



New Way Tuition LTD

Whistleblowing Policy

This policy should be read alongside:

- Child Protection and Safeguarding Policy
 - Low-Level Concerns Procedure
 - Allegations Against Staff Policy
 - Staff Code of Conduct
 - Grievance Policy
 - Complaints Policy
 - Disciplinary Policy
 - Data Protection Policy

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Managing Director: Mandy Ward

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Purpose of the Policy

New Way Tuition is committed to maintaining a culture of openness, integrity, and accountability. This policy encourages employees, tutors, students, and other stakeholders to report concerns regarding any suspected wrongdoing or unethical practices without fear of retaliation.

Scope

This policy applies to all employees, tutors, students, contractors, and volunteers. It is intended to address concerns about actions that may:

- Violate the law
- Pose a risk to health and safety
- Compromise the educational integrity of New Way Tuition
- Involve financial malpractice
- Breach New Way Tuition's policies and ethical guidelines

Concerns should be raised in the public interest, meaning they must affect others—such as students, staff, or the public—not solely individual grievances.

Definition of Whistleblowing

Whistleblowing is the act of reporting information that a person reasonably believes shows:

- **Illegal Activity:** Such as fraud, theft, or corruption.
- **Health & Safety Risks:** Endangering the safety of students, staff, or the public.
- **Academic Misconduct:** Cheating, falsification of records, or misrepresentation.
- **Mismanagement of Resources:** Misuse of company funds, resources, or assets.
- **Unethical Practices:** Harassment, discrimination, or any act contrary to the values of New Way Tuition.

Safeguarding:

Where a concern involves risk to a child, staff must inform the DSL immediately. Allegations about staff are managed under the Allegations Against Staff Policy and may be referred to the LADO.

Choosing the Correct Reporting Route

CHOOSING THE CORRECT REPORTING ROUTE

CONCERN	EXAMPLES	REPORT USING
 A concern about your own employment, workload or treatment	• Workload or working practices • Bullying or harassment directed towards you • Disputes with colleagues or managers • Terms and conditions of employment	 Grievance Policy
 Serious wrongdoing affecting others or the organisation	• Safeguarding concerns not being acted upon • Serious breaches of policy, law or regulations • Fraud, corruption or financial misconduct • Actions placing children, young people or staff at risk	 Whistleblowing Policy
 Behaviour by an adult that is inappropriate but does not meet the harm threshold	• Boundary issues with a child or young person • Inappropriate language or comments • Favouritism towards a learner • Unprofessional use of social media or personal devices • Behaviour that causes professional concern but does not meet the harm threshold	 Low-Level Concerns Procedure
 Allegation against a member of staff that meets the harm threshold	• Behaviour that has harmed or may have harmed a child • Possible criminal offence against a child • Behaviour that indicates they may pose a risk to children	 Allegations Against Staff Policy
 Immediate safeguarding concern	• Disclosure of abuse • Immediate risk of significant harm • Serious safeguarding concern requiring urgent action	 Child Protection & Safeguarding Policy (DSL immediately)

If unsure, staff should seek advice from the Designated Safeguarding Lead or Managing Director before making a report.

Reporting Procedure

New Way Tuition encourages individuals to raise concerns internally first. Concerns can be reported through the following channels:

Direct to the Whistleblowing Officer: Mandy Ward (Managing Director). If the concern involves senior management, a designated individual will be assigned.

- Email: mandy@newwaytuition.co.uk
- Phone: 07985 686 992
- In-person meetings (by appointment)
- Anonymous reporting (allowed, though named reports help with follow-up)

Anonymous Reporting: Reports can be made anonymously if preferred. However, providing contact information allows for follow-up and clarification, which can aid in the investigation process.

Safeguarding Concerns

Where a whistleblowing concern involves the safety or welfare of a child, staff must immediately inform the Designated Safeguarding Lead (DSL) and follow the Child Protection and Safeguarding Policy. Whistleblowing procedures must never delay action to protect a child.

If a concern cannot reasonably be raised internally, disclosures may be made to an appropriate prescribed person/regulator (for example, Ofsted where applicable, the ESFA for funding/education

concerns, the ICO for data protection, or the HSE for health and safety), in line with public-interest and reasonable-belief tests. Concerns relating solely to an individual's own employment, contractual arrangements or personal treatment should normally be addressed through the Grievance Policy unless they also involve wider wrongdoing affecting others or the organisation.

Protection for Whistleblowers

New Way Tuition is committed to ensuring that no whistleblower faces retaliation, such as dismissal, harassment, or unfavourable treatment, because of raising a concern in good faith.

- **Confidentiality:** All reports are treated with strict confidentiality. Information will only be shared as needed for investigation purposes and with relevant personnel.
- **No Reprisals:** Individuals who raise genuine concerns will not suffer any form of penalty, regardless of the outcome of the investigation.

Reports made maliciously or in bad faith may be investigated and could result in disciplinary action.

Nothing in any contract, policy, settlement agreement or NDA prevents or restricts anyone from making a protected disclosure under the Public Interest Disclosure Act 1998.

Investigation Process

- **Initial Assessment:** The Managing Director will review the concern to determine its validity and identify the appropriate course of action. If the concern is about the Director Mandy Ward, the Business Manager Rebecca Lain should be informed.
- **Assignment of Investigation Team:** An objective team will be assigned to handle the investigation, ensuring impartiality and thoroughness.
- **Timeline:** Every effort will be made to conclude the investigation within 30 days, depending on the nature and complexity of the concern. Progress updates will be provided to the whistleblower if possible.
- **Outcome:** If the investigation confirms wrongdoing, corrective actions will be implemented. Disciplinary actions, policy changes, or notifications to external authorities may follow as necessary.
- Investigation documentation will be securely stored in line with GDPR and company retention policies. Access will be restricted to authorised personnel only.

Record Keeping

- All whistleblowing reports, investigations, decisions and outcomes will be securely recorded and retained in accordance with the Data Protection Act 2018, UK GDPR and New Way Tuition's Data Protection Policy.
- Records will be reviewed periodically to identify trends, improve organisational learning and strengthen safeguarding arrangements.

Feedback to the Whistleblower

- **Acknowledgment:** Receipt of the concern will be acknowledged within 48 hours.
- **Follow-Up and Updates:** Where possible, the whistleblower will receive updates on the investigation's progress and any actions taken, respecting confidentiality requirements.

Training and Awareness

- **Staff Training:** All staff and tutors will receive regular training on the whistleblowing policy, encouraging openness and educating them on the process.
- **Student and Stakeholder Awareness:** Informational sessions will be available to students, contractors, and other stakeholders to ensure they understand their rights and the reporting procedure.
- All new staff, tutors, and volunteers will be introduced to this policy during induction and asked to confirm their understanding.

Legislation

Public Interest Disclosure Act 1998 (PIDA)

This key legislation provides legal protection for whistleblowers and applies to all organizations, including educational settings like alternative provisions. The policy's focus on protecting whistleblowers from retaliation and ensuring confidentiality aligns directly with PIDA.

Education Act 2002 (Section 175 for Local Authorities/Section 157 for Independent Schools)

Alternative provisions must ensure arrangements are in place to safeguard and promote the welfare of children. This policy reflects this by allowing whistleblowing on health and safety risks, academic misconduct, and safeguarding concerns.

Employment Rights Act 1996

The Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, provides legal protection for workers who make protected disclosures in the public interest. New Way Tuition will ensure that no individual suffers detriment or unfair treatment as a result of raising a genuine concern in accordance with this policy.

Children Act 1989 and 2004 (Safeguarding Focus)

Reporting safeguarding concerns, such as abuse or neglect, is central to these acts. The policy's commitment to protecting students' safety reflects this legal duty.

Health and Safety at Work etc. Act 1974

The inclusion of health and safety risks as reportable concerns ensures compliance with this Act, which places a legal obligation on schools and alternative provisions to maintain a safe environment for students, staff, and visitors.

Equality Act 2010

By addressing issues such as harassment, discrimination, and unethical practices, the policy aligns with the Equality Act, which requires schools to eliminate discrimination and promote equality among staff and students.

Data Protection Act 2018 (GDPR)

Confidentiality and proper handling of whistleblower data comply with GDPR, ensuring personal information is securely managed and only shared when legally necessary.

Guidelines and Best Practices

Keeping Children Safe in Education (KCSIE) 2026

This statutory guidance for schools and alternative provisions emphasises the importance of a robust whistleblowing policy to address safeguarding concerns. The policy supports KCSIE by encouraging staff and stakeholders to report any risks to children's safety without fear of reprisal.

Working Together to Safeguard Children (2023)

This inter-agency statutory guidance stresses the responsibility of organizations, including alternative provisions, to act in children's best interests. The policy aligns by promoting the reporting of safeguarding and welfare concerns.

Ofsted Framework for Inspecting Alternative Provisions

Ofsted requires alternative provisions to demonstrate effective governance, safeguarding, and accountability. A whistleblowing policy like this supports the framework by ensuring transparency and ethical oversight.

ACAS Code of Practice on Whistleblowing

The policy reflects best practices outlined by ACAS, including the provision of clear reporting channels, protections from retaliation, and an open culture for raising concerns.

Whistleblowing Guidance for Employers and Code of Practice (UK Government/BEIS)

This policy complies with BEIS guidance on whistleblowing by ensuring thorough training, ongoing monitoring, and accessible reporting systems.

NSPCC Whistleblowing Guidance

The inclusion of the NSPCC Whistleblowing Advice Line ensures alignment with national safeguarding support services, which are particularly relevant for education providers.

Key Alignment Features for Alternative Provisions

Safeguarding Focus

The policy's provisions for reporting concerns that pose risks to students' health and safety reflect statutory safeguarding duties under the Children Act and KCSIE.

Transparency in Governance

Emphasis on financial malpractice and academic misconduct aligns with the accountability required by Ofsted and the Education Act 2002.

Protected Reporting Channels

Anonymous reporting and protections from retaliation ensure compliance with PIDA and best practices under ACAS and BEIS codes.

Specific Educational Context

The policy addresses concerns unique to education, such as academic misconduct, safeguarding breaches, and health and safety risks, which are critical in alternative provision settings.

Training and Awareness

Staff and stakeholder training ensures compliance with safeguarding guidance (KCSIE and Working Together to Safeguard Children) and fosters a culture of openness.

Learning from Whistleblowing Concerns

New Way Tuition values whistleblowing as an important part of maintaining a safe, transparent and accountable organisation.

Lessons learned from whistleblowing investigations will be used to:

- improve policies;
- strengthen safeguarding;
- identify training needs;
- improve governance;
- reduce future risks.

Monitoring and Review

- This policy will be reviewed annually or sooner following changes to legislation, statutory guidance or organisational practice.
- The Managing Director will monitor whistleblowing concerns, outcomes and themes to ensure lessons are learned, safeguarding remains effective and staff continue to feel confident in raising concerns.

Continuous Improvement

New Way Tuition is committed to continually improving its whistleblowing arrangements through:

- annual policy review;
- regular governance review;
- analysis of whistleblowing trends;
- staff feedback;
- safeguarding audits;

- updates following changes to legislation or statutory guidance.

Additional Support

Individuals seeking further guidance may consult external advisory services or seek independent legal advice if they are unsure about reporting a concern.

Staff may also seek confidential advice from their professional association, trade union or an independent legal adviser before making a protected disclosure.

External advice and support are available from:

- Whistleblowing Helpline: 08000 724725 | enquiries@wbhelpline.org.uk
- NSPCC Whistleblowing Advice Line: 0800 028 0285 | help@nspcc.org.uk

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