



Roar Trails Whistleblowing Policy

Policy checking table

Effective Date:	September 2026
Responsible post holder:	HR Manager
Approved by:	Directors / SLT
Review frequency:	Biannual and sooner where required
Next Review:	September 2029

1. Introduction & Purpose

Roar Trails is committed to maintaining an open, honest, and accountable culture across all operations, including alternative provision, outdoor learning, and mentoring programs. Effective and confidential communication is essential to ensure malpractice, wrongdoing, and safeguarding failures are addressed promptly and effectively.

This policy provides clear guidelines for all Roar Trails personnel—including full-time and part-time employees, casual and temporary agency staff, freelancers, volunteers, trainees, and contractors—who need to raise serious concerns in confidence without fear of reprisal, detriment, or victimisation.

This procedure is separate from the Grievance and Disciplinary Policy and is specifically designated for disclosures made in the public interest.

2. Statutory & Legal Framework

This policy complies with:

- **Public Interest Disclosure Act 1998 (PIDA)** and the **Employment Rights Act 1996**.
- **Keeping Children Safe in Education (KCSIE) 2026** statutory guidance.
- **Crime and Policing Act 2026** (including the removal of the supervision exemption from regulated activity).
- **Worker Protection (Amendment of Equality Act 2010) Act** and associated UK whistleblowing regulations.
- **Working Together to Safeguard Children 2026**.



3. Qualifying Disclosures

Under whistleblowing law, a "qualifying disclosure" means any disclosure of information made in the public interest which a worker reasonably believes demonstrates one or more of the following:

1. **Criminal Offences:** A criminal offence has been committed, is being committed, or is likely to be committed.
2. **Breach of Legal Obligations:** A person or organisation has failed, is failing, or is likely to fail to comply with any legal obligation.
3. **Miscarriages of Justice:** A miscarriage of justice has occurred, is occurring, or is likely to occur.
4. **Health and Safety Risks:** The health, safety, or well-being of any individual (including young people, staff, or visitors) has been, is being, or is likely to be endangered.
5. **Environmental Damage:** The environment has been, is being, or is likely to be damaged.
6. **Sexual Harassment:** Sexual harassment or unwanted conduct of a sexual nature in the workplace or provision environment (explicitly protected under whistleblowing law against detriment and unfair dismissal).
7. **Safeguarding & Child Protection Failures:** Failures to adhere to safeguarding policies, failure to report abuse, or concealing risks to children/vulnerable adults.
8. **Concealment:** Information showing any matter falling within the above categories has been, is being, or is likely to be deliberately concealed.

4. Protection & Confidentiality

4.1 Legal Protection from Detriment

If you raise a genuine concern under this policy in the public interest, you will not suffer any detriment, dismissal, or risk to your position or career at Roar Trails, regardless of whether the concern is ultimately substantiated, provided you acted in good faith.

4.2 Protection Against Victimisation

Roar Trails maintains a strict zero-tolerance policy towards the victimisation, bullying, or harassment of anyone raising a whistleblowing concern. Any individual engaging in retaliatory behavior will be subject to formal disciplinary action up to summary dismissal.

4.3 Confidentiality

Roar Trails will respect and protect your identity if you ask for your concern to be kept confidential. Your identity will not be disclosed without your consent unless required by law or a court order. If an investigation requires your identity to be disclosed (e.g., in a disciplinary hearing or court proceeding), this will be discussed with you in advance.



4.4 Anonymous Disclosures

While workers are encouraged to put their name to disclosures to enable thorough investigation and feedback, anonymous concerns will be considered and investigated at the discretion of the HR Manager and Directors based on the seriousness of the issue and evidence provided.

5. Procedure for Raising a Concern

Stage 1: Internal Reporting (Line Manager)

In the first instance, concerns should be raised orally or in writing to your direct Line Manager or a Senior Leadership Team (SLT) member. Clearly outline the facts, dates, individuals involved, and any supporting evidence.

Stage 2: HR Manager & Directors Escalation

If you feel unable to raise the concern with your Line Manager, or if the concern involves your Line Manager, report directly to:

- **HR Manager:** Tanya Winter (hr@roartrails.co.uk)
- **Director:** Richard Bushell-Torr (rich@roartrails.co.uk)
- **SLT:** Dieter Rust (Dieter.rust@roartrails.co.uk) or Beth Weller (beth.weller@roartrails.co.uk)

Stage 3: Investigation & Response

Upon receiving a report:

- The receiving officer will acknowledge receipt promptly and assess the appropriate course of action.
- Enquiries and investigations will be initiated, maintaining confidentiality.
- You will be informed who is handling the matter and receive written updates and feedback, subject to legal confidentiality duties owed to others.

Stage 4: Dissatisfaction & Independent Internal Escalation

If you are dissatisfied with the response or investigation outcome, you may escalate the concern directly to the Directors or Executive Leadership for a formal independent review.

6. External Disclosures & Prescribed Bodies

While internal procedures are designed to resolve issues effectively, workers have the legal right to contact prescribed external bodies, particularly where internal reporting is unsuitable or ineffective:

- **NSPCC Whistleblowing Advice Line** (Dedicated helpline for child protection and safeguarding concerns in education settings):
 - **Helpline:** 0800 028 0285
 - **Email:** help@nspcc.org.uk



- **Protect** (Independent UK Whistleblowing Charity):
 - **Helpline:** 0203 117 2520
 - **Email:** whistle@protect-advice.org.uk
 - **Website:** www.protect-advice.org.uk
- **Surrey Children's Single Point of Access (C-SPA) & Local Authority Designated Officer (LADO):**
For local safeguarding concerns or allegations against staff.
- **Ofsted / Department for Education (DfE) / Health and Safety Executive (HSE).**

7. Interaction with Safeguarding & Other Policies

This policy operates alongside and supports:

- **Roar Trails Safeguarding Children & Child Protection Policy 2026**
- **Roar Trails Code of Conduct Policy**
- **Low-Level Concerns and Allegations Against Staff Procedures**
- **Grievance and Disciplinary Policies**