Apollo After School Club

Whistleblowing Policy

Apollo After School Club is committed to the highest standards of openness, probity and accountability. If a member of staff discovers evidence of malpractice or wrongdoing within the Club they can disclose this information internally without fear of reprisal. Our **Whistleblowing** policy is intended to cover concerns such as:

- Financial malpractice or fraud
- Failure to comply with a legal obligation
- Dangers to health and safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Sexual harassment

This policy should not be used to question business decisions made by the Club, or to raise any matters that are covered under other policies (eg discrimination or racial harassment). Any allegations relating to child protection will follow the procedures set out in the **Safeguarding Children policy**. Any concerns relating to the employment conditions of an individual member of staff should be raised according to the procedures set out in the **Staff Grievance policy**. All staff will be made aware of these whistleblowing procedures as part of their safeguarding training and induction.

Sexual Harassment

Apollo After School Club recognises that sexual harassment is a serious matter and may constitute a qualifying disclosure under whistleblowing legislation where it is in the public interest to report it.

Sexual harassment will be explicitly treated as a concern that can be raised through this Whistleblowing Policy. This includes, but is not limited to, unwanted conduct of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

All staff, volunteers, and stakeholders are encouraged to report any concerns relating to sexual harassment through the whistleblowing reporting routes outlined in this policy. Reports can be made confidentially and will be taken seriously, investigated promptly, and handled sensitively.

Clear reporting routes are in place to ensure individuals feel safe and supported when raising concerns. These include reporting to a designated safeguarding lead, senior manager, or via any confidential reporting mechanisms available within the organisation.

Employers have a duty to take all reasonable steps to prevent harassment, including harassment by third parties such as clients, contractors, and service users. The organisation is committed to a proactive approach to compliance and will:

- maintain and regularly review robust anti-harassment policies;
- provide appropriate training to staff and volunteers;

- assess and mitigate risks, including those arising from third-party interactions.

Apollo After School Club is committed to protecting individuals who raise concerns in good faith from victimisation, retaliation, or detriment.

Raising a concern

Ideally the staff member should put his or her allegations in writing, setting out the background to the situation, giving names, dates and places where possible, and the reason why they are concerned about the situation.

In the first instance concerns should be taken to the Club's manager. If, due to the nature of the problem, this is not possible, concerns should be raised with the Club's management committee.

If this person or body is unwilling or unable to act on the concern, the staff member should then raise it with:

- Ofsted (if it concerns the safe and effective running of the club)
- The Local Authority Designated Officer or the Local Safeguarding Partnership (if it concerns a child protection issue and is not already covered by the procedure set out in the Club's **Safeguarding Children policy**)
- Ultimately, with the police (if a crime is thought to have been committed).

If the member of staff is still uncertain about how to proceed with the concern, he or she can contact the whistle-blowing charity Protect for advice.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other channels are open to them: • NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH. • Ofsted provides guidance on how to make complaints about a childcare provider: Complaints procedure - Ofsted - GOV.UK (www.gov.uk). • General guidance on whistleblowing can be found via: Whistleblowing for employees.

Responding to a concern

Initial enquiries will usually involve a meeting with the individual raising the concern, and will decide whether an investigation is appropriate and, if so, what form it should take. If a concern relates to issues which fall within the scope of other policies, it will be addressed under those policies.

If the initial meeting does not resolve the concern, further investigation is required. The appropriate person will investigate the concerns thoroughly, ensuring that a written response can be provided within ten working days where feasible, or if this is not possible, giving a date by which the final response can be expected. The response should include details of how the matter was investigated, conclusions drawn from the investigation, and who to contact if the member of staff is unhappy with the response and wishes to take the matter further.

Rights and responsibilities of the whistle-blower

All concerns will be treated in confidence and the Club will make every effort not to reveal the identity of anyone raising a concern in good faith. At the appropriate time, however, the member of staff may need to come forward as a witness.

If a member of staff raises a concern in good faith which is then not confirmed by the investigation, no action will be taken against that person.

If the investigation concludes that the member of staff maliciously fabricated the allegations, disciplinary action may be taken against that person.

Contact information

LADO (Local Authority Designated Officer): 01189372684
https://brighterfuturesforchildren.org/for-parents-carers/schools/allegations-against-people-in-a-position-of-trust/ (Reading)

LSP (Local Safeguarding Partnership): Covering west berks/reading and Wokingham
Now called-Berkshire West Safeguarding Children Partnership (BWSCP).
https://servicesguide.reading.gov.uk/kb5/reading/directory/service.page?id=cosJiaxLUXk&familychannel=3

Pan Berkshire Safeguarding Children's procedures
https://berks.trixonline.co.uk/

Police: 101 (non-emergency) or 999 (emergency)
Anti-terrorist hotline: 0800 789 321
NSPCC: 0808 800 500
Ofsted: 0300 123 1231
Protect (*formerly Public Concern at Work*): 020 3117 2520 (website: https://protect-advice.org.uk)

Related policies

Staff Grievance policy, Safeguarding Children policy.

This policy was updated and adopted by: **Apollo Youth Club**	Date: August 2026
To be reviewed: July 2027	Signed: Jackie Daniel, Chair

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2026): Safeguarding and Welfare requirements: Whistleblowing [3.7, 3.8]*