



The **Daffodil** Project CIC

Whistleblowing Policy

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1. Policy Statement

The Daffodil Project CIC is committed to the highest standards of integrity, transparency, and child protection. We actively encourage a culture in which staff, volunteers, trustees, and others feel confident to raise concerns about wrongdoing without fear of reprisal. Whistleblowing plays a crucial role in safeguarding children and vulnerable individuals, and is a key pillar of effective risk management and ethical governance. This policy provides a safe and clearly defined process for reporting serious concerns about malpractice, misconduct, or the welfare of a child or adult.

- Foster an open culture where staff are empowered to raise concerns safely and without fear
 - Treat all whistleblowing disclosures seriously, sensitively, and promptly
 - Comply fully with UK whistleblowing legislation and safeguarding duties
 - Ensure that no whistleblower suffers detriment for speaking up in good faith
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2. Scope

This policy applies to:

- All current or former employees of The Daffodil Project CIC
- Volunteers, trainees, and placement students
- Trustees, contractors, consultants, or temporary staff
- External professionals or partners who have reasonable grounds for concern

It covers disclosures relating to conduct or incidents within the organisation, whether witnessed first-hand or known through credible information, and applies in both physical and virtual working contexts.

This policy is not intended to replace:

- **Grievance procedures** (for personal employment disputes)
 - **Safeguarding procedures** (for immediate child protection action) – though whistleblowing can be used if concerns are not acted on internally
 - Applies to all individuals involved in, or connected with, the organisation
 - Covers both current and former staff and volunteers
 - Can be used alongside other policies where needed, particularly where concerns have not been addressed
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3. Legal Framework

This policy is compliant with the following laws and regulatory standards:

- **Public Interest Disclosure Act 1998 (PIDA)**
- **Employment Rights Act 1996 (as amended by PIDA)**
- **Children Act 1989 & 2004** – Safeguarding duties to report harm or risk
- **Working Together to Safeguard Children (2018)**
- **UK GDPR and Data Protection Act 2018** – Protecting whistleblower identity and sensitive data
- **Ofsted Education Inspection Framework (2022)** – Expectations for safe cultures and transparent safeguarding

4. What is Whistleblowing?

Whistleblowing is the disclosure of information by a worker or affiliated individual which they reasonably believe shows wrongdoing, risk, or harm that is in the **public interest**. Unlike a grievance, which relates to a personal concern, whistleblowing involves concern for others—particularly children, colleagues, the public, or the organisation's integrity.

To qualify for protection under the law, the disclosure must be:

- **Made in the public interest**
- **About a relevant wrongdoing** (see Section 5)
- **Made to an appropriate person or body**

The Daffodil Project CIC welcomes disclosures raised internally in the first instance, and encourages open, professional dialogue to address concerns at the earliest stage.

5. Examples of Concerns Covered

Whistleblowing concerns might include (but are not limited to):

- **Safeguarding failures**, such as inappropriate behaviour by staff, failure to act on disclosures, or unsafe supervision of children
 - **Health and safety breaches** that place children, staff, or animals at risk
 - **Neglect, abuse, or unsafe practices** within therapeutic or care activities
 - **Unlawful activity**, such as theft, fraud, misuse of public funds or equipment
 - **Deliberate non-compliance with statutory duties**, including record-keeping, SEND obligations, or safeguarding thresholds
 - **Breach of confidentiality** in relation to sensitive child, family, or safeguarding data
 - **Racism, ableism, or discriminatory practice** that impacts staff or families
 - **Attempts to cover up wrongdoing** or intimidate staff from reporting
 - Includes any action, inaction, or systemic issue that compromises safety or ethics
 - Covers repeated unsafe conduct, isolated serious incidents, or patterns of neglect
 - May relate to any person working within the organisation, including senior leadership
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6. Safeguards for Whistleblowers

We understand that speaking out can feel difficult and carries personal risk. The Daffodil Project CIC makes the following firm commitments:

- **No whistleblower will be dismissed, demoted, penalised, victimised, or disadvantaged** for making a protected disclosure in good faith
- **We will not tolerate any form of retaliation**, bullying, or harassment towards a whistleblower from colleagues or management
- **Where requested and appropriate, we will take all reasonable steps to protect your identity and treat your concerns confidentially**
- **We will provide feedback on the outcome of any investigation**, where lawful and appropriate to do so
- **We will support staff raising concerns with external agencies**, such as Ofsted or the Local Authority Designated Officer (LADO), if internal routes are exhausted or unsafe

- Provide reassurance and legal protection for individuals raising concerns
 - Respond swiftly to any retaliatory behaviour or intimidation
 - Maintain confidentiality and psychological safety throughout the process
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7. How to Raise a Concern

Concerns can be raised verbally or in writing. The recommended internal contacts are:

Step 1 – Speak to your Line Manager or Supervisor

If the concern is about unsafe or unethical conduct within your team or setting.

Step 2 – Contact the Director (Magdalena van de Voort)

If the concern involves senior staff or has not been addressed at Step 1.

Step 3 – Contact the Designated Safeguarding Lead (DSL)

For any safeguarding-related concerns or failures to follow child protection procedures.

Step 4 – Escalate to an External Body

If you feel the concern cannot be raised internally or remains unresolved. External options include:

- Ofsted Whistleblowing Hotline: 0300 123 3155
- NSPCC Whistleblowing Advice Line: 0800 028 0285
- Local Authority Designated Officer (LADO) – for allegations against staff
- Information Commissioner's Office (ICO) – for data-related breaches

You are encouraged to raise concerns as soon as possible. Concerns may be raised anonymously, but doing so may limit our ability to investigate thoroughly.

8. Investigation Process

Upon receiving a whistleblowing disclosure:

1. **Initial acknowledgement** will be made within 5 working days.
2. A **confidential meeting** will be offered to understand the concern in detail.
3. A **decision will be made about how to proceed**, which may involve internal investigation, safeguarding referral, HR procedure, or external agency involvement.
4. Where appropriate, **interim measures** will be put in place to protect children and whistleblower.
5. A **designated investigator** will be appointed who is impartial and trained.
6. The whistleblower will be **updated on the progress and outcome**, within legal and privacy boundaries.
7. All findings and actions will be **documented and reviewed by the Director and/or DSL**.

If the concern involves criminal activity, police and safeguarding authorities will be informed immediately.

- Ensure all concerns are formally acknowledged and recorded
- Investigate impartially and proportionately
- Act on findings to prevent recurrence and protect children

9. Confidentiality

Wherever possible, the identity of the whistleblower will be kept confidential. However:

- If the concern results in formal disciplinary or legal action, the whistleblower may be required to give evidence
- Anonymous reports may still be investigated if sufficient information is provided
- Whistleblowers are encouraged to identify themselves in order to receive feedback, protection, and support

Information about the concern and investigation will be kept on a **need-to-know** basis and stored in accordance with our Data Protection & Safeguarding Policies.

- Respect whistleblower confidentiality to the highest reasonable degree
 - Inform individuals clearly where identity may be disclosed by law
 - Keep sensitive information securely and access-limited
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10. Monitoring & Review

- This policy is reviewed annually by the Director and Designated Safeguarding Lead.
- A register of whistleblowing reports is maintained (anonymised), detailing the nature of concern, actions taken, and outcomes.
- All learning from whistleblowing investigations is used to improve training, practice, and policy.
- Staff receive training on whistleblowing as part of induction and annually during safeguarding updates.
- The effectiveness of this policy is tested through scenario discussions, supervision, and team meetings.
- Regular review ensures transparency, accountability, and learning
- Training reinforces staff confidence in whistleblowing procedures
- Policy is adjusted in line with safeguarding legislation and inspection feedback

Signed:

Magdalena Van De Voort



Director, The Daffodil Project CIC

Date: January 2026