always seek to maintain confidentiality, except where disclosure is required to protect a child or comply with statutory duties. Whistleblowers are protected under the Public Interest Disclosure Act 1998. Malicious or knowingly false allegations are not protected and may result in disciplinary action. No harassment or victimisation will be tolerated.

6. RAISING A WHISTLEBLOWING CONCERN

6.1 Safeguarding Concerns

- (a) Immediately report to the Designated Safeguarding Lead, Sara Elverson Marsh (DSL) or Deputy DSL (Shaun Denigan DDSL).
- (b) If the concern is about the DSL, report to the CEO (Chris Bruce).
- (c) If you believe a child is at immediate risk, contact the Police or local authority without delay.

6.2 Other Concerns

- (a) For College-Based Employees or Volunteers: Raise your concern with your line manager or a senior leader. If the issue involves your manager, escalate to the CEO or DCEO. If the concern relates to the Executive Team, contact the Chair of the Board of Trustees (Harry Fowler).
- (b) For Trustee Volunteers: Raise concerns about a Trustee with the Chair of the Board of Trustees (see Appendix C).

6.3 External Routes (if needed)

- (a) ISI: ISI Whistleblowing Guidance
- (b) Ofsted: Whistleblowing to Ofsted
- (c) Local Authority Designated Officer (LADO)
- (d) Police or other statutory agencies

7. HOW YOUR CONCERN WILL BE MANAGED

7.1 All concerns will be treated seriously and handled in line with ISI and safeguarding requirements. The action taken may include:

- (a) Internal or external investigation
- (b) Referral to statutory agencies (e.g., local authority, Ofsted, ISI, Police)
- (c) Safeguarding referrals (as per KCSIE)

7.2 The person receiving your concern will, within 10 working days:

- (a) Acknowledge receipt
- (b) Explain next steps and likely timescales
- (c) Indicate if further investigation will take place (and why/why not)

7.3 Whistleblowers can be accompanied by a trade union rep or colleague at meetings. Outcomes and learning from whistleblowing investigations will inform safeguarding and SEND practice, and may be reported (anonymously) to ISI during inspection.

8. OUTCOME OF INVESTIGATION

8.1 You will be informed of the outcome (subject to legal constraints) but not of confidential details or disciplinary actions regarding others. If dissatisfied, you may refer your concern to external agencies (ISI, Ofsted, local authority, Police, NAO, or Protect). Disclosure of confidential information about Indie Education, colleagues, or learners unrelated to the concern is prohibited.

9. TRAINING AND ENSURING POLICY PRACTICE

9.1 To ensure that this policy is effectively implemented and practiced:

- (a) **Training:** All colleagues and volunteers will receive training on the Whistleblowing Policy during their induction and through regular refresher sessions. This training will cover how to report concerns, the protections available to whistleblowers, and the importance of acting in the best interests of learners and young people with SEND.
- (b) **Communication:** The policy will be communicated to all colleagues, volunteers, and stakeholders through handbooks, the intranet, and during team meetings.
- (c) **Practice:** Regular audits and reviews will be conducted to ensure that the policy is being followed and that concerns are being handled appropriately. Feedback from colleagues and volunteers will be sought to continuously improve the policy and its implementation.

10. MONITORING

- 10.1 The CEO will report annually to Trustees, summarising whistleblowing cases (anonymously) and identifying lessons learned, especially relating to safeguarding and SEND. The Board will review policy effectiveness, compliance with ISI and safeguarding standards, and update policy as required.

11. POLICY REVIEW

- 11.1 This policy will be reviewed at least every three years, or sooner in line with changes to ISI regulations, SEND legislation, or best practice guidance.

12. AUTHORISATION

- 12.1 This document has been authorised by the Chief Executive Officer.

APPENDIX A: SEVEN PRINCIPLES OF PUBLIC LIFE - NOLAN PRINCIPLES

1. SELFLESSNESS

Act solely in the public interest.

2. INTEGRITY

Avoid obligations to individuals or organisations that might influence you.

3. OBJECTIVITY

Make decisions on merit.

4. ACCOUNTABILITY

Be accountable to the public and accept scrutiny.

5. OPENNESS

Be as open as possible about decisions and actions.

6. HONESTY

Declare private interests and resolve conflicts to protect the public interest.

7. LEADERSHIP

Promote and support these principles by leadership and example.

APPENDIX B: WHISTLEBLOWER REPORTING FORM

Name of person(s) you suspect:
Place of Work / Job title (if known):
Details of your suspicions (include as much detail as possible – e.g., conversations, dates, times, places, and names of other parties. Attach evidence if appropriate).
Does this relate to a safeguarding/EHCP/SEND/Finance issue? Yes / No (circle)
Your Name:
Your telephone number or contact address:

- Please return this form to your line manager, or to one of the contacts in Appendix C. For safeguarding concerns, report directly to the DSL or DDSL.

APPENDIX C: WHISTLEBLOWING CONTACTS

- **Name:** Chris Bruce
- **Role:** CEO
- **Contact:** chrisbruce@indieeducation.org

- **Name:** Sara Elverson Marsh
- **Role:** DCEO
- **Contact:** saraelversonmarsh@indieeducation.org

- **Name:** Harry Fowler
- **Role:** Chair of the Board of Trustees
- **Contact:** h.fowler@indie.edu.au

- **Independent School Inspectorate (ISI):** Regulator, concerns@isi.net, 020 7600 0100
- **Ofsted (whistleblowing):** Regulator, whistleblowing@ofsted.gov.uk, 0300 123 3155
- **DfE (Whistle blowing):** [Customer Service Team, Education and Skills Funding Agency](#)