



## WHISTLEBLOWING POLICY

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### 1. INTRODUCTION & PURPOSE

Ohana Centre is committed to maintaining a culture of openness, transparency and professional curiosity where all staff feel confident to raise concerns about unsafe practice, wrongdoing or behaviour that may place children, families or colleagues at risk.

This policy supports the safeguarding culture described in our **Safeguarding & Child Protection Policy** and is part of our statutory duty to prioritise the welfare and safety of children. All concerns raised in good faith are welcomed and will be taken seriously.

Whistleblowing helps protect:

- Children
- Staff
- Families
- The integrity of Ohana Centre
- Public confidence in our work

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### 2. DEFINITION

Whistleblowing means the reporting by employees and consultants of suspected misconduct, poor practice, breaches of nursery policies and procedures, aims and objectives, risk assessments, illegal acts, or failure to act within company guidelines.

This includes behaviour that conflicts with:

- Safeguarding policies
- Health and safety laws
- EYFS statutory requirements
- Professional standards
- Ethical expectations of those working with children

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### 3. SCOPE

This policy enables all staff to raise concerns without fear of victimisation, disadvantage or dismissal. Concerns may relate to:

- A criminal offence
- Failure to comply with legal obligations
- A miscarriage of justice
- Danger to the health or safety of any individual
- Safeguarding concerns involving children
- Attempted concealment of wrongdoing
- Behaviour or actions inconsistent with safe practice

Whistleblowing is NOT:

- A personal grievance
- A complaint about your own employment terms
- A disagreement between staff

These should follow other internal procedures.

Whistleblowing is used when:

- A child may be at risk
- A colleague behaves inappropriately
- Poor practice is being ignored
- Concerns are not being addressed through normal reporting channels
- Management is involved in the concern

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### 4. CULTURE OF SAFETY, PROFESSIONAL CURIOSITY & LOW-LEVEL CONCERNS

In line with our Safeguarding Policy, Ohana Centre promotes:

- A culture where **all concerns are taken seriously**

- Openness, transparency and accountability
- Early reporting to prevent harm
- A no-blame environment for raising concerns
- Staff confidence to challenge unsafe or unclear practice

Whistleblowing includes raising:

- Serious safeguarding concerns
- Repeated low-level concerns forming a pattern
- Breaches of safe working practice
- Boundary violations
- Violations of digital safety or intimate care procedures

Low-level concerns should be recorded and monitored by DSLs, but staff may use whistleblowing if they feel concerns are not acted on appropriately.

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## 5. SEND-SPECIFIC WHISTLEBLOWING CONCERNS

Because we support children with SEND and complex needs, whistleblowing must include concerns such as:

- Ignoring non-verbal distress or behavioural indicators
- Dismissing regression or sudden changes as “just autism”
- Unsafe restraint or rough handling
- Inappropriate intimate care
- Failure to follow a child’s IEP, therapy plan or sensory regulation plan
- Neglecting supervision of highly vulnerable children
- Unsafe or inappropriate digital device use (AAC, tablets, recording)
- Staff disregarding environmental safety or elopement risks
- Not escalating concerns about injuries, marks or repeated dysregulation

Any of these issues must be escalated immediately.

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## 6. RELATIONSHIP WITH SAFEGUARDING POLICY

This policy must be read alongside our **Safeguarding & Child Protection Policy**.

If a concern involves:

- Risk of harm to a child
- Staff conduct around children
- Boundary breaches
- Digital safety misuse
- Intimate care concerns
- Unsafe or neglectful practice

Then **safeguarding procedures take priority**, and the DSL must be informed immediately.

DSL Team:

- **DSL:** Alba Arenas Martín
- **Deputy DSL:** Amerie Appiah-Badu

If the concern involves the DSL or senior leaders, staff must contact LADO or Ofsted directly.

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## 7. PROCESS

### 7.1 Internal Reporting

An employee should initially raise concerns with the **Manager or DSL**.

If the nursery manager is involved, concerns must be reported to the **Director**.

The DSL will determine whether the concern also triggers safeguarding procedures.

### 7.2 Safeguarding Escalation

If a child is at immediate risk:

- Staff must intervene to protect the child
- Contact the DSL
- DSL must contact **LADO** without delay

This aligns with statutory EYFS safeguarding requirements.

### 7.3 Escalation When Internal Routes Are Not Safe or Effective

A concern may be directly reported to:

- **Local Authority Designated Officer (LADO)**
- **MASH / Children's Services**
- **Ofsted**
- **Police (if crime suspected or child in immediate danger)**

Staff should bypass management if:

- Management is involved in the concern
- There is fear of victimisation
- Concerns raised previously were not addressed
- Delay may place a child or staff member at risk

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## **8. EXTERNAL CONTACT DETAILS**

### **Ofsted Whistleblowing Team**

0300 123 3155

[whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

### **RBKC LADO**

020 7361 2120

[KCLADO.Enquiries@rbkc.gov.uk](mailto:KCLADO.Enquiries@rbkc.gov.uk)

### **MASH (RBKC)**

020 7361 3013

### **Police**

999 (emergency)

101 (non-emergency)

Staff may go directly to these bodies at any time.

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## **9. CONFIDENTIALITY**

All concerns will be treated in confidence. We will make every effort not to reveal the whistleblower's identity unless legally required.

If disciplinary proceedings require evidence, staff may be asked to act as witnesses and will be supported throughout.

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## **10. PROTECTION FROM VICTIMISATION**

Ohana Centre will not tolerate harassment, intimidation or discrimination against any whistleblower acting in good faith.

Any retaliation will be treated as a **serious disciplinary matter**.

The Public Interest Disclosure Act protects employees from detriment or dismissal where disclosures meet legal requirements.

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## **11. MALICIOUS OR BAD-FAITH ALLEGATIONS**

Deliberately false or malicious allegations may result in disciplinary action.

However, staff should never fear raising concerns in good faith, even if they later prove unfounded.

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## **12. LEADERSHIP RESPONSIBILITIES**

Directors and senior management must ensure:

- Concerns are handled objectively and promptly
  - Investigations are free from conflict of interest
  - Whistleblowers are protected
  - Outcomes and actions are recorded clearly
  - Learning informs policy and practice improvements
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## **13. RECORD KEEPING**

Whistleblowing concerns must be logged securely, including:

- Concern raised
- Date and time
- Action taken
- Outcome

- Any safeguarding referrals
  - Support given to whistleblower
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#### **14. POLICY REVIEW**

- Original adoption: **4<sup>th</sup> November 2022**
  - Last review: **8th December 2025**
  - Reviewed By: Alba Arenas Martín
  - Next review due: **November 2026** or earlier if statutory guidance changes.
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