

Tubers Academy

Whistleblowing Policy

Version	2.0
Owner	Head of Operations
Review Cycle	Annually
Approval	Managing Director
Date	May 2026

1. Introduction

Tubers Academy is committed to the provision of education with honesty and integrity and expects all staff to maintain high standards. Any suspected wrongdoing should be reported to the appropriate person as soon as is reasonably practicable.

This policy provides a confidential route for all staff to raise genuine concerns about practice, conduct or safeguarding. It applies to all employees, contractors and agency workers working within Tubers Academy.

2. What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes, but is not limited to:

- Bribery, fraud or other criminal activity
- Unauthorised use of public funds
- Miscarriages of justice
- Health and safety risks
- Damage to the environment
- Any breach of legal or professional obligations
- Safeguarding concerns relating to children or young people
- Modern slavery and human trafficking

3. Confidentiality

We hope that all staff will feel able to voice whistleblowing concerns openly under this policy. All concerns will be treated in confidence. Completely anonymous disclosures can be difficult to investigate, but if you wish to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

4. How to Raise a Concern

We will listen to and take all concerns seriously. We will arrange a meeting with you as soon as possible to discuss your concern. In many cases you will be able to raise concerns with your line manager. However, if you would prefer not to raise it with your line manager for any reason, follow the staged procedure below.

Stage 1 - Line Manager

In the first instance, unless you reasonably believe your line manager to be involved in the wrongdoing, you should approach them directly. Any concerns about the line manager should be raised with the Regional Manager.

If you believe the Regional Manager to be involved in the wrongdoing, or for any reason do not wish to approach your line manager, proceed directly to Stage 3.

Stage 2 - Regional Manager Investigation

The Regional Manager will immediately investigate the allegation, either directly or by passing the matter to the Head of Operations. The investigation may require the member of staff and other individuals involved to provide a written statement.

Any investigation will be carried out in accordance with the principles set out in this policy. The member of staff's statement will be taken into account and they will be asked to comment on any additional evidence obtained.

The Regional Manager will report to the Head of Operations, who will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the matter will be referred to HR and the disciplinary procedure commenced.

At the conclusion of the investigation, the member of staff will be told the outcome and what Tubers Academy has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

Stage 3 - Head of Operations / Managing Director

If you are concerned that the Regional Manager is involved in wrongdoing, or has failed to make a proper investigation, you should inform the Head of Operations, who will investigate.

If the concern relates to the Head of Operations, the Managing Director must be informed and will carry out their own investigation.

Stage 4 - External Referral

If, on conclusion of Stages 1, 2 and 3, you reasonably believe that appropriate action has not been taken, you should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made, including:

- Local Authority Designated Officer (LADO)
- Department for Education (DfE)
- Police
- Social Services / Children's Services
- Ofsted
- Relevant professional bodies and/or regulatory organisations
- Local Authority

5. LADO — Local Authority Designated Officer

What is LADO?

Every local authority has a statutory responsibility to have a Local Authority Designated Officer (LADO) who is responsible for coordinating the response to concerns that an adult who works with children may have caused them harm or could cause them harm. The LADO works within Children's Services and gives advice and guidance to employers, organisations and other individuals who have concerns about the behaviour of an adult who works with children and young people.

What is LADO's role?

- To coordinate the safeguarding and investigative process in response to allegations made against people working with children
- To provide advice and guidance to employers and voluntary organisations
- To liaise with police and other agencies including Ofsted and professional bodies such as the General Medical Council and the Teaching Regulatory Agency
- To monitor the progress of referrals to ensure they are dealt with as quickly as possible, consistent with a thorough and fair process
- To resolve any inter-agency issues
- To collect strategic data and maintain a confidential database in relation to allegations
- To disseminate learning from LADO enquiries through the children's workforce
- To ensure that measures are in place to prevent further harm or abuse and that, where required, referrals are made to the appropriate social care team

What should be referred to LADO?

The LADO should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

Allegations of historical abuse should be responded to in the same way as contemporary concerns. In such cases it is important to find out whether the person against whom the allegation is made is still working with children and, if so, to inform their current employer or voluntary organisation, or refer the family for assessment.

Referral timescale

Any concern that meets the criteria above must be referred to the LADO within one working day of the concern coming to your attention.

LADO Contact Details

Devon County Council (DCC)

Phone (office hours): 01392 384964

Email: childsc.localauthoritydesignatedofficersecure-mailbox@devon.gov.uk

Out of hours: 0345 6000 388

Torbay

Phone: 01803 208541

Safeguarding and Reviewing Service (SARS): SARS@torbay.gov.uk

Phone: 01803 208564

Emergency - Child in Immediate Danger

Call 999 immediately, then inform the DSL without delay.

National DSL: Rebecca Jones, Head of Operations

DDSL Southwest: Stevie Kilbride, Executive Assistant

DDSL Yorkshire: Amy Rooney, Provision Coordinator

Centre Safeguarding Officers: Each Centre Manager

6. Modern Slavery and Human Trafficking

Tubers Academy is committed to combating modern slavery and human trafficking in all forms. We encourage and support all staff to share any concerns or suspicions they may have about instances of modern slavery or human trafficking through the procedures set out in this policy. Any disclosure made in good faith will be treated confidentially and there will be no retaliation against those who speak up.

Reporting Modern Slavery

If you suspect modern slavery or human trafficking, report it to the Modern Slavery Helpline: 08000 121 700

Or contact the police on 101.

In an emergency, always call 999.

7. Protection and Support for Whistleblowers

Tubers Academy aims to encourage openness and will support whistleblowers who raise genuine concerns, even if they turn out to be mistaken. Whistleblowers must not be subjected to any detrimental treatment as a result of raising a genuine concern.

However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

8. Support for Employees Subject to Allegations

Tubers Academy has a duty of care to all employees. Where a member of staff is subject to an allegation, Tubers Academy will:

- Provide effective support and appoint a named contact for anyone facing an allegation
- Give priority to resolving the matter as soon as possible, usually within one month
- Not automatically suspend the member of staff — alternatives such as assignment to alternative work will be considered
- Ensure the reason for any suspension is communicated to the person in writing within one working day
- Ensure that allegations found to be unfounded or malicious are removed from personnel records
- Apply appropriate sanctions where children are found to have made malicious allegations

After consulting the Head of Operations, the accused person will be told about the allegation. The level of detail provided will be agreed beforehand and will range from the minimum (where a Strategy Meeting is to be held) to the greatest level of detail following a No Further Action decision. The person will be informed of the likely courses of action.

Confidentiality must be maintained throughout. No information should be offered to the media nor should any details be published that would identify any person under investigation, unless or until that person has been charged with an offence.

Initial Discussion - Possible Outcomes

- Strategy Meeting - normally held within three working days
- Referral to Social Care
- Referral to Police for investigation
- No Further Action (NFA) - Tubers Academy then determines how to proceed, which may include internal disciplinary action. Informal action should be resolved within a timely fashion and most cases concluded within one month

9. Outcome of Allegations

The outcome of all allegation investigations must be identified as one of the following. All outcomes must be recorded clearly and comprehensively, including a summary of the allegation, how it was followed up and resolved, any action taken, and decisions reached.

Records must be kept in the confidential personnel file of the accused, with a copy provided to the person concerned. Records must be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation, whichever is longer.

Outcome	Definition	Action / Recording
Substantiated	There is sufficient evidence to prove the allegation.	Discussion with HR and/or other professionals about a

		referral to DBS and/or a Disciplinary Hearing.
False	There is sufficient evidence to disprove the allegation.	Information must not be included in any reference. Remove from personnel records.
Unsubstantiated	There is insufficient evidence to prove or disprove the allegation. This does not imply guilt or innocence.	Information must not be included in any reference.
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.	Details of malicious allegations must be removed from personnel records.
Unfounded	There is no evidence or proper basis supporting the allegation. The person making it may have misinterpreted the incident, been mistaken, or not been aware of all circumstances.	After liaison with HR/legal advisors. No inclusion in references.

10. Review History

Name and Position	Reviewed Date and Updates
Annie Callan AP Engagement Manager / Safeguarding Lead UK	May 2024 - Reviewed and updated
Sarah Sullivan Operations Manager & Deputy Safeguarding Lead UK	
Annie Callan AP Engagement Manager / Safeguarding Lead UK	May 2025 - Reviewed and updated
Sarah Sullivan Operations Manager & Deputy Safeguarding Lead UK	
Rebecca Jones Head of Operations / National DSL	May 2026 - Reviewed and updated. Reformatted to current Tubers Academy policy template. Updated escalation contacts and DSL structure throughout, updated DCC LADO email.

11. Document Information

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