



## Severn Mentoring Whistleblowing Policy

*(Community Mentoring & Alternative Provision – September 2025)*

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### 1. Purpose of this Policy

Severn Mentoring is committed to the highest standards of openness, integrity and accountability.

This policy provides a safe and clear process for employees, volunteers or partners to raise genuine concerns about wrongdoing, malpractice or unsafe practice within the organisation — without fear of victimisation or detriment.

Whistleblowing is a vital safeguard in maintaining trust, transparency and the safety of the young people and communities we serve.

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### 2. What is Whistleblowing?

**Whistleblowing** means reporting concerns that are in the **public interest**, such as:

- A criminal offence has been, is being, or is likely to be committed.
- Someone's health or safety is at risk.
- Safeguarding concerns are not being addressed appropriately.
- A person is being discriminated against or harassed unlawfully.
- There is financial malpractice, fraud or mismanagement of funds.
- Breaches of the law, statutory guidance or internal policy.
- The environment is being damaged.
- There is a deliberate attempt to conceal any of the above.

This policy is **not** for personal employment grievances (e.g. bullying by a colleague, pay disputes) which should be raised through Severn Mentoring's **Grievance Procedure**.

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### 3. Statement on Whistleblowing

Severn Mentoring:

- Encourages staff to raise genuine concerns **at the earliest opportunity**.
- **Will treat all disclosures seriously** and investigate them promptly, fairly and confidentially.
- Will protect whistleblowers from dismissal, victimisation or any form of retaliation.
- Will not tolerate any attempt to intimidate or silence a whistleblower.

- Will take appropriate action where wrongdoing or malpractice is substantiated.

All concerns raised under this policy will be managed in line with **KCSIE (2025)**, **Working Together (2023)**, and the **Public Interest Disclosure Act 1998**.

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#### **4. Who Can Raise a Concern**

Anyone working for or with Severn Mentoring may use this policy, including:

- Employees (permanent, fixed-term or temporary)
- Agency workers, contractors or consultants
- Volunteers, students or placement workers
- Partner organisations or suppliers

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#### **5. Procedures for Handling Whistleblowing**

##### **Step 1 – Raising a Concern Internally**

Concerns should be raised as soon as possible with the **Designated Whistleblowing Officer (DWO)**:

**Name:** Richard Kear

**Position:** Director / Designated Whistleblowing Officer

**Email:** Rich@prostars-fse.com

**Telephone:** 07717840231

If the concern relates to the DWO / senior management, the whistleblower may instead contact:

- The **Designated Safeguarding Lead (DSL)**; or
- The **Local Authority Designated Officer (LADO)** (for safeguarding-related allegations).

When raising a concern, whistleblowers should provide as much detail as possible, including:

- The nature of the wrongdoing
- Names of people involved (if known)
- Relevant dates or locations
- Any evidence or witnesses

Anonymous disclosures will be considered where sufficient detail is provided, though investigation may be limited in such cases.

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##### **Step 2 – Acknowledgement and Initial Assessment**

- The DWO will acknowledge receipt of the concern within **five working days**.
- An initial assessment will be undertaken to determine whether the matter falls under this policy and what action is required.
- If the concern is safeguarding-related, it will be escalated immediately to the DSL and handled under the **Safeguarding & Child Protection Policy**.

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##### **Step 3 – Investigation**

- Investigations will be proportionate to the nature of the allegation.

- The DWO may appoint an independent investigator or external agency where appropriate.
- All information will be handled in confidence, and data protection standards will be maintained in line with the **UK GDPR and Data Protection Act 2018**.
- The whistleblower will be informed of the progress and outcome where possible (subject to confidentiality and legal restrictions).

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#### **Step 4 – Outcomes**

Possible outcomes include:

- No evidence found; case closed.
- Informal resolution or managerial action.
- Formal disciplinary proceedings.
- Referral to external agencies (e.g. LADO, Police, Local Authority, Disclosure & Barring Service, or the ICO).
- System or policy improvements to prevent recurrence.

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#### **Step 5 – Escalation and External Reporting**

If the whistleblower feels their concern has not been properly addressed, or they reasonably believe that internal reporting may lead to cover-up or reprisal, they can raise the matter with a **prescribed external body**, such as:

- **Ofsted**: for concerns about safeguarding or children's welfare
- **Local Authority Designated Officer (LADO)**: for allegations against staff working with children
- **Information Commissioner's Office (ICO)**: for data protection breaches
- **Health and Safety Executive (HSE)**: for serious workplace safety issues
- **Public Concern at Work (Protect)**: free, independent whistleblowing advice (helpline: 020 3117 2520, protect-advice.org.uk)

Whistleblowers are legally protected when raising concerns to these prescribed bodies, provided disclosures are made in good faith and meet the public interest test.

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#### **6. Confidentiality**

All disclosures will be handled in strict confidence.

Information will only be shared with those directly involved in assessing or investigating the concern.

Where possible, anonymity will be preserved unless required by law (e.g. criminal proceedings).

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#### **7. Protection and Support for Whistleblowers**

- Severn Mentoring will **not tolerate victimisation or retaliation** against anyone who raises a genuine concern.
- Any attempt to victimise or deter a whistleblower will result in disciplinary action.
- Support and advice will be available through management supervision, the DSL, or external support agencies such as *Protect*.

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## **8. Malicious or Vexatious Allegations**

While all concerns are taken seriously, malicious or knowingly false allegations are themselves misconduct and may lead to disciplinary action.

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## **9. Monitoring and Review**

- The Directors and DSL will monitor whistleblowing activity and report any patterns or learning outcomes.
- This policy is reviewed **annually** or earlier if legislative or regulatory guidance changes.
- Lessons learned from investigations will be used to strengthen governance and safeguarding practice.

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**Approved by:** Directors / DSL

**Date:** September 2025

**Next Review:** September 2026

**Applies to:** All Severn Mentoring staff, volunteers, contractors, and partner organisations