NEO — Whistleblowing (How to Raise a Concern)

14 Oct 2026, 5 min read

Date	14 October 2026
Review Date	December 2026, then annually, or sooner if practice or legislation changes
Owner	Director of Operations (Nudge Education Ltd) and HR, with the Director, NEO & Head of School; the Designated Safeguarding Lead (NEO) is involved at the point of any allegation and any referral to the LADO
Approved by	Approved by the Director, NEO & Head of School on 14 October 2026 under authority delegated by the Proprietor (CEO of Nudge Education Ltd) on 13 October 2026; for noting at the NEO board on 3 December 2026
Version	v10.26

A fully online alternative provision for learners aged 11–18

1. One policy, with NEO routes

The Nudge Education **Whistleblowing Policy** (December 2025) is NEO's whistleblowing policy. It applies in full to everyone working for or with NEO: employed staff, Qualified Educators in the talent pool, Practitioner-Mentors, contractors, volunteers and board members. This page does not replace it. It sets out the NEO-specific routes and the protections that matter in an online provision, so that a person who sees something wrong knows where to go and that they will be protected when they do. It is published because the DfE's online education standards (4.1) and Keeping Children Safe in Education 2026 expect staff to be able to raise concerns about poor or unsafe practice and to know that they can.

2. What to raise

Anything you reasonably believe shows wrongdoing or risk, including: a safeguarding failure or a concern that the safeguarding process is not being followed; a breach of the online safety, data protection or AI policies, including an AI tool used with learners without review; a criminal offence, a breach of a legal obligation, or a miscarriage of justice; danger to the health or safety of a learner or colleague; a cover-up of any of these. Concerns about your own employment are grievances, not whistleblowing, and follow the HR policies.

3. Where to raise it at NEO

- **Safeguarding concerns about a learner** go to the Designated Safeguarding Lead immediately, under the **Child Protection and Safeguarding Policy**, not under this policy.
- **Low-level concerns or allegations about an adult** go to the Head of School under the **Managing Allegations Against Staff Policy**. Concerns about the Head of School go to the Proprietor (CEO).
- **Other whistleblowing concerns** go first to the Head of School; if the concern involves the Head of School, or you are not comfortable raising it there, to the Director of Operations or the CEO as Proprietor; if it involves the Proprietor, to the chair of the NEO board or an external route below.
- **Externally**: the NSPCC whistleblowing advice line for professionals (0800 028 0285), the local authority designated officer (LADO) for concerns about adults working with children, the Department for Education for concerns about an online education provider, the Information Commissioner for data protection, the Charity Commission where relevant, or Protect (the whistleblowing charity) for confidential advice. The Nudge policy lists the prescribed persons under the Public Interest Disclosure Act 1998.

Concerns may be raised by email, in a call or in writing; a confidential route that does not pass through the person concerned is always available. Nothing in NEO's systems is monitored in a way that would identify a whistleblower: Smoothwall Monitor is deployed to learner devices and learner accounts, not to staff accounts, and staff communications are not read for this purpose.

4. Protection

A person who raises a concern in good faith is protected under the Public Interest Disclosure Act 1998 and will not be disadvantaged, dismissed or treated unfavourably for doing so, whether or not the concern is upheld. Victimisation of a whistleblower is a disciplinary matter. NEO keeps the identity of the person confidential as far as the law allows and tells them if it cannot.

5. What happens next

The person receiving the concern acknowledges it within two working days, decides whether an investigation is needed and by whom, and tells the whistleblower what will happen and, within the limits of confidentiality, the outcome. Safeguarding concerns follow safeguarding timescales. Where a concern is, or contains, an allegation about an adult who works with children, the Designated Safeguarding Lead (NEO) is told at once and decides whether the local authority designated officer (LADO) threshold is met and makes any referral; if the matter is conduct only and stays internal, it is handled by Nudge Education HR under the Disciplinary and Investigation Policy, and the DSL is told the outcome in case anything in the investigation becomes reportable. The DSL does not conduct the investigation. The Head of School reports the number and nature of whistleblowing concerns to the NEO board termly, without names.

6. Related documents

- **Whistleblowing Policy** (Nudge Education)
- **Managing Allegations Against Staff Policy**
- **Child Protection and Safeguarding Policy**
- **NEO — Governor Code of Conduct**
- *Keeping Children Safe in Education 2026*, Part one (whistleblowing) and Part four