



Kick Start Futures

Whistleblowing Policy

Speak Up • Be Heard • Keep People Safe

Policy Date: August 2026

Review Date: August 2027

1. Policy Statement

Kick Start Futures is committed to maintaining a culture of **openness, honesty and accountability**.

Staff should feel able to raise genuine concerns about wrongdoing, unsafe practice or safeguarding without fear that they will be ignored or treated unfairly for speaking up.

We would rather know about a concern early and have the opportunity to address it than allow unsafe or inappropriate practice to continue.

No member of staff should assume:

"Someone else will deal with it."

If something appears seriously wrong, staff have a responsibility to speak up.

2. Purpose

This policy aims to:

- encourage staff to raise serious concerns promptly;
- provide clear routes for reporting concerns;
- ensure concerns are considered appropriately;
- protect those who raise qualifying concerns from unlawful detriment;
- promote a culture where unsafe or inappropriate practice is challenged;
- ensure safeguarding remains everyone's responsibility.

3. Who Does This Policy Apply To?

This policy applies to people working for or on behalf of KSF, including:

- employees;
- agency and temporary workers;
- volunteers;
- coaches;
- students on placement;
- contractors where applicable.

The legal protections available under whistleblowing legislation depend upon an individual's employment status and the nature of the disclosure.

Regardless of legal status, KSF encourages anyone working within the provision to raise genuine concerns about unsafe or inappropriate practice.

4. What is Whistleblowing?

Whistleblowing is the reporting of information about suspected wrongdoing or danger in the workplace where the concern is in the **public interest**.

This may include concerns that:

- a criminal offence has been, is being or is likely to be committed;
- someone has failed to comply with a legal obligation;
- there has been a miscarriage of justice;
- health and safety is being endangered;
- the environment is being damaged;
- information about wrongdoing is being deliberately concealed.

Within an education and safeguarding environment, whistleblowing may also be relevant where staff believe serious unsafe practice is occurring and normal reporting routes have not addressed the concern appropriately.

5. Whistleblowing and Safeguarding

Staff have a particular responsibility to speak up where they believe children may be unsafe.

Examples could include:

- safeguarding concerns being ignored;
- concerns about adult behaviour not being reported;
- unsafe recruitment practices;
- failure to follow safeguarding procedures;
- inappropriate relationships or professional boundaries;
- deliberate concealment of safeguarding information;
- pressure not to report concerns;
- repeated unsafe practice.

Where a child may be at immediate risk, staff should follow the **Safeguarding and Child Protection Policy immediately** rather than waiting for a whistleblowing process.

6. Whistleblowing, Grievances and Low-Level Concerns

These procedures have different purposes.

Whistleblowing

Usually concerns serious wrongdoing or unsafe practice affecting others or the wider public interest.

Grievance

Usually concerns something affecting the member of staff personally, such as their own working conditions or treatment at work.

Low-Level Concern

Concerns adult behaviour towards children that is inconsistent with expected professional standards but does not appear to meet the harm threshold.

Staff do not need to determine the correct policy before speaking up.

Raise the concern and KSF will determine the appropriate process.

7. How to Raise a Concern

Staff should normally raise a whistleblowing concern with the **Education & Provision Lead**.

Concerns may initially be raised verbally, but significant concerns should be recorded in writing as soon as possible.

The report should explain:

- what the concern is;
- what happened;
- when and where it occurred;
- who may be involved;
- any relevant evidence or information;
- whether the concern has previously been raised.

Staff are not expected to prove wrongdoing before reporting it.

A reasonable and genuine concern is enough to speak up.

8. Concerns About Senior Leaders

Staff must always have a route for raising concerns that does not depend upon the person they are concerned about.

Where the concern relates to the **Education & Provision Lead**, it should be raised with an appropriate Director.

Where the concern relates to a Director, or the member of staff reasonably believes the usual internal route is inappropriate, they should raise it with another appropriate Director or seek advice through an appropriate external route.

Where the concern relates to safeguarding, advice may be sought directly from the **Local Authority Designated Officer (LADO)** or other relevant safeguarding authority where appropriate.

9. How KSF Will Respond

KSF will take genuine whistleblowing concerns seriously.

Depending on the circumstances, the person receiving the concern may:

- seek further information;
- review relevant records;
- take immediate safeguarding or safety action;
- seek HR or legal advice;
- refer the matter through safeguarding procedures;
- contact the LADO;
- refer the matter to another appropriate authority;
- commission an appropriate investigation.

The person who raised the concern will normally be informed that it has been considered and, where possible, given appropriate feedback.

There may be limits on the information that can be shared because of confidentiality, safeguarding or employment requirements.

10. Confidentiality

KSF will treat whistleblowing concerns sensitively and will seek to protect the identity of the person raising the concern wherever reasonably possible.

However, there may be circumstances where information must be shared in order to:

- safeguard a child;
- investigate the concern properly;
- comply with legal obligations;
- provide another person with a fair opportunity to respond.

Where possible, this will be discussed with the person who raised the concern.

11. Anonymous Concerns

Concerns raised anonymously will be considered.

However, anonymity may make it more difficult to:

- clarify information;
- investigate fully;
- establish the reliability of information;
- provide feedback.

KSF therefore encourages staff to identify themselves when raising concerns wherever they feel able to do so.

12. Protection for Staff Who Speak Up

KSF will not tolerate victimisation or retaliation against someone because they have raised a genuine concern.

Workers who make a **protected disclosure** may have specific legal protection under the **Employment Rights Act 1996**, as amended by the **Public Interest Disclosure Act 1998**.

Anyone who believes they are being treated unfairly because they raised a genuine concern should report this promptly.

13. Deliberately False or Malicious Allegations

A concern raised genuinely will not result in action against the person raising it simply because it turns out to be mistaken or unsubstantiated.

This is important.

Staff should never remain silent because they are worried that they might be wrong.

However, knowingly making a deliberately false or malicious allegation is different and may result in appropriate action.

14. If the Concern Is Not Addressed

There may be circumstances where a member of staff reasonably believes:

- their concern has not been addressed;
- they cannot safely raise it internally;
- senior leaders are involved;
- evidence may be concealed;
- there is an immediate or serious risk.

Depending on the nature of the concern, it may be appropriate to seek advice or raise the matter with an external body.

This may include:

- the Local Authority or LADO for relevant safeguarding matters;
- the Health and Safety Executive for relevant health and safety concerns;
- the Disclosure and Barring Service where appropriate;
- the Police where criminal activity or immediate danger is suspected;
- another relevant prescribed person or regulatory body.

Staff considering an external disclosure are encouraged to seek independent advice where appropriate to ensure they use the correct route.

15. NSPCC Whistleblowing Advice Line

Where a member of staff has concerns about how child protection issues are being handled within KSF, they may also seek independent advice through the **NSPCC Whistleblowing Advice Line**.

Current contact information will be made available to staff through KSF safeguarding information and should be checked against the current NSPCC service before use.

This provides an additional route for adults who are concerned about safeguarding practice within an organisation.

16. Salisbury FC

KSF operates within Salisbury FC, but KSF and the football club have their own organisational responsibilities.

If KSF staff witness serious wrongdoing or safeguarding concerns involving a Salisbury FC employee, volunteer, contractor or other adult interacting with KSF students, they should **still report the concern through KSF safeguarding or whistleblowing procedures**.

KSF leadership will ensure the concern is shared with the appropriate person or organisation where necessary.

Staff should never assume that a concern is "the football club's problem" simply because the individual involved is not employed by KSF.

17. Record Keeping

Whistleblowing concerns and the action taken will be appropriately recorded and stored securely.

Records will be handled confidentially and in accordance with data protection requirements.

Information will only be accessible to those with a legitimate reason to see it.

18. Staff Awareness

This policy will be made available to staff as part of induction.

Staff will be reminded that:

- safeguarding is everyone's responsibility;
- concerns should be raised early;
- they do not need proof before speaking up;
- they can raise concerns about senior staff;
- external routes exist where internal reporting is inappropriate or ineffective.

Leaders have a responsibility to create an environment where staff feel **safe to challenge and safe to be challenged**.

19. Monitoring and Review

The Directors will maintain oversight of KSF's whistleblowing arrangements.

This policy will be reviewed annually or sooner where:

- legislation changes;
- statutory safeguarding guidance changes;
- organisational arrangements change;
- experience identifies improvements that should be made.

20. Related Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy;
- Staff Code of Conduct;
- Low-Level Concerns Policy;
- Safer Recruitment Policy;
- Health & Safety Policy;
- Complaints Policy;
- Grievance and Disciplinary procedures.

21. Our Commitment

A safe organisation is not one where concerns never arise.

It is one where people are **confident enough to speak when they do**.

At Kick Start Futures, nobody's position or seniority should prevent a genuine concern from being raised.

If you believe something is seriously wrong:

Do not ignore it.

Do not assume somebody else will report it.

Speak up.

You do not need to have all the answers and you do not need to prove your concern before raising it.

Speak up. Be heard. Keep people safe.