# Meadow Pathways Wellbeing and Education Cornwall (MPWEC)

# Whistleblowing Policy

# Education other than at School (EOTAS)

*Responsibility to update:* Zoe Waitz and Michelle Pascoe
*Applies to:* All staff, contractors, volunteers and visiting professionals working with children and young people (CYP) engaged in Meadow Pathways EOTAS packages (including tuition in homes, community venues and online).

Version No: 3
Date: September 2026
Review Date: September 2027

## Summary of Changes – September 2026 Review

This policy has been reviewed in September 2026 alongside Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children 2026. Key changes made at this review:

- Added an explicit link to KCSIE 2026 and to the Safeguarding and Child Protection Policy for safeguarding-specific concerns, including low-level concerns about a colleague's conduct.
- Clarified that a safeguarding concern about a colleague can be raised either through this policy or directly to the DSL, and does not need to wait for the whistleblowing process where a child's immediate safety is at risk.
- **Version 3 (September 2026):** roles updated to reflect Meadow Pathways' structure as a limited company led by two Directors (references to Trustees, a Chair of Trustees and a separate Whistleblowing Officer removed); external reporting routes added, including the LADO and the NSPCC Whistleblowing Advice Line; review period changed to annual.

This summary is provided for ease of reference; the changes are reflected throughout the policy below.

## Introduction

This policy sets out Meadow Pathways Wellbeing and Education Cornwall's approach to receiving, investigating, and resolving concerns about wrongdoing, malpractice, or failures that place children, staff, visitors, contractors, or the organisation at risk. It applies to all staff, volunteers, contractors, partner organisations, pupils, parents, and anyone working on or with Meadow Pathways, including EOTAS provision in homes, community venues, and online.

Meadow Pathways Wellbeing and Education Cornwall Ltd is led by two Founding Directors, Michelle Pascoe and Zoe Waitz. References to "the Directors" in this policy mean them.

## Principles

- Meadow Pathways encourages prompt reporting of genuine concerns about wrongdoing, malpractice, or danger to welfare, safeguarding, compliance, health and safety, or finances.
- Concerns will be handled seriously, investigated impartially, and addressed proportionately.
- Individuals who raise concerns in good faith will suffer no dismissal, victimisation, discrimination, or other detriment as a result of reporting.
- Deliberately false or malicious allegations will be treated as potential misconduct and may result in disciplinary action.
- Confidentiality will be respected wherever possible, consistent with the needs of a proportionate investigation and any legal or statutory obligations.
- This policy operates alongside our safeguarding, staff conduct, health and safety, complaints and data protection policies.

In line with Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children 2026, a safeguarding concern about a colleague – including a low-level concern that does not meet the threshold of an allegation of harm – should always be raised with the DSL

without delay, whether or not it is also reported through this Whistleblowing Policy. Where a child's immediate safety is at risk, staff must act immediately and not wait for the whistleblowing process to conclude.

## What to Report

Report suspicions or evidence of:

- Abuse, neglect, or safeguarding failures affecting children or adults.
- Criminal activity, including theft, fraud, bribery, or financial irregularity.
- Serious breaches of professional conduct, statutory guidance, or Meadow Pathways policies.
- Health and safety dangers or repeated unsafe practices.
- Unlawful discrimination, harassment, or victimisation.
- Deliberate concealment of any of the above.

## How to Raise a Concern

Raise concerns promptly and provide clear facts, dates, locations, names of those involved, and any supporting evidence. Concerns may be raised verbally, by phone, or in writing by email or post. Anonymous concerns will be considered but may limit the ability to investigate.

**Internal reporting route:**

- Raise your concern with either Founding Director: Michelle Pascoe (Michelle.Pascoe@meadowpathwayscornwall.com, 07563 862530) or Zoe Waitz (Zoe.Waitz@meadowpathwayscornwall.com, 07563 855070).
- If your concern is about one of the Directors, raise it with the other Director.
- If your concern is about both Directors, or you do not feel able to raise it internally, use one of the external routes below.

**External reporting routes:**

- **Concerns about an adult who works with children (allegations of harm):** Cornwall Local Authority Designated Officer (LADO) – 01872 326536, lado@cornwall.gov.uk.
- **Concerns about a child's safety:** Multi-Agency Support and Safeguarding Hub (MASSH) – 0300 123 1116 (out of hours 01208 251300). In an emergency, call 999.
- **NSPCC Whistleblowing Advice Line:** 0800 028 0285, help@nspcc.org.uk – for staff who feel unable to raise safeguarding concerns internally, or who feel their concerns are not being addressed.
- **Protect** (the independent whistleblowing charity) offers free, confidential advice on 020 3117 2520.
- Other concerns may be reported to the relevant regulator or prescribed body in line with the Public Interest Disclosure Act 1998.

## Investigation Procedure

- **Acknowledgement:** Receipt of the concern will be acknowledged within five working days.
- **Initial assessment:** The Director receiving the concern will assess whether it falls under this policy and whether immediate protective action is required. Any

safeguarding element is passed to the DSL (or, if the concern is about the DSL, to the Deputy DSL and the LADO) straight away.

- **Investigation:** A proportionate, independent and confidential investigation will be carried out. Where the concern involves a Director, the other Director will appoint an independent investigator who has no connection to the matter. Investigations will gather evidence, interview relevant parties, and review documents.
- **Updates:** The whistleblower will receive periodic updates on progress and a summary of the outcome where appropriate, consistent with confidentiality and legal constraints.
- **Outcomes:** Where wrongdoing is found, Meadow Pathways will take appropriate corrective action including disciplinary measures, changes to procedures, remedial work, or referral to external agencies. Where no wrongdoing is found but improvements are identified, recommendations will be implemented.
- **Records:** A secure record of the concern, investigation, findings, and actions will be kept by the Directors in line with Meadow Pathways' data retention schedule.

## Protection and Support

- **No retaliation:** Meadow Pathways prohibits retaliation against anyone who raises a genuine concern and will treat retaliation as a disciplinary matter.
- **Confidentiality:** The identity of the whistleblower will be protected where possible. The organisation may need to disclose identity to investigators, legal advisers, or statutory bodies if necessary and will inform the whistleblower before identifiable disclosure unless urgency or legal requirement prevents notification.
- **Support:** Meadow Pathways will offer support which may include welfare meetings, signposting to counselling, reasonable adjustments, or temporary changes to duties where appropriate.
- **False allegations:** Individuals making deliberately false or malicious allegations will be subject to disciplinary action.

## Roles and Responsibilities

- **Directors:** receive and log concerns, coordinate assessment and investigation, keep in contact with the whistleblower, appoint an independent investigator where a Director is involved, and take final decisions.
- **Investigators:** conduct impartial investigations, prepare written reports, and recommend actions.
- **All staff:** report concerns promptly, cooperate with investigations, and maintain confidentiality.

## Record Keeping and Review

- The Directors maintain a confidential log of concerns, actions and outcomes. Access to records is limited to authorised individuals.
- The Directors review whistleblowing concerns and trends annually to identify any wider issues and improvements.
- This policy is reviewed annually, or sooner after a serious incident or relevant statutory change.

## Communication

- A one-page whistleblowing guide summarising how to raise concerns, who to contact, and the protections available is shared with staff, volunteers, contractors, and visitors.
- Contact details for the Directors, the LADO and the NSPCC Whistleblowing Advice Line are kept up to date and communicated to all staff.

## Declaration

All staff, volunteers and contractors must read, understand, and act in accordance with this policy. Breaches will be taken seriously and may result in disciplinary action. Signed confirmation of receipt will be retained on individual personnel files.