



Whistleblowing Policy and Procedure

Document reference	DT-P-01.7
Document type	Policy and procedure
Revision	A – September 2026
Effective date	01 September 2026
Owner / approver	Leadership and Management Team
Next review	September 2027, or earlier following legal, regulatory or organisational change

CONTROL PURPOSE This document gives every employee, agency worker, student and volunteer a clear, protected route to raise concerns about poor or unsafe practice. It replaces the policy formerly coded DTBKC-P-01.7.

1. Purpose

Dottie Tots Nursery School is committed to an open safeguarding culture in which concerns are raised early, listened to and acted upon. No person should assume that someone else will report unsafe practice. The welfare of children takes priority over loyalty to a colleague, manager or the organisation.

2. Scope and meaning

This policy applies to employees, workers, agency staff, students, apprentices and volunteers at Bentley and Kingsley. It covers information reasonably believed to show wrongdoing, danger, concealment or poor or unsafe practice affecting children, staff, families, the public or the organisation, including:

- a child safeguarding or welfare risk, or failure to act on one;
- an allegation, low-level concern, unsafe professional boundary or unsuitable adult;
- a criminal offence, breach of legal or regulatory duty, miscarriage of justice, danger to health and safety, or environmental damage;
- fraud, financial malpractice, dishonest record keeping or misuse of public funding;
- serious breach of policy, professional standards or regulatory requirements; or
- deliberate concealment, destruction of evidence or retaliation against a person who raised a concern.

A personal employment complaint about the worker's own treatment normally belongs under the Grievance Policy. A parent complaint belongs under DT-P-10.4. Where information also indicates wrongdoing or a safeguarding risk, the whistleblowing and safeguarding routes still apply.

3. Legal and statutory framework

EYFS paragraphs 3.7–3.8 require appropriate whistleblowing procedures for all staff, including students and volunteers. The procedure must explain when and how to report, what happens after a report, and ensure that staff feel able to raise concerns and know that senior leaders will take them seriously.

Eligible workers may also have statutory protection under Part IVA of the Employment Rights Act 1996, as inserted by the Public Interest Disclosure Act 1998. Dottie Tots applies its internal protection against retaliation to everyone within this policy, although the precise statutory rights of volunteers and others depend on their legal status.

4. Our commitments

- A genuine concern may be raised without proof. The person should explain the information and why it causes concern.
- A person will not be penalised for being mistaken where the concern was honestly held and raised appropriately.
- Victimisation, dismissal, disadvantage, threats or pressure because someone raised or supported a genuine concern will not be tolerated.
- Knowingly false or malicious allegations may be considered under conduct procedures; a concern that is not substantiated is not, by itself, malicious.

DOTTIE TOTS NURSERY SCHOOL | POLICY AND PROCEDURE

- Confidentiality will be protected as far as reasonably possible, but anonymity cannot be guaranteed where legal action, safeguarding or a fair process requires disclosure.
- No confidentiality clause or instruction prevents a protected disclosure, safeguarding referral, report to police or contact with an appropriate regulator.

5. When to act immediately

DO NOT WAIT FOR THE INTERNAL PROCESS. If a child is in immediate danger, call 999. A concern about a child's safety or welfare must be passed immediately to the DSL and referred to Hampshire Children's Services where required. A concern about a person working with children must follow DT-PR-01.1A; basic safety information may be obtained, but an internal investigation or witness interview must not begin before safeguarding and LADO advice where the allegations criteria may be met.

6. Internal reporting routes

Situation	Report to
Usual first route	Nursery Manager / DSL or the person's line manager
Concern about, or conflict involving, the Manager / DSL	Head of Operations, DSO / Ofsted Nominated Individual, or the other Nursery Manager / DSL
Concern about the Head of Operations	DSO / Ofsted Nominated Individual or another Company Director
Concern about the DSO / Ofsted Nominated Individual	The other Company Director and an appropriate external safeguarding or regulatory route
Internal route feels unsafe, has failed or may lead to concealment	Use an external route in section 8 without delay

A concern may be raised verbally or in writing. Use whichever safe route is most appropriate:

The recipient must listen, make a dated record in the reporter's own words as far as possible, confirm any immediate risk, preserve evidence, explain the next safe step and pass the concern promptly to the responsible person. Email may be sent to hello@dottietots.co.uk, but urgent safeguarding information must also be reported directly.

7. What happens after a report

- Immediate safety and safeguarding action is taken first.
- The concern is acknowledged promptly where the reporter can be contacted.
- A restricted record is opened and conflicts of interest are checked.
- The concern is classified: child safeguarding; allegation or low-level concern; regulatory notification; employment grievance; misconduct; financial or other wrongdoing. More than one route may apply.
- An appropriately independent person coordinates the response. LADO, police, children's social care, Ofsted, legal or professional advice may determine what internal enquiries are permitted.
- The reporter may be asked for clarification and evidence but is not responsible for investigating or proving the case.
- The reporter is told that the concern has been considered and, where lawful, whether action has been taken. Confidentiality may prevent disclosure of personal, safeguarding or disciplinary detail.
- Actions and learning are followed through, and any retaliation or attempt to conceal information is treated as a separate serious concern.

No fixed internal timescale overrides an immediate safeguarding duty, the Hampshire LADO route, or the 14-day Ofsted notification deadline for allegations of harm or abuse. Other concerns will be progressed without unreasonable delay and the reasons for any material delay recorded.

8. External reporting and advice

A person may use an external route where they feel unable to raise the matter internally, believe it is not being addressed, need confidential advice, or believe urgent independent action is required.

Route	When / purpose	Contact
NSPCC Whistleblowing Advice Line	Confidential advice about how child-protection concerns are being handled	0800 028 0285; help@nspcc.org.uk

Ofsted	Concern that registered childcare is not meeting requirements or operating safely	0300 123 4666; enquiries@ofsted.gov.uk
Hampshire LADO	Allegation or suitability concern about an adult working with children	01962 876364; child.protection@hants.gov.uk
Hampshire Children's Services	Concern about a child's safety or welfare	0300 555 1384; out of hours 0300 555 1373
Police	Immediate danger or suspected crime	999 in an emergency; otherwise 101
Independent legal advice	Advice on statutory whistleblowing protection and prescribed persons	www.gov.uk/whistleblowing

A disclosure outside the organisation should be accurate, proportionate and made to an appropriate body. Staff must not investigate independently, access records without authority, remove originals, post information publicly or disclose children's or families' information more widely than necessary.

9. Anonymous and confidential reports

Anonymous reports will be assessed and acted upon where sufficient information exists. Providing a safe means of contact can help clarification and feedback. A person requesting confidentiality will be told if their identity may need to be disclosed, for example to protect a child, comply with law or ensure a fair process. Any decision will be limited to what is necessary and recorded.

10. Records and information handling

- Whistleblowing records are kept separately from routine supervision or personnel records unless an employment action requires a defined record.
- The record includes the concern, date, reporting route, risk decisions, referrals, evidence preservation, actions, outcome, feedback and any retaliation concern.
- Access is restricted to people with a professional need. Records are retained under the applicable safeguarding, allegation, employment, regulatory and data-retention rules.
- The reporter's identity and the identities of children, families and other people are not shared beyond what is necessary and lawful.

11. Leadership, induction and assurance

- The Company Director / Ofsted Nominated Individual / DSO retains oversight and ensures an alternative route where they are conflicted.
- Nursery Managers / DSLs make this procedure accessible and create a culture in which professional challenge is welcomed.
- All employees, agency workers, students and volunteers are shown the internal and external routes during induction and refreshed at least annually.
- Staff must be able to explain where they would report a concern about their manager or the DSO; signatures alone are not treated as evidence of competence.
- Themes, response quality, delay, retaliation and completed learning are reviewed without exposing unnecessary personal information.

12. Related controlled documents

Reference	Document
DT-P-01.1	Child Protection and Safeguarding Policy
DT-PR-01.1A	Managing Allegations, Low-Level Concerns and LADO Procedure
DT-PR-01.1B	Ofsted Notifications and Significant Events Procedure
DT-P-05.2	Staff Code of Conduct
DT-P-10.4	Complaints Policy and Procedure
DT-R-00.1	Consequential Amendments and Policy Replacement

	Schedule
--	----------

13. Legal and regulatory references

- Early Years Foundation Stage statutory framework for group and school-based providers, effective 1 September 2026, paragraphs 3.7–3.10.
- Employment Rights Act 1996, Part IVA, and Public Interest Disclosure Act 1998.
- Childcare Act 2006; Children Act 1989 and 2004; Data Protection Act 2018 and UK GDPR.
- Working Together to Safeguard Children; Hampshire Safeguarding Children Partnership procedures.
- GOV.UK: Whistleblowing for employees; Ofsted complaints procedure.

14. Approval and implementation record

Role	Name	Signature	Date
Company Director / Ofsted Nominated Individual / DSO			
Head of Operations			
Bentley Nursery Manager / DSL			
Kingsley Nursery Manager / DSL			