LEARN - TRAIN - REFLECT - ACHIEVE

‘Reality Strikes Academy provides alternative education that combines academic learning with football coaching to help young people reengage with education, through a trauma informed, nurturing environment. The vision is to foster holistic personal and emotional growth to create positive pathways into the future for young people.’

REALITY STRIKES ACADEMY

WHISTLEBLOWING POLICY

2026/27

Date Reviewed: August 2026
Next Review Date: September 2027

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1. **Whistleblowing flowchart**

Important Contacts

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Reuben Bowen	Reuben.bowen@realitystrikes.co.uk 07446802436
Deputy Designated Safeguarding Lead (DDSL)	Sam Woodhall	sam.woodhall@realitystrikes.co.uk 07359713896
Chair of Governors	Richard Woods	richardwoods8@icloud.com 07969394852
Governor for Safeguarding and Quality Assurance	TBC	TBC
Director/Proprietor	Sam Woodhall	sam.woodhall@realitystrikes.co.uk 07359713896

1. Policy Statement

At Reality Strikes Academy, we are committed to the highest standards of integrity, transparency, and accountability in all aspects of our work. Our culture is built on trust, professional curiosity, and a shared responsibility to safeguard and protect the wellbeing of every child and member of our community.

We recognise that all staff, volunteers, and those connected with the school have an important role to play in identifying and reporting behaviours or practices that are unsafe, unethical, or inconsistent with our values and statutory duties.

The purpose of this policy is to provide a clear framework for raising concerns — known as *whistleblowing* — about any form of wrongdoing, misconduct, or malpractice within the Academy, including safeguarding concerns, health and safety risks, or breaches of professional or financial integrity.

Reality Strikes Academy actively encourages all staff to speak up if they have genuine concerns. We are committed to ensuring that:

- Concerns are taken seriously, investigated fairly, and acted upon promptly.
- Whistleblowers are protected from any form of detriment, victimisation, or discrimination as a result of raising a concern in good faith.
- Confidentiality is respected throughout the process wherever possible.
- Concerns can be raised through multiple routes, including internal escalation to the Designated Safeguarding Lead (DSL), *Sam Woodhall*, or external agencies where appropriate.
- Lessons learned from whistleblowing investigations are used to improve practice, strengthen safeguarding systems, and maintain an open, reflective culture.

This policy applies to all employees, agency staff, contractors, volunteers, and others working with or on behalf of Reality Strikes Academy.

We will not tolerate the concealment of wrongdoing.
Speaking up protects our pupils, supports our colleagues, and strengthens the integrity of our school. Every individual has a responsibility to ensure that Reality Strikes Academy remains a safe, ethical, and accountable place to learn and work.

2. Policy Aims and Scope

This policy sets out Reality Strikes Academy's approach to encouraging and supporting all members of our school community to raise concerns about wrongdoing, malpractice, or unsafe practice in a responsible and confidential manner.

Our Aims

This policy aims to:

- Encourage and empower staff and others connected with the school to report suspected wrongdoing or poor practice as soon as possible, in the confidence that their concerns will be taken seriously, investigated fairly, and treated with appropriate confidentiality.
- Provide clear guidance for all staff, volunteers, and contractors on how to raise a concern about any matter that may compromise the safety, wellbeing, or integrity of pupils, staff, or the organisation.
- Outline transparent procedures for how Reality Strikes Academy will respond to, investigate, and resolve such concerns.
- Ensure protection and reassurance for anyone who raises a whistleblowing concern in good faith, making clear that they will not face victimisation, retaliation, or disadvantage for doing so — even if the concern is not ultimately substantiated.

(However, deliberately false or malicious allegations may be treated as a disciplinary matter.)

- Promote and sustain a culture of professional curiosity, transparency, and accountability, where safeguarding and ethical conduct are everyone's responsibility.
- Reinforce our commitment to maintaining a safe, honest, and nurturing school environment, where all adults act in the best interests of children and young people.

Scope

This policy applies to all individuals working with or for Reality Strikes Academy, including:

- Employees (full-time, part-time, and sessional).
- Volunteers and student placements.
- Contractors and self-employed individuals providing services on-site.
- Supply or agency staff.

This policy does not form part of any employee's contract of employment and may be reviewed or amended at any time to reflect current legislation or best practice.

3. Legislation

The Reality Strikes Academy Whistleblowing Policy has been developed in line with current legislation, statutory guidance, and best practice to ensure that staff and all members of our community are protected when raising genuine concerns.

This policy should be read in conjunction with other key safeguarding and governance documents, including the Safeguarding and Child Protection Policy, Staff Code of Conduct, and Complaints Procedure.

The following legislation and guidance underpin this policy:

Primary Legislation

- Public Interest Disclosure Act 1998 (PIDA)
  – Establishes legal protection for workers who disclose information in the public interest about wrongdoing, malpractice, or risks to health and safety.
- Employment Rights Act 1996 (as amended by PIDA)
  – Protects employees from dismissal or detrimental treatment as a result of making a protected disclosure.
- Equality Act 2010
  – Protects whistleblowers from discrimination and victimisation related to protected characteristics.
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
  – Provides the legal framework for handling personal information appropriately and securely when investigating whistleblowing concerns.
- Health and Safety at Work etc. Act 1974
  – Places duties on employers to provide safe working conditions and empowers employees to report unsafe practices or breaches.

Statutory and Regulatory Guidance

- Keeping Children Safe in Education **(KCSIE 2025)**
  – Requires all schools to have clear processes for whistleblowing and for staff to be aware of how to raise safeguarding concerns about poor or unsafe practice, including where leadership may be involved.

- Working Together to Safeguard Children (2023)
  – Stresses the responsibility of all professionals to take action when there is a concern that a child is at risk of harm, and to escalate concerns if appropriate responses are not made.

- Education (Independent School Standards) Regulations 2014 (as amended)
  – Standard 7: "Welfare, Health and Safety of Pupils" requires proprietors to ensure there are appropriate arrangements for staff to raise concerns about safeguarding, welfare, or misconduct.

- Ofsted's 'Inspecting Safeguarding in Early Years, Education and Skills Settings' (2023)
  – Highlights the importance of a culture of openness and transparency, where staff are confident to report concerns without fear of retribution.

- Department for Business and Trade (DBT) – Guidance on Whistleblowing (2023)
  – Provides practical guidance for employers on supporting workers who make protected disclosures and maintaining fair procedures.

Purpose of Alignment

By aligning with these legal and regulatory frameworks, Reality Strikes Academy ensures that:

- Staff and volunteers understand their rights and protections when raising concerns.
- The Academy meets its statutory safeguarding duties under education law.
- Concerns about malpractice, safeguarding, health and safety, or unethical behaviour can be raised and addressed transparently, fairly, and without fear.

4. Definition of Whistleblowing

Whistleblowing refers to raising a concern about suspected wrongdoing, malpractice, or unsafe behaviour that is "in the public interest."
This means that the concern affects others — such as pupils, staff, parents, or the wider community — rather than being a personal or private matter.

Examples of Whistleblowing

Whistleblowing concerns at Reality Strikes Academy may include (but are not limited to):

- Criminal activity, such as fraud, theft, or corruption
- Safeguarding failures or actions that place a pupil's or staff member's health, safety, or welfare at risk
- Non-compliance with legal or statutory obligations, including breaches of education or safeguarding regulations
- Serious mismanagement of school funds or financial procedures
- Neglect, abuse, or exploitation of children or vulnerable individuals
- Attempts to conceal wrongdoing or obstruct an investigation
- Damage to the environment or unsafe working practices

Anyone who raises a genuine concern about such matters is known as a whistleblower. Whistleblowers are protected in law under the Public Interest Disclosure Act 1998, provided their concern is raised in good faith and relates to matters of public interest.

What is Not Considered Whistleblowing

Not every concern raised within the school will count as whistleblowing.
For example, issues that affect a staff member personally — such as workplace disputes, bullying, or contractual disagreements — are usually dealt with under the Staff Grievance Procedure or Complaints Policy, rather than through this whistleblowing process.

If a member of staff is unsure whether their concern qualifies as whistleblowing, they should speak confidentially with:

- The Designated Safeguarding Lead (DSL) – *Reuben Bowen*
- The Deputy Designated Safeguarding Lead (DSL) – *Alec Masson*
- The Proprietor of Reality Strikes Academy - *Sam Woodhall*
- Or seek independent advice (see below).

Independent Advice and Support

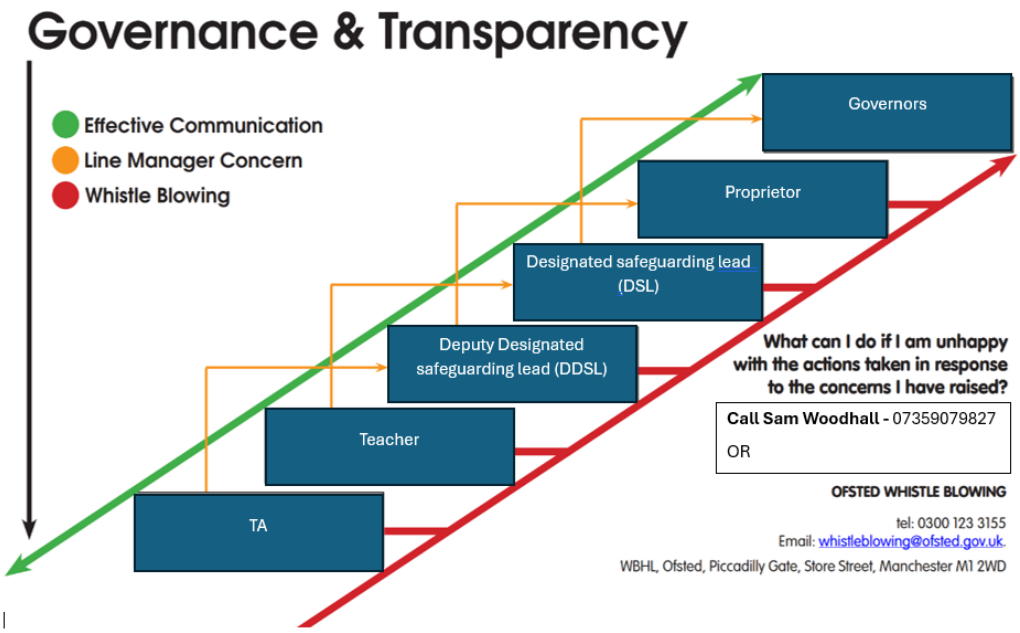
Staff can seek confidential and impartial advice from Protect (formerly Public Concern at Work) — the UK's leading whistleblowing charity.

- Website: www.protect-advice.org.uk

- Free advice line: 020 3117 2520

Protect can help staff clarify whether their concern falls under whistleblowing and guide them on the safest and most appropriate way to report it.

5. Procedure for staff to raise a whistle-blowing concern



5.1 When to Raise a Concern

Staff, volunteers, or contractors should raise a concern under this Whistleblowing Policy if they have reasonable grounds to believe that wrongdoing, malpractice, or unsafe behaviour has occurred, is occurring, or is likely to occur, and that it is in the public interest to report it.

Before deciding to raise a concern, staff should consider whether the issue involves:

- A criminal offence or unlawful act;
- A breach of statutory duty, regulation, or internal policy;
- Conduct that places pupils, staff, or others at risk of harm;
- A failure in safeguarding practice or a breach of professional boundaries;
- Financial mismanagement, fraud, or corruption;

- Misuse of public funds or resources;
- An attempt to conceal wrongdoing or interfere with an investigation.

If the concern relates to a personal or individual grievance (for example, bullying, line management issues, or employment conditions), it should normally be addressed under the Grievance Procedure, unless it also raises wider public interest concerns.

5.2 Who to Report To

Reality Strikes Academy encourages all staff to raise concerns as early as possible.

- In most cases, concerns should be reported directly to the Designated Safeguarding Lead (DSL) – *Reuben Bowen* – who will ensure the matter is recorded and investigated appropriately.
- If the concern involves, or is believed to involve, the DSL, it should be reported directly to the Proprietor of Reality Strikes Academy (*Sam Woodhall in their capacity as Proprietor*). In such cases, the concern will be referred to an independent safeguarding adviser or external agency as appropriate.
- If the concern involves both the DSL and Proprietor, or if a member of staff feels unable to report internally, the concern should be raised with one of the following external contacts:
    - Ofsted Whistleblowing Hotline: 0300 123 3155
    - Local Authority Designated Officer (LADO) – via Dudley MASH (Multi-Agency Safeguarding Hub)
    - Protect (formerly Public Concern at Work) – 020 3117 2520
    - SeeHearSpeakUp independent whistleblowing service (details below).

Staff may also contact the Department for Education (DfE) or the NSPCC Whistleblowing Advice Line if they believe the concern relates to safeguarding and cannot be addressed within the school.

5.3 How to Raise a Concern

Concerns can be raised in writing, by email, or verbally. Written concerns are encouraged where possible, as they help to ensure clarity and accuracy.

When raising a concern, staff should include:

- What the concern is about (include relevant facts, names, dates, and locations if known);
- Why they believe the concern is genuine;
- Any evidence they may have or know of;
- Details of any personal involvement or conflict of interest.

Concerns can be raised internally by:

- Speaking directly to the DSL or Deputy DSL;
- Emailing the DSL at info@realitystrikes.co.uk with the subject line “Confidential – Whistleblowing Concern”.

Alternatively, concerns can be raised externally and confidentially through:

- SeeHearSpeakUp, an independent, external whistleblowing service available 24/7, 365 days a year, which allows anonymous reporting.
    - Website: https://fileaconcern.org/compassgroupsupport
    - Reports can be made anonymously, and SeeHearSpeakUp will only share your personal details with Reality Strikes Academy if you give consent.

Staff are encouraged to provide their contact details when possible to enable appropriate follow-up and feedback. However, anonymous reports will still be taken seriously and investigated where sufficient information is available.

5.4 Confidentiality and Protection

Reality Strikes Academy is committed to treating all concerns raised in good faith with the strictest confidence. The identity of a whistleblower will not be disclosed without their consent unless required by law.

No member of staff will suffer dismissal, detriment, or victimisation for raising a legitimate concern under this policy — even if the concern proves to be unfounded.
However, any deliberately false or malicious allegations may be treated as a disciplinary matter.

6. Procedures for Responding to a Whistleblowing Concern

At Reality Strikes Academy, all whistleblowing concerns are taken seriously and handled with sensitivity, fairness, and confidentiality.
The following procedures outline how concerns will be received, recorded, investigated, and resolved.

6.1 Initial Receipt of a Concern

1. Acknowledgement
    - When a concern is raised, it will be acknowledged by the Designated Safeguarding Lead (DSL) or, where appropriate, the Proprietor, within five (5) working days.
    - The whistleblower will be informed that their concern has been received and will be investigated.
2. Recording the Concern
    - The DSL will make a written record of the concern (or upload it securely to CPOMS where appropriate), including:
        - The date and nature of the concern.
        - The person raising the concern (if known).
        - Any evidence or supporting details provided.
        - Initial actions taken and rationale.
3. Confidentiality
    - Every effort will be made to maintain confidentiality throughout the process.
    - The identity of the whistleblower will only be disclosed with their consent, unless legally required.
    - Anonymous concerns will still be considered where sufficient detail is provided to allow an investigation.

6.2 Preliminary Assessment

The DSL (or Proprietor, if the concern involves the DSL) will carry out an initial assessment to determine:

- Whether the concern falls within the scope of whistleblowing (i.e., a public interest matter);
- The level of potential risk to pupils, staff, or the organisation;
- Whether the matter should be referred to an external agency such as the Local Authority Designated Officer (LADO), Ofsted, or the Police.

If it is clear that the concern involves:

- Safeguarding or child protection – the matter will immediately follow the school's Safeguarding and Child Protection Policy.
- Criminal activity – it will be referred to the police.
- Allegations against staff – it will be handled in accordance with the Managing Allegations Against Staff Policy.

The whistleblower will be informed of the outcome of this initial assessment (e.g., whether the concern will proceed to investigation, referral, or closure).

6.3 Formal Investigation

If a full investigation is warranted, the following steps will be taken:

1. Appointment of an Investigator
    - The Proprietor or DSL will appoint an appropriate and impartial person to lead the investigation.
    - Where the concern involves either the DSL or Proprietor, an independent safeguarding adviser or external investigator may be appointed.
2. Conduct of the Investigation
    - The investigation will be carried out promptly, objectively, and confidentially.
    - Relevant evidence, documentation, and witness statements will be collected.
    - The investigator may meet with the whistleblower to clarify details or gather additional information.

- Every effort will be made to conclude the investigation within 20 working days, although complex cases may take longer.

3. Outcome of the Investigation
    - The investigator will produce a written report summarising:
        - The nature of the concern.
        - The evidence considered.
        - Findings and conclusions.
        - Any recommended actions or learning points.
    - The report will be shared with the Proprietor and, where applicable, relevant external authorities.

6.4 Feedback to the Whistleblower

- The whistleblower will be informed, in general terms, of the outcome of the investigation and any actions taken, unless doing so would breach confidentiality or legal restrictions.
- Feedback will normally be provided within 10 working days of the investigation concluding.
- Full details of disciplinary or personnel action will not be shared for confidentiality reasons.

6.5 Escalation and External Reporting

If the whistleblower:

- Feels that their concern has not been properly addressed, or
- Believes there has been a failure to act,

they may escalate the matter externally to:

- Ofsted Whistleblowing Hotline: 0300 123 3155
- Local Authority Designated Officer (LADO) – via Dudley MASH
- Department for Education (DfE)

- Protect (formerly Public Concern at Work): 020 3117 2520
- SeeHearSpeakUp independent reporting service: https://fileaconcern.org/compassgroupsupport

Reality Strikes Academy will not treat escalation negatively where it is done in good faith and in the public interest.

6.6 Learning and Follow-Up

After a whistleblowing investigation concludes, the DSL and Proprietor will:

- Review outcomes and identify any lessons learned.
- Consider whether policy, training, or systems need to be updated.
- Record findings and actions taken in the Whistleblowing Log for audit and accountability.
- Ensure that any ongoing welfare or safety issues are monitored through appropriate channels (e.g., supervision, safeguarding meetings).

6.7 Protection and Support for Whistleblowers

Reality Strikes Academy is committed to protecting all whistleblowers from victimisation or unfair treatment.
No one will be dismissed, disciplined, demoted, or harassed for raising a genuine concern, even if it is later found to be unsubstantiated.

Where a whistleblower experiences distress or anxiety as a result of raising a concern, they will be offered appropriate pastoral or wellbeing support, including access to supervision or external advice services.

Malicious or deliberately false allegations, however, may be treated as a disciplinary matter.

7. False and Malicious allegations

At **Reality Strikes Academy**, we actively encourage all staff, volunteers, and contractors to **speak up and raise concerns** whenever they believe there may be wrongdoing, risk, or unsafe practice — even if they are unsure or lack full evidence.

Staff will **not face any disciplinary action or disadvantage** for raising a concern in **good faith**, where the concern was genuine and made with the intention of protecting pupils, colleagues, or the integrity of the Academy, **even if an investigation finds no evidence of wrongdoing**.

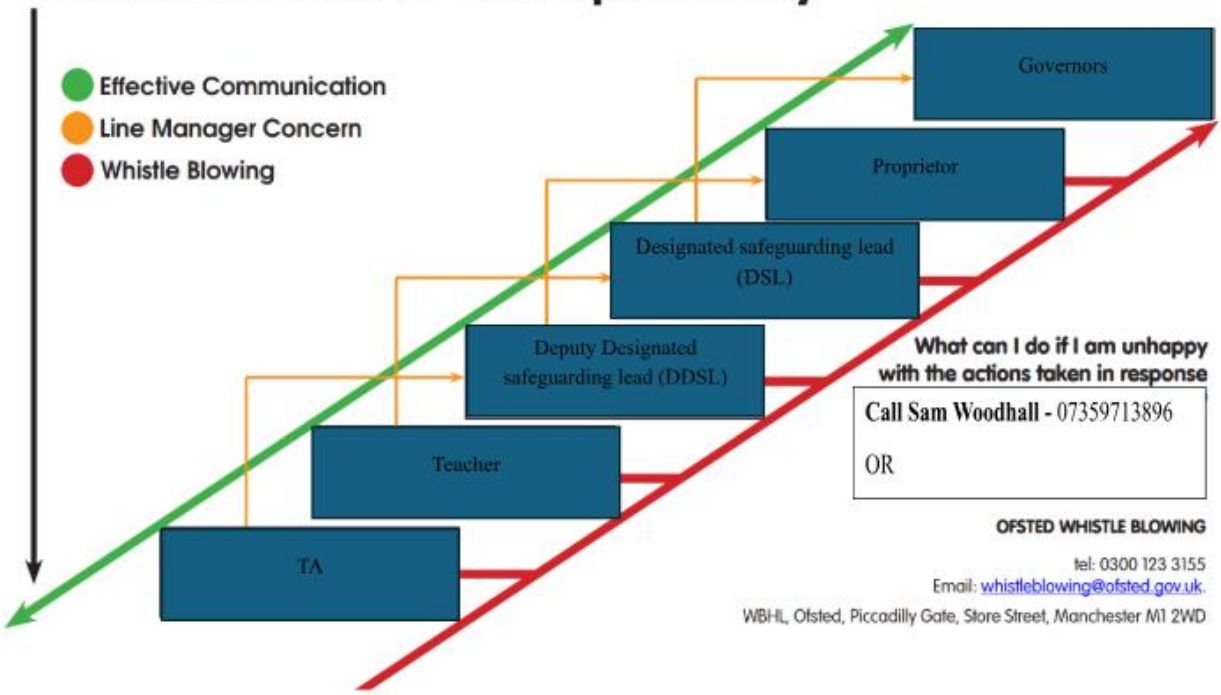
However, where an allegation or report is found to be **deliberately false, malicious, or made with the intent to cause harm**, the matter will be treated seriously. In such cases, **Reality Strikes Academy** will consider appropriate action under the **Staff Code of Conduct** and **Disciplinary Policy**, ensuring fairness and due process.

This approach ensures that staff feel safe and supported to raise concerns responsibly, while maintaining the integrity and trust that underpin our safeguarding culture.

Approval
Approved by:
Sam Woodhall – Director & Proprietor
Date: 05/08/2026
Next Review: September 2027

Appendix 1.

Governance & Transparency



What can I do if I am unhappy with the actions taken in response

Call Sam Woodhall - 07359713896

OR

OFSTED WHISTLE BLOWING

tel: 0300 123 3155
Email: whistleblowing@ofsted.gov.uk.
WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD