



LIGHTHOUSE

LEARNING PROVISION

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— PRACTICAL LEARNING. EMOTIONAL GROWTH. PREPARATION FOR ADULthood. —

OPERATIONAL AND PUBLIC POLICY

Whistleblowing Policy and Procedure

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Organisation	Lighthouse Learning Provision Ltd
Policy owner	Board of Directors
Whistleblowing Lead	Adam Waldron - Director
Alternative Whistleblowing Contact	Rachel Waldron - Director
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Speak up promptly. No child, worker or member of the public should remain at risk because a concern feels difficult, sensitive or inconvenient to raise.

Policy at a glance

Lighthouse encourages adults to raise genuine concerns about wrongdoing, danger, safeguarding failures or serious malpractice. Concerns will be assessed promptly, handled fairly and confidentially as far as possible, and no person will be subjected to retaliation for speaking up in the public interest.

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1. Purpose and aims

1.1 This policy explains how Lighthouse Learning Provision Ltd enables people working with or for the organisation to raise concerns about wrongdoing, danger or serious malpractice in the public interest.

1.2 Lighthouse aims to:

- create a culture in which speaking up is expected, safe and valued;
- identify risks to children, workers, commissioners, the public and the organisation at the earliest opportunity;
- provide clear internal and external reporting routes, including routes where a Director is involved;
- assess immediate safeguarding, health and safety, financial, legal and evidence-preservation needs;
- investigate concerns independently and proportionately or refer them to the appropriate authority;
- protect people who raise genuine concerns from retaliation, victimisation or disadvantage;
- give appropriate feedback while respecting confidentiality and the rights of others; and
- use findings and themes to improve governance, practice and organisational culture.

1.3 This policy is not designed to discourage lawful external disclosure or to require a person to resolve an emergency internally before contacting statutory services.

2. Scope, status and legal framework

2.1 Lighthouse is an independent non-school alternative provision provider. The Board of Directors is responsible for ensuring that concerns about its services, governance and workforce can be raised and considered safely.

2.2 The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to protect qualifying workers who make protected disclosures. A disclosure must meet statutory conditions before legal protection applies. This policy provides broader organisational routes and safeguards, but it cannot determine whether a particular disclosure is legally protected; that is ultimately a matter for a court or employment tribunal.

2.3 The policy reflects the Employment Rights Act 1996, including the addition of sexual harassment as a category of qualifying wrongdoing from 6 April 2026, the Equality Act 2010, Data Protection Act 2018 and UK GDPR, Working Together to Safeguard Children 2026, current whistleblowing guidance and relevant safeguarding, health and safety and commissioning requirements.

2.4 No confidentiality clause, non-disclosure agreement or contractual term will be interpreted or used to prevent a lawful protected disclosure, a safeguarding referral, a report to police or another disclosure permitted by law.

3. What whistleblowing means

3.1 Whistleblowing is the disclosure of information about wrongdoing or danger that the person reasonably believes is in the public interest. The concern will normally affect, or have the potential to affect, other people rather than being solely a private employment dispute.

3.2 A person does not need complete proof and may be mistaken, provided they reasonably believe that the information tends to show wrongdoing and that raising it is in the public interest. The person should share facts, observations and documents available to them, rather than investigate the matter personally.

3.3 A protected disclosure is a legal term. To receive statutory protection, the person, subject matter, belief, public-interest element and recipient must satisfy the requirements of the Employment Rights Act 1996. Lighthouse will not refuse to consider a concern merely because its legal status is uncertain.

4. Who may use this policy

4.1 This internal procedure may be used by:

- employees and workers;
- agency workers and temporary staff;
- self-employed practitioners and consultants;
- contractors, subcontractors and suppliers;
- volunteers, students and work-experience participants;
- Directors and office holders;
- former workers who obtained relevant information through their work; and
- any other person working with or for Lighthouse who wishes to report organisational wrongdoing.

4.2 Statutory whistleblowing protection does not apply identically to every category above. Lighthouse nevertheless applies its non-retaliation, confidentiality and fair-handling commitments to all genuine concerns raised under this policy, so far as it lawfully can.

4.3 Learners, parents, carers, commissioners, neighbours and members of the public may raise concerns through the Complaints Policy, Safeguarding Policy or directly with the relevant authority. Where their information identifies organisational wrongdoing, Lighthouse may also record and review it through this procedure.

5. Concerns covered by this policy

5.1 A concern may relate to wrongdoing that has happened, is happening or is likely to happen, including:

- a criminal offence, fraud, theft, bribery, corruption or financial impropriety;
- a failure to comply with a legal, regulatory, contractual or commissioning obligation;
- a miscarriage of justice or deliberate interference with a fair process;
- a danger to the health or safety of a child, worker, visitor or member of the public;
- damage or likely damage to the environment;
- sexual harassment, including a failure to respond appropriately to reported sexual harassment;
- abuse, neglect, exploitation, discrimination, harassment or serious professional-boundary failure;
- unsafe staffing, vetting, recruitment, supervision, transport, premises, medication or activity arrangements;
- falsification, concealment, inappropriate alteration or destruction of records;
- misuse of confidential information, personal data, organisational funds, property or systems;
- abuse of authority, conflict of interest or decision-making for personal gain;
- serious breach of safeguarding, safer-working, data-protection, health and safety or quality procedures;
- retaliation against, intimidation of or attempts to identify a person who has raised a concern; or
- deliberate concealment of any of the above.

If in doubt - raise it

A concern does not need to fit neatly into a category. Lighthouse would rather assess a genuine concern promptly than have a person remain silent because they are unsure which procedure applies.

6. Matters normally handled under another procedure

6.1 The following will normally be handled under another policy unless they also reveal wider wrongdoing or public-interest risk:

- a personal complaint about pay, hours, working relationships or an individual management decision - normally the grievance or contractual route;
- a complaint about service quality or communication from a child, family or commissioner - normally the Complaints Policy;
- a safeguarding concern about a particular child - immediately the Safeguarding and Child Protection Policy;
- an allegation that an adult may have harmed a child or may be unsuitable to work with children - immediately the allegations and LADO procedure;

- a routine accident, equipment defect or premises hazard - the Health and Safety reporting process, unless it is being ignored, concealed or forms part of serious systemic failure;
- a disagreement with a professional judgement where there is no suspected wrongdoing; or
- a disciplinary or performance matter that does not indicate wider danger, illegality or concealment.

6.2 A concern may be handled under more than one procedure. Lighthouse will explain the route being used and will not allow procedural uncertainty to delay safeguarding or emergency action.

7. Lighthouse principles and commitments

- **Speak-up culture:** workers are expected to raise genuine concerns and leaders must respond without defensiveness.
- **No internal barrier:** contractual status, confidentiality, hierarchy or uncertainty about evidence must not prevent urgent reporting.
- **Fairness:** concerns are assessed objectively and the person whose conduct is questioned is treated fairly, subject to immediate risk controls.
- **Independence:** no person will manage or investigate a concern in which they are implicated or have a material conflict of interest.
- **Need-to-know confidentiality:** identity and information are restricted as far as possible, but secrecy cannot be guaranteed where disclosure is necessary for protection, fairness or law.
- **No retaliation:** victimisation, threats, exclusion, adverse work allocation, loss of opportunity or other detriment for speaking up is prohibited.
- **Proportionality:** action reflects the seriousness, credibility, immediacy and available evidence.
- **Learning:** concerns are used to improve systems even where individual wrongdoing is not substantiated.
- **External access:** lawful disclosure to safeguarding services, police, a legal adviser or an appropriate prescribed person will not be obstructed.

8. Roles and responsibilities

8.1 Board of Directors

The Board has overall accountability for the whistleblowing framework. It will provide independent reporting routes, protect records, ensure conflicts are managed, appoint competent investigators, monitor retaliation risk, receive assurance about outcomes and make required external referrals.

8.2 Whistleblowing Lead - Adam Waldron, Director

The Whistleblowing Lead receives concerns, assesses immediate risk and conflicts, acknowledges disclosures, secures records, appoints an appropriate handler, maintains communication with the reporting person and ensures actions are completed. A concern involving Adam Waldron must not be handled by him.

8.3 Alternative Whistleblowing Contact - Rachel Waldron, Director

Rachel Waldron provides an alternative internal route, acts where the Whistleblowing Lead is unavailable or implicated, and ensures safeguarding concerns are connected immediately to the DSL, Deputy DSL, LADO, children's social care or police as required. A concern involving Rachel Waldron must not be handled by her.

8.4 Managers, practitioners and all adults

- raise concerns promptly and provide information honestly;
- do not investigate, confront suspected wrongdoers or access records without authority;
- preserve relevant information and follow lawful instructions;
- maintain confidentiality and avoid speculation or workplace gossip;
- cooperate with internal and external investigations;
- report suspected retaliation or evidence interference immediately; and
- continue to take direct safeguarding or emergency action where required.

9. Raising a concern internally

9.1 A concern may be raised verbally or in writing. Written reporting is helpful but is not compulsory. The person may contact:

Internal route	When to use	Telephone	Email / method
Adam Waldron - Director and Whistleblowing Lead	Usual first point of contact, unless involved or unavailable.	07436 177831	Adam.waldron@lighthouselearningprovision.co.uk
Rachel Waldron - Director and Alternative Contact	Where Adam is unavailable, involved, or the person prefers this route.	07436 177831	Rachel.waldron@lighthouselearningprovision.co.uk
Board of Directors	Where an uninvolved Director is required or the concern is about senior leadership.	07436 177831	info@lighthouselearningprovision.co.uk - mark PRIVATE: WHISTLEBLOWING

9.2 The reporting person may ask a colleague or representative to support them at meetings. A companion must respect confidentiality and must not interfere with evidence or safeguarding processes.

9.3 Internal reporting is encouraged where it is safe and appropriate because it may enable prompt action. It is not a requirement before contacting emergency services, safeguarding authorities, a legal adviser or an appropriate prescribed person.

10. Concerns involving Directors or conflicts of interest

- A concern involving Adam Waldron must be raised with Rachel Waldron, another uninvolved Director or an appropriate external body.
- A concern involving Rachel Waldron must be raised with Adam Waldron, another uninvolved Director or an appropriate external body.
- Where both named contacts are involved, the reporting person should contact another uninvolved Director, the commissioning school or Local Authority, the relevant LADO or safeguarding service, police, or another appropriate prescribed person.
- Where all Directors may have a conflict, the Board will not investigate itself. An independent investigator, professional adviser or external authority must be used.
- The conflict assessment and reasons for the chosen handler will be recorded.

11. Immediate safeguarding, safety or criminal concerns

Urgent action takes priority

Call 999 where there is immediate danger, serious injury or a crime in progress. Contact children's social care, police or the relevant LADO directly where delay could place a child at risk. Tell the internal safeguarding lead as soon as it is safe, but do not wait for permission.

11.1 A whistleblowing disclosure is not a substitute for direct safeguarding reporting. Concerns that an adult has harmed a child, may pose a risk of harm, may have committed a relevant offence or may be unsuitable to work with children must follow the allegations procedure and be discussed with the relevant LADO or duty route.

11.2 Suspected serious fraud, theft, violence, cybercrime, evidence destruction or other criminal conduct may require immediate police or specialist reporting. The person raising the concern must not attempt to secure evidence by unlawful access, covert intrusion or actions that create danger.

11.3 Health and safety danger must be controlled immediately where possible. Work or activity must be stopped where there is serious and imminent risk, and HSE or the enforcing authority contacted where appropriate.

12. Information to provide and preserving evidence

12.1 A disclosure should provide, where known:

- what happened, is happening or may happen;
- when and where events occurred;
- names or roles of people involved and people at risk;
- how the person became aware of the information;
- witnesses, records, messages, financial entries, photographs or other relevant sources;
- any previous report and the response received;
- why the matter is believed to be in the public interest or to present wider risk;
- any immediate safeguarding, safety, retaliation or evidence-preservation concern; and
- how the reporting person wishes to be contacted and whether confidentiality is requested.

12.2 Lack of complete information is not a reason to delay. The recipient will help record the concern and distinguish known facts, observations, information from others and uncertainty.

12.3 Relevant records must be preserved. No person may destroy, amend, conceal or manufacture evidence. Access to personal data and organisational systems must remain lawful and limited to the person's authorised role.

13. Confidentiality, identity and anonymous concerns

13.1 Lighthouse will protect the identity of the reporting person as far as reasonably possible. Information will be shared only with those who need it to assess risk, investigate, obtain advice or comply with legal and safeguarding duties.

13.2 Complete confidentiality cannot be guaranteed. Identity may need to be disclosed where required by law, necessary for a fair process, essential to protect a child or another person, or unavoidable because the facts identify the source. The reporting person will be told before disclosure where it is lawful and practicable to do so.

13.3 Anonymous concerns will be assessed according to seriousness, immediacy, credibility, detail and the possibility of confirming information independently. Anonymous reporting may limit questions, feedback and the ability to investigate, but it will not be dismissed for that reason alone.

13.4 Lighthouse will not make unnecessary attempts to identify an anonymous source. Deliberate attempts to expose, intimidate or retaliate against a reporting person are themselves serious concerns.

14. Initial assessment and acknowledgement

14.1 The recipient will make a secure record and, normally within two working days, acknowledge the concern or confirm that it has been received. Immediate-risk cases will be acted on at once.

14.2 The initial assessment will consider:

- immediate safeguarding, health, safety, financial or evidence risk;
- whether police, LADO, children's social care, HSE, ICO, commissioner or another authority must be contacted;
- whether the concern falls under this policy, another procedure or more than one route;
- conflicts of interest and the independence and competence required of the handler;
- confidentiality and anonymity requests;
- possible retaliation or wellbeing risk to the reporting person or witnesses;
- whether the subject should be removed from particular duties or access while risk is assessed; and
- the scope, timescale, records and communication plan.

14.3 The person raising the concern will be told who their contact is, the procedure being followed and an indicative review date. Where no investigation will take place, Lighthouse will explain the reason so far as confidentiality and legal duties allow.

15. Investigation and external referral

15.1 An investigation will be proportionate, impartial and sufficiently independent. Its purpose is to establish relevant facts and decide what action is required, not to predetermine blame.

15.2 The investigator will:

- define the issues and terms of reference;
- secure and review relevant records;
- interview the reporting person, subject and witnesses where appropriate;
- distinguish fact, corroboration, disputed evidence and professional judgement;
- maintain an evidence and decision log;
- avoid unnecessary disclosure of identities;
- consider whether new information changes immediate risk controls;
- consult specialist advisers where competence is required; and
- produce findings and recommendations based on the balance of available evidence for internal purposes, unless an external legal standard applies.

15.3 An internal investigation will be paused, limited or coordinated where police, LADO, children's social care, HSE, ICO, a commissioner or another authority advises that internal action could prejudice its process.

15.4 Lighthouse aims to provide a substantive update within ten working days. Complex cases may take longer. The reporting person will receive periodic updates and a revised date, normally at intervals no longer than ten working days, subject to legal and confidentiality constraints.

16. Findings, outcomes and feedback

16.1 Possible outcomes include:

- urgent safeguarding, police, regulatory or professional referral;
- disciplinary, contractual, capability or governance action;
- changes to staffing, supervision, access, risk assessment or working arrangements;
- correction of records, financial controls or data-protection practice;
- additional training, audit, external review or commissioner assurance;
- policy, procedural or cultural improvement;
- no further action where evidence does not support the concern; or
- a finding that the concern cannot be resolved conclusively, with proportionate risk controls and monitoring.

16.2 The reporting person will be told whether the concern was considered, whether appropriate action has been taken or is planned, and whether the case is closed. Lighthouse may not disclose confidential employment action, personal data, safeguarding information or details that could prejudice another process.

16.3 A reporting person who reasonably believes the concern remains unaddressed may request review by an uninvolved Director or use an appropriate external route. A review will examine whether the concern was assessed fairly, key evidence was considered and necessary action was taken; it will not automatically repeat the full investigation.

17. Protection from detriment and retaliation

17.1 No person will be dismissed, removed from work, denied opportunities, threatened, bullied, isolated, given punitive work allocation, subjected to adverse references or otherwise disadvantaged because they raised or supported a genuine public-interest concern.

17.2 Statutory protection applies where the legal conditions for a protected disclosure are met. Lighthouse's internal protection is broader and applies to genuine concerns raised responsibly under this policy, including by people whose contractual status may fall outside the statutory definition of worker.

17.3 Any suspected retaliation must be reported immediately and will be assessed as a separate serious concern. Lighthouse will consider practical protection including changed reporting lines, contact boundaries, welfare support, preservation of work opportunities and monitoring after the investigation.

17.4 Managers and colleagues must not pressure a person to withdraw a concern, reveal an anonymous source, agree to secrecy, alter evidence or avoid an external safeguarding or legal route.

18. Concerns not upheld and deliberately false reports

18.1 No action will be taken against a person merely because a genuine concern is mistaken, unsubstantiated or not upheld. An outcome of insufficient evidence does not mean the concern was malicious.

18.2 Where there is clear evidence that a person knowingly fabricated information or made a report maliciously for personal gain or to harm another person, the matter may be considered under disciplinary, contractual or legal procedures. This threshold is high and must not be used to silence criticism, challenge or reasonable reporting.

18.3 A person's motive does not remove Lighthouse's duty to assess credible information about danger or wrongdoing.

19. External disclosures, prescribed persons and independent advice

19.1 A worker may seek confidential advice from a legal adviser, Acas, a trade union or another appropriate adviser. A person may also make a disclosure to a prescribed person or body where the matter falls within that body's remit and the statutory conditions are met.

19.2 The Government maintains the current list of prescribed persons and their areas of responsibility. The reporting person should check that the selected body covers the type of wrongdoing. Wider disclosure, including to the media, has stricter legal conditions and independent advice should be sought before doing so.

19.3 Appropriate routes may include:

Route	Examples of matters	Contact / note
Emergency services	Immediate danger, serious injury or crime in progress.	999; police non-emergency 101.
Children's social care / LADO	Risk to a child, allegations or suitability concerns about adults.	Use the current Suffolk or Norfolk route in the Safeguarding Policy.
NSPCC Whistleblowing Advice Line	How child-protection concerns are being handled within an organisation.	0800 028 0285; help@nspcc.org.uk.
Acas	Independent information about workplace whistleblowing rights.	0300 123 1100.
Health and Safety Executive or local enforcing authority	Serious workplace health and safety concerns within the regulator's remit.	Use the current HSE online reporting route.
Information Commissioner's Office	Serious data-protection or information-rights wrongdoing within the ICO remit.	ICO online route or 0303 123 1113.
Department for Education / Ofsted	Only where the matter falls within the published prescribed-person remit.	Check the current GOV.UK prescribed persons list; Ofsted is not Lighthouse's general complaints body.
Commissioning school or Local Authority	Placement, safeguarding, contractual or public-service concerns.	Use the commissioner's named contact, DSL or whistleblowing route.
Legal adviser, trade union, MP	Independent advice or a disclosure permitted by whistleblowing law.	Seek prompt advice because legal conditions and time limits can be complex.

19.4 Lighthouse will not obstruct or retaliate against a lawful disclosure. It may, however, require people to protect children's identities, personal data and confidential information that is not necessary for the external body to receive the concern.

20. Records, data protection and retention

20.1 Whistleblowing records are stored securely and separately from ordinary personnel or operational records, with access restricted to authorised people. The record will include the disclosure, risk assessment, conflict check, correspondence, evidence, decisions, findings, action and feedback provided.

20.2 Personal information will be processed lawfully, fairly and proportionately. Records will distinguish the identity of the reporting person from the substantive concern where possible. Subject-access and disclosure requests will be considered carefully because records may contain third-party, safeguarding, legal-privilege or investigation-sensitive information.

20.3 Records will be retained under Lighthouse's retention schedule, taking account of safeguarding, employment, limitation, insurance, contractual and regulatory requirements. Information will not be retained longer than necessary, but records must not be destroyed while a case, appeal, claim, external process or foreseeable legal need remains active.

21. Training, monitoring and review

21.1 All workers will be told at induction how to raise concerns, who the named contacts are, how safeguarding and whistleblowing routes interact, and that retaliation is prohibited. Directors and managers will receive role-appropriate training in receiving disclosures, confidentiality, conflicts, immediate risk and fair investigation.

21.2 The Board will review anonymised information about:

- number and type of concerns;
- acknowledgement and completion times;
- external referrals and urgent actions;
- outcomes and implementation of recommendations;
- retaliation, confidentiality or evidence-interference concerns;
- repeat themes, locations, roles or systems; and
- worker confidence and lessons for culture, policy and training.

21.3 This policy will be reviewed at least annually and sooner after a significant case, legal change, safeguarding review, commissioner requirement or material change to Lighthouse's structure or services.

22. Reference framework

Core external framework

- Employment Rights Act 1996, Part IVA, as amended;
- Public Interest Disclosure Act 1998;
- Employment Rights Act 2025 - whistleblowing protection relating to sexual harassment;
- GOV.UK - Whistleblowing guidance for employers;
- GOV.UK - Whistleblowing for employees;
- GOV.UK - current list of prescribed people and bodies;
- Acas - Whistleblowing at work;
- Working Together to Safeguard Children 2026;
- NSPCC Whistleblowing Advice Line;
- HSE - raising a workplace health and safety concern; and
- ICO - protected disclosures and data-protection concerns.

External legal and contact information checked 20 July 2026. Current official legislation, guidance and prescribed-person remits take precedence if a source changes.