

# 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).

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## 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, trustees, volunteers, contractors, partner organisations, pupils, parents, and anyone working on or with Meadow Pathways including EOTAS provision in homes, community venues, and online.

## 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 safeguarding, disciplinary, grievance, health and safety, complaints, data protection, and freedom of information policies.

## 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.
- Preferred internal reporting route in order:
  1. **Founding Director**, Meadow Pathways.  
Email: [Michelle.Pascoe@meadowpathwayscornwall.com](mailto:Michelle.Pascoe@meadowpathwayscornwall.com) ; Phone: 07932243358  
Email: [Zoe.Waitz@meadowpathwayscornwall.com](mailto:Zoe.Waitz@meadowpathwayscornwall.com) ; Phone: 07775733587
  2. If the concern is regarding either of the Founding Directors, inform the other Founding Director of the concern.
- 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.
- If internal reporting is inappropriate or does not provide a remedy, report to an external statutory body or regulator in accordance with legal guidance.

## Investigation Procedure

- Acknowledgement: Receipt of the concern will be acknowledged within five working days.
- Initial assessment: The Whistleblowing Officer will assess whether the concern falls under this policy and whether immediate protective action is required.
- Investigation: A proportionate, independent, and confidential investigation will be carried out by an impartial investigator appointed by the Whistleblowing Officer or Chair of Trustees. 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 retained by the Whistleblowing Officer 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:** 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, access to counselling, reasonable adjustments, temporary redeployment, or paid special leave where appropriate.
- **False allegations:** Individuals making deliberately false or malicious allegations will be subject to disciplinary action.

## Roles and Responsibilities

- **Whistleblowing Officer:** Receive and log concerns, coordinate assessment and investigation, maintain communication with the whistleblower, and refer serious matters to the Chair of Trustees.
- **Chair of Trustees:** Provide oversight, appoint independent investigators where required, and take final decisions about matters involving senior staff or trustees.
- **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 Whistleblowing Officer will maintain a confidential log of concerns, actions and outcomes. Access to records will be limited to authorised individuals.
- Trustees will review whistleblowing reports and trends annually to identify systemic issues and governance improvements.
- This policy will be reviewed every two years or sooner after a serious incident, relevant statutory change, or at the direction of Trustees.

## Communication

- A concise one-page whistleblowing guide summarising how to raise concerns, who to contact, and protections will be published for staff, volunteers, contractors, and visitors.
- Contact details for the Whistleblowing Officer and Chair of Trustees will be maintained and communicated to all staff.

## Declaration

All staff, volunteers, contractors, and trustees 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.

