



WESTERFIELD COLLEGE

LEARNING AND ENRICHMENT CENTRE

Discover. Lead. Excel.

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Status	Draft
Reviewing Member of Staff	Centre Manager
Review Date	June 15, 2026
Review Cycle	Annually

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IMPACT THE CHILD... IMPACT THE WORLD.

1. Introduction & Core Ethos

Westerfield College Learning and Enrichment Centre operates high-intensity, short-course educational programmes that place the safety, well-being, and academic development of our students above all else. Because our enrichment blocks run on a highly condensed timeline and operate predominantly as residential campuses, we require an environment of absolute transparency, openness, and institutional honesty.

Malpractice, safety failures, and ethical breaches must never be tolerated or concealed. This policy provides a secure, legally protected mechanism for staff members, contractors, volunteers, and external agents to raise serious concerns regarding systemic wrongdoing without fear of victimization, professional detriment, or career retaliation. In alignment with top-tier British independent school frameworks, the centre views whistleblowing not as an act of disloyalty, but as a vital duty that safeguards our student cohort, preserves organizational integrity, and ensures statutory compliance.

2. Governance, Compliance & Professional Assurance

To ensure absolute compliance with UK employment legislation, educational safe-working practices, and independent inspection standards, Westerfield College Learning and Enrichment Centre coordinates its whistleblowing frameworks with:

The Public Interest Disclosure Act 1998 (PIDA), providing statutory protection to workers who make qualifying disclosures.

The Department for Education (DfE) statutory guidance, ensuring seamless escalation pathways aligned with "Keeping Children Safe in Education" (KCSIE).

The Local Authority Designated Officer (LADO) and external safeguarding boards for direct reporting lines outside management structures.

Protect (formerly Public Concern at Work), the UK's leading whistleblowing charity, to access independent legal advice and best-practice standardisation metrics.

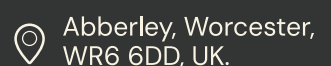
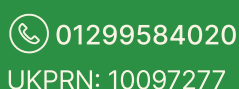
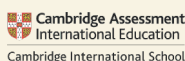
3. Definition of Terms

To ensure operational consistency across all internal and external reporting structures, the following definitions apply:

Whistleblowing: The formal disclosure of information by an employee who reasonably believes that workplace malpractice, illegal activities, or safety failures are occurring, have occurred, or are likely to occur.

Qualifying Disclosure: A report made in the public interest that is legally protected under PIDA because it reveals specific categories of wrongdoing.

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Personal Grievance: A private complaint regarding an individual's personal employment situation, shift allocations, or contract terms, which must be addressed via Policy WC22 (Staff Grievance Policy) rather than this framework.

Professional Detriment: Any form of systemic unfair treatment, harassment, exclusion, or career penalisation directed at a whistleblower following a disclosure.

Prescribed Person: An independent external body or regulator (such as Ofsted, the ISI, or the DfE) authorized by law to receive whistleblowing disclosures directly.

4. Scope & Categories of Protected Disclosures

This policy applies specifically to serious matters of public interest that bypass ordinary personal grievances.

4.1 Statutory Categories of Wrongdoing

A staff member is legally protected when raising a concern that relates to any of the following:

Criminal offenses, including financial fraud, bribery, theft, or systemic corruption.

Failures to comply with legal obligations or statutory educational standards.

Miscarriages of justice or the deliberate concealment of institutional errors.

Immediate or long-term hazards to individual health and safety on campus.

Systemic safeguarding failures, including a failure to implement "Keeping Children Safe in Education" mandates, ignoring severe boundary drift, or suppressing logged low-level concerns.

Damage to the environment or the unauthorized use of institutional resources.

4.2 Distinguishing Grievances from Whistleblowing

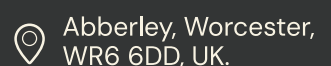
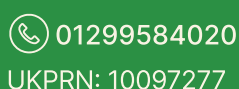
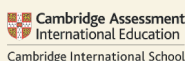
It is critical for staff to recognize the distinction between a whistleblowing disclosure and a personal grievance. If a teacher objects to a performance grade given during an appraisal, they must use the Staff Grievance Policy. However, if that same teacher discovers that a manager is systematically altering student safety tracking logs, fabricating compliance checklists, or hiding allegations made against a colleague, this represents a whistleblowing disclosure that is fully

protected under this policy.

5. The Multi-Layered Reporting & Investigation Process

The centre provides distinct internal and external pathways to ensure every public interest concern is evaluated objectively.

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5.1 Stage 1: Internal Escalation to Management

In the first instance, staff members should voice their concerns in writing to the Centre Manager. The disclosure should contain specific dates, clear narratives of the events, witness names, and references to any supporting digital or physical evidence. The Centre Manager will immediately log the disclosure in a highly restricted, secure compliance ledger.

5.2 Stage 2: Direct Escalation to Executive Leadership

If the concern directly involves the Centre Manager, or if the whistleblower has reasonable grounds to believe that management is complicit in the malpractice, the internal tracking pathway allows for an immediate bypass. The staff member may submit their qualifying disclosure directly to the CEO, Michael Dosunmu.

5.3 Stage 3: Independent External Escalation

If the whistleblower has exhausted internal pathways and reasonably believes that senior leadership has failed to act, or if they fear immediate retaliation, they have the statutory right to contact an external Prescribed Person. Approved external contacts include:

The Department for Education (DfE) or the Independent Schools Inspectorate (ISI).

The Local Authority Designated Officer (LADO) for immediate child protection concerns.

The Health and Safety Executive (HSE) for campus environmental risks.

The national whistleblowing charity, Protect, for free, confidential legal advice.

6. Proactive Disclosure, Fact-Finding and Resolution Workflow

Qualifying Disclosure Logged -> Initial Risk Assessment -> Independent Investigator Appointed -> Private Evidence Collection -> Full Executive Report -> Structural Resolution Implementation

6.1 The Investigation Framework

Upon receiving a qualifying disclosure, the CEO, Michael Dosunmu, will appoint an independent external investigator or an uncompromised senior advisor to look into the matter. The investigator will:

Conduct private, confidential interviews with the whistleblower to verify facts, ensuring their identity remains strictly protected.

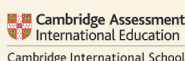
Gather digital evidence, network logs, financial accounts, or safe-recruitment files.

Produce a formal Whistleblowing Summary Report for the Academic Board, outlining whether the systemic malpractice is substantiated.

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6.2 Post-Investigation Resolution

The centre will inform the whistleblower in writing of the progress and final outcome of the investigation within five working days of its conclusion. If the investigation reveals structural failures, the centre will instantly deploy corrective measures, which may include major policy updates, staff changes, and reports to external authorities.

7. Comprehensive Protections, Confidentiality & Anti-Retaliation

The centre provides absolute legal and operational assurances to ensure whistleblowers are completely insulated from professional harm.

7.1 Absolute Statutory Protections against Detriment

Westerfield College Learning and Enrichment Centre enforces a zero-tolerance policy against any form of professional detriment, victimisation, bullying, or negative treatment directed at a whistleblower. Any manager or peer found to be penalizing, isolating, or targeting an individual for raising a genuine public interest concern will be removed from duties immediately and subjected to Level 5 Gross Misconduct disciplinary actions, leading to summary dismissal.

7.2 Management of Anonymity and Confidentiality

Confidential Disclosures: The centre strongly encourages whistleblowers to state their

names clearly, as this allows investigators to conduct thorough follow-up questions and provide real-time protections. The centre guarantees that the whistleblower's identity will be kept strictly confidential and will never be disclosed without their explicit written consent.

Anonymous Disclosures: Staff may choose to submit disclosures anonymously. While these reports will always be logged and evaluated, they are inherently more difficult to investigate effectively if critical details are missing.

8. Accelerated Whistleblowing Appeals & Protection Reviews

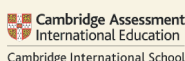
8.1 Right to Fast-Track Executive Intervention

If a whistleblower believes that their identity has been compromised, that their concern is being ignored by investigators, or that they are experiencing subtle forms of professional retaliation on campus, they have a right to an immediate executive review.

Submission Timeline: The request for executive intervention must be sent via email directly to the CEO, Michael Dosunmu, at any point during or immediately following the investigation.

Operational Protection Measures: To ensure the whistleblower's safety and peace of mind, the CEO may authorize temporary shift changes, alternative campus accommodation, or a paid leave of absence while the protection review is conducted.

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8.2 Panel Review and Final Binding Directive

The CEO, Michael Dosunmu, will assemble an emergency Whistleblowing Appeals Panel consisting of himself and at least one independent educational legal advisor or external human resources consultant detached from the centre's daily operations.

Final Judgment: The panel will thoroughly review the handling of the disclosure, the investigator's logs, and the whistleblower's workspace interactions. The CEO will issue a final, binding decision and directive within forty-eight hours, establishing whether alternative investigation teams must be appointed, or ordering immediate disciplinary sanctions against staff members who breached confidentiality protocols.

9. Quality Assurance & System Auditing

9.1 Regular Whistleblowing Ledger Audits

The Centre Manager conducts regular, confidential audits of the restricted whistleblowing ledger. These audits ensure that all case files, interview records, and safety resolutions are securely organized and managed in full compliance with UK data privacy laws and independent school governance frameworks.

9.2 Post-Course Compliance Analysis

Following the completion of each short-course enrichment cycle, the executive team reviews aggregated, completely anonymized whistleblowing data. This analysis looks for patterns of institutional drift, evaluates the speed of management responses, and updates pre-course staff inductions to ensure the centre maintains an open, safe, and transparent culture across all future intakes.

10. Policy Review & Version History

10.1 Policy Review

To preserve absolute alignment with changing UK employment laws, PIDA frameworks, and Department for Education safety developments, this policy is subject to a formal, rigorous review cycle annually by the Centre Manager. If external statutory updates or independent educational inspection outcomes necessitate an earlier modification, the review window will be moved forward accordingly.

10.2 Version History

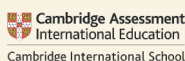
The table below tracks the complete evolution of this policy document:

No: 1 Revised on: 30th November 2024 Version: Version 1.0 Changes: Initial baseline formulation for student internet access codes and basic computer lab guidelines. Approved by: Academic Board Date of Approval: 30th November 2024 Revised by: Policy Lead

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No: 2 Revised on: 17th June 2026 Version: Version 1.1 Changes: Comprehensive upgrade implementing enterprise-grade automated filtering controls, real-time trigger keywords alerts, a detailed digital code of conduct, fast-tracked 12-hour parent/agent notifications, parental financial travel liabilities for digital exclusions, and accelerated appeal tracks under the joint authority of the CEO, Michael Dosunmu, and the Centre Manager. Approved by: Centre Manager Date of Approval: 17th June 2026 Revised by: Senior Registry Officer



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