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1. Introduction

- 1.1. Tutor Train Ltd is committed to upholding the highest standards of honesty, integrity, and transparency. We hold our students' well-being, quality of education and safety in the highest regard. This Whistleblowing Policy serves as our dedicated framework to provide a safe, confidential channel for our Tutors, students, and other concerned parties to report genuine concerns about any misconduct, illegal activities, or unethical behaviour within our organisation.
- 1.2. We are committed to compliance with the Bribery Act 2010 and actively encourage a culture of honesty and openness; therefore, all Tutors must share any issue that, in the Tutor's opinion, might constitute bribery or corruption.
- 1.3. The purpose of this policy is to:
- 1.4. Foster an environment that promotes reporting of improper or illegal conduct.
- 1.5. Establish a secure, confidential process for whistleblowers to voice their concerns.
- 1.6. Ensure that every reported concern undergoes a thorough and swift investigation.
- 1.7. Safeguard whistleblowers from any form of retaliation or victimisation.

2. Definitions

- 2.1. Whistleblower: Any individual who reports concerns or misconduct within Tutor Train Ltd.
- 2.2. **Protected Disclosure:** A report made in good faith that reveals legitimate concerns about unethical, illegal, or inappropriate activities within the organisation.

3. Specific Subject Matter

If a Tutor becomes aware of information that reasonably suggests one or more of the following:

- 3.1. A criminal offence has been, is being, or is likely to be committed.
- 3.2. A person has failed, is failing, or is likely to fail to comply with any legal obligation, including safeguarding.
- 3.3. A miscarriage of justice, whether past, present, or likely.
- 3.4. The health or safety of any individual has been, is being, or is likely to be endangered.
- 3.5. Environmental harm has occurred, is occurring, or is likely to occur.
- 3.6. Information tending to reveal any of the above is being or is likely to be, deliberately concealed.
- 3.7. The business or any associated person has been, is being, or is likely to be involved in offering or receiving bribes; they must utilise the Tutor Train's disclosure procedure as outlined below.



4. Protection for Whistleblowers

4.1. Tutor Train Ltd is unequivocally committed to protecting whistleblowers from any form of retaliation, discrimination, or victimisation due to their report. Anyone engaging in such actions will be subject to disciplinary measures.

5. Reporting concerns (including low-level concerns)

- 5.1. Should an allegation concerning student safeguarding be made against a Tutor, an initial investigation will be carried out by the Designated Safeguarding Lead (DSL Praema Stelling), as outlined in the Tutor Train's Safeguarding and Child Protection Policy.
- 5.2. Concerns should be submitted in writing via the Whistleblowing Disclosure Form, detailing the issue's background, names, dates, and locations. If the person reporting is uncomfortable with written disclosure, an interview can be arranged, which would be recorded. Third-party representatives may also be involved as needed.
- 5.3. The DSL will inform the student's parents/carers. The DSL will refer the incident to the Local Authority if the allegation is serious. The Local Authority must be contacted within 24 hours if the allegations concern a person who works with children and young people and they have:
 - 5.3.1. Behaved in a way that has harmed or may have harmed a child.
 - 5.3.2. Possibly committed a criminal offence against or related to a child.
 - 5.3.3. Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
 - 5.3.4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 5.4. If the allegation is made against the DSL, Praema Stelling, DSL, will inform the Local Authority.

 Again, an independent investigator may need to be brought in in consultation with the Local Authority.
- 5.5. The Local Authority would help to ensure that the student is adequately safeguarded and that the case is dealt with quickly and escalated to the appropriate authorities where required.
- 5.6. Tutor Train Ltd will maintain fairness to all parties during the investigation, including the person who made the allegation and the person against whom the allegation was made.



6. Low-level concerns

6.1. Low-level concerns, though not insignificant, encompass any issue, no matter how small, suggesting an adult working for Tutor Train Ltd has violated the Code of conduct or acted in a way not warranting referral to the LADO. Promptly report all concerns, including 'low-level,' to Praema Stelling.

7. Tutor Concerns

- 7.1. We strongly encourage tutors to raise any concerns regarding matters described in this policy.
- 7.2. For concerns related to a student, please refer to Tutor Train Ltd's Safeguarding and Child Protection Policy.
- 7.3. In emergencies requiring immediate action to ensure a student's safety, please contact the police at 999.

8. Reporting a concern to an external body

8a. This policy is intended to provide a route by which concerns can be raised internally. However, if the Tutor/Client is unhappy with the outcome of an investigation or if, for any reason they do not feel comfortable raising their concern internally, they are free to take the matter outside of the organisation to a prescribed person or body or to their Member of Parliament (MP).

The full list of prescribed persons and bodies can be found on the UK government website at www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies.