

WHISTLEBLOWING POLICY

Compass Learning & Education

September 2026



DOCUMENT CONTROL

Policy Owner: Director – Rosie Aylward

Designated Safeguarding Lead (DSL): Rosie Aylward

Review Cycle: Annual

Next Review Date: 1st September 2027

Approved By: Director

1. Purpose

Compass Learning & Skills Centre is committed to the highest standards of openness, probity and accountability.

This policy sets out how staff and other workers can raise concerns about wrongdoing or malpractice within the Provision safely and without fear of retaliation.

The Provision recognises that early reporting of concerns protects:

- Children and young people
- Staff
- The integrity of the Provision
- Public confidence

2. Legal Framework

This policy operates in accordance with:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Children Act 1989
- Education Act 2002
- Keeping Children Safe in Education
- Counter-Terrorism and Security Act 2015
- Equality Act 2010
- Health and Safety at Work etc. Act 1974

Under the Public Interest Disclosure Act 1998 (PIDA), workers are legally protected from dismissal or detriment when making a “protected disclosure” in the public interest.

3. Scope

This policy applies to:

- Employees
- Agency workers
- Volunteers
- Contractors
- Consultants
- Governors (if applicable)

It does not replace safeguarding reporting procedures but sits alongside them.

4. What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing that is in the public interest.

This may include (but is not limited to):

- Safeguarding failures or deliberate concealment of abuse
- Criminal offences
- Miscarriages of justice
- Breaches of legal obligations
- Radicalisation concerns not acted upon
- Health and safety dangers
- Financial misconduct or fraud
- Corruption or bribery
- Deliberate data protection breaches
- Discrimination or systemic malpractice
- Cover-ups of any of the above

Whistleblowing is different from:

- A personal grievance (which should follow the Grievance Policy)
- Disciplinary matters
- Routine safeguarding referrals (which must follow the Safeguarding Policy immediately)

5. Safeguarding Concerns

Where a whistleblowing concern relates to safeguarding:

- Staff must follow the Safeguarding and Child Protection Policy immediately.
- If the concern relates to the DSL or Head of Provision, the matter must be reported to the Local Authority Designated Officer (LADO) without delay.
- In cases of immediate risk, staff must contact children's social care or the police directly.

KCSIE makes clear that staff must feel able to raise concerns about poor or unsafe safeguarding practice and that such concerns must be taken seriously.

6. Protection for Whistleblowers

The Provision will:

- Treat all disclosures seriously.
- Not tolerate harassment, victimisation or retaliation.
- Maintain confidentiality as far as reasonably possible.
- Ensure no worker suffers detriment for raising genuine concerns.

Any attempt to intimidate or retaliate against a whistleblower may constitute gross misconduct.

However, malicious or knowingly false allegations may result in disciplinary action.

7. How to Raise a Concern

Stage 1 – Internal Reporting

Concerns should normally be raised with:

- The Head of Provision / Director

If the concern relates to the Head of Provision, staff should report directly to:

- The Local Authority Designated Officer (LADO)
- Ofsted
- The Local Authority Safeguarding Team

Reports should include:

- Nature of the concern
- Relevant dates, times and locations
- Names of individuals involved (if known)
- Any supporting evidence

Concerns may be raised verbally or in writing.

Stage 2 – External Reporting

If:

- The concern has not been addressed appropriately, or
- The whistleblower believes internal reporting would be inappropriate,

Concerns may be raised externally with:

- The Local Authority
- Ofsted [Sharing concerns and information with Ofsted about children's social care services - GOV.UK](#)
- The NSPCC Whistleblowing Helpline [Whistleblowing Advice Line | NSPCC](#)
- The Health and Safety Executive (HSE)
- The Information Commissioner's Office (ICO) [Information Commissioner's Office](#)

- The Police [Home | Greater Manchester Police](#)

Details of Manchester City Council's LADO can be found below:

ladoreferrals@tameside.gov.uk

[Phone: 0161 342 4343](tel:01613424343)

Details of Stockport Council's LADO can be found below:

[Contact the LADO - Stockport Council](#)

[0161 474 5657](tel:01614745657).

Disclosures to prescribed bodies remain protected under PIDA.

8. Investigation Procedure

Upon receiving a disclosure:

1. The Head of Provision (or appropriate authority) will acknowledge receipt.
2. A preliminary assessment will determine next steps.
3. An investigation may be conducted internally or referred externally.
4. The whistleblower will be informed (where appropriate) that the matter has been addressed.

Certain matters (e.g. safeguarding allegations against staff) must be referred to the LADO before any internal investigation.

9. Confidentiality and Anonymity

Whistleblowers are encouraged to provide their name to allow effective investigation.

Anonymous disclosures will be considered but may be more difficult to investigate.

The Provision will:

- Protect identity where possible
- Share information only on a need-to-know basis

10. Record Keeping

A confidential and secure record of all whistleblowing disclosures will be maintained by the Head of Provision / Proprietor.

The record will include:

- Date the concern was received
- Name of the whistleblower (unless anonymous)
- Nature and details of the concern raised
- Any immediate safeguarding or risk mitigation action taken

- Whether the matter was referred to an external agency (e.g. LADO, Local Authority, Police, Ofsted, HSE, ICO)
- Investigation steps undertaken
- Outcome and any actions implemented
- Date the matter was concluded

Records will:

- Be stored securely with restricted access on a need-to-know basis
- Be kept separate from routine personnel files where appropriate
- Be retained in accordance with the Provision's Data Retention Schedule and the Data Protection Act 2018 / UK GDPR
- Be made available for inspection by regulatory bodies where lawfully required

Confidentiality will be maintained as far as reasonably possible; however, information may need to be shared with appropriate authorities where safeguarding, legal or regulatory obligations apply.

Failure to maintain appropriate records may constitute a breach of statutory safeguarding and governance duties.

11. The Head of Provision is responsible for:

- Promoting a culture of openness, transparency and accountability in which staff feel safe to raise concerns.
- Ensuring this policy is implemented effectively and reviewed annually.
- Ensuring compliance with statutory guidance, including safeguarding legislation and the Public Interest Disclosure Act 1998.
- Receiving and recording whistleblowing disclosures promptly and confidentially.
- Assessing concerns objectively and determining whether referral to external agencies (e.g. LADO, Local Authority, Ofsted, Police, HSE, ICO) is required.
- Ensuring safeguarding allegations are referred to the Local Authority Designated Officer (LADO) before any internal investigation takes place, where required.
- Taking appropriate action following investigation, including implementing corrective measures.
- Ensuring no detriment, retaliation or victimisation occurs as a result of a protected disclosure.
- Maintaining secure and confidential records of all whistleblowing concerns.

12. All staff have a professional and ethical duty to:

- Raise concerns promptly where they believe wrongdoing, malpractice or unsafe practice has occurred or may occur.
- Act in the public interest and prioritise the welfare and safety of children and young people.
- Follow the reporting procedures outlined in this policy.
- Provide factual information and co-operate fully with any investigation.

- Maintain confidentiality and not discuss whistleblowing matters outside appropriate professional channels.

Failure to raise known concerns relating to safeguarding or serious misconduct may itself constitute a breach of professional duty.

12. Malicious Allegations

The Provision recognises the importance of protecting individuals from knowingly false or malicious allegations.

Where it is determined, following investigation, that an allegation was made deliberately, maliciously, or with intent to cause harm, this may result in disciplinary action in accordance with the Provision's Disciplinary Policy and may constitute gross misconduct.

However, no action will be taken against a whistleblower who raises a concern in good faith, even if the concern is not subsequently substantiated. The key consideration is whether the disclosure was made honestly and in the public interest.

The Provision will ensure that this section is not used to deter or discourage genuine whistleblowing concerns.

13. Monitoring and Review

This policy will be reviewed annually or sooner if statutory guidance changes.

14. Declaration

All staff must confirm they have:

- Read and understood this policy
- Understood their duty to raise concerns
- Signed the declaration on induction and annually thereafter

Signed: _____

Date: _____