



## Whistleblowing Policy

**Date: 08/11/2025**

### 1. Introduction

**We, Lily Bloom Tutoring C.I.C, Leeds, LS8 (“we”, “Lily Bloom Tutoring C.I.C”), are committed** to the highest possible standards of honesty, openness and accountability and will not tolerate malpractice or wrongdoing.

Whistleblowing Policy is a vital element of our governance arrangements and is designed to allow those employed by the Company to come forward and raise both disclosures and serious allegations of wrongdoing involving the actions of the Company’s employees, its contractors or any aspect of the Company’s activities.

As such the Company is committed to a policy which seeks to protect those individuals who make certain disclosures with regard to any instance of malpractice or wrongdoing and to investigate them in the public interest.

Whistleblowing is generally the term used when someone who is employed in an organisation reports a concern about suspected wrongdoing, malpractice, illegality or risk in the workplace.

This can include:

- criminal offences; failure to comply with a legal duty; miscarriages of justice; fraud or corruption; abuse of authority; serious breaches of Company policy or procedure; unethical conduct and actions deemed unprofessional or inappropriate; the health and safety of any individual has been, or is likely to be, endangered; the environment has been, is being or is likely to be, damaged; ,



information about any of the above has been, is being, or is likely to be, deliberately concealed.

This policy seeks to set out how the Company will handle and respond to serious allegations of perceived wrongdoing.

## **2. Aims and Scope**

1. Our whistleblowing policy seeks to cover all disclosures and allegations made by employees of the Company.
2. It also extends to any other individual who wants to raise an allegation of perceived wrongdoing. This could include consultants, contractors, sub-contractors who are engaged in work for the Company or anyone who uses the Company's services.
3. This policy has specific sections to advise those employed by Company to be followed when raising a disclosure or allegation and how the Company will respond.
4. The policy seeks to:
  - provide for a culture of zero tolerance toward fraud and corruption and deter wrongdoing;
  - encourage employees and others with serious concerns about any aspect of the Company's work to feel confident to come forward and voice those concerns;
  - raise concerns at an early stage and in the right way ensuring that critical information gets to the people who need to know and who are able to take action;
  - provide safeguards to reassure those who raise concerns in the public interest and not maliciously or for personal gain, that they can do so without fear of reprisals or victimization or disciplinary action, regardless of whether these are subsequently proven;
  - set out how the Company will respond to allegations made and enable them to get feedback on any action taken;
  - ensure that employees know what to do if they are not satisfied with actions taken.



5. The whistleblowing policy is not to be used where other more appropriate internal reporting procedures are available. There are existing Company procedures which enable employees to lodge a grievance relating to their conditions of employment, raise matters of harassment or to make a general complaint.

6.

This whistleblowing policy covers concerns that fall outside the scope of those existing internal procedures. Equally, any allegations made through the above procedures, which raise serious concerns over wrongdoing, the Company will investigate under the whistleblowing process.

### **3. What is Whistleblowing**

1. Whistleblowing is the confidential disclosure by an individual of any concerns relating to a perceived wrongdoing involving any aspect of the Company's work or those who work for the Company. The whistleblowing process assists individuals, who believe they have discovered malpractice, impropriety or wrongdoing, to raise a concern, in order that this can be addressed.

2. The **Public Interest Disclosure Act 1998 (PIDA)** is known as the Whistleblowing law and is designed to encourage and enable employees to "speak out" and to report suspected wrongdoing at work. This is commonly known as "blowing the whistle".

3. PIDA legislation legally protects employees from any detriment from their employer or colleagues that arises as a result of making a "protected disclosure" (a qualifying disclosure) in the public interest. This includes protection from harassment, victimisation or dismissal by their employer.

4.

A qualifying disclosure means any disclosure of information made to the Company or other prescribed person, which in the reasonable belief of the worker making the disclosure, is made in the public interest and tends to show one or more of the following:



- that a criminal offence has been committed, is being committed or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health or safety of any individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged; or
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

5. A disclosure of information is not a qualifying disclosure if the person making the disclosure commits an offence by making it.

6. A prescribed person is someone who is independent of the employee's organisation, but usually has an authoritative relationship with the organisation, such as a regulatory or legislative body.

7. Whilst protection under PIDA covers most workers it is not extended to partners, contractors, non-executive directors, volunteers or the self-employed. However, the principles outlined in this policy, as far as they can be, will be applied to Whistleblowing allegations received from sources other than employees of the Company. As with internally reported cases, particular consideration needs to be given to matters of confidentiality.

#### **4. Making a disclosure or raising a concern**

1. Once an employee or other has decided to raise a concern, then wherever possible, it should be expressed either verbally or in writing. This should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the individual is particularly concerned about the situation.



2. Although individuals raising concerns are not expected to have supporting evidence to prove the truth of an allegation before reporting, he or she must reasonably believe that the information is substantially true to enable the matter to be taken forward.

## **5. Whistleblowing by employees**

1. It is the hope and intention of the Company that any employee with a concern about any aspect of the Company's operations or its conduct, feels able to first raise those concerns internally with line management. This includes where an employee wants to make a protected disclosure to their manager.

2. However, under the terms of PIDA, if an employee does not feel comfortable making a disclosure internally within the Company they have the right to take their concerns outside the Company to certain 'prescribed regulators'.

3. Before making a disclosure, an employee may first wish to discuss the concern on a confidential basis with a work colleague, trade union representative, solicitor or professional body and seek advice on how to proceed. These discussions may help assess how justified their concern is and, if they then wish to proceed, the most appropriate and effective way to report it. This is important because the report should be made so as to allow the most effective investigation, whilst affording the whistleblower protection under the PIDA.

4. Employees are protected when they make a disclosure. In making a protected disclosure the employee must:

4.1. reasonably believe that the disclosure they are making is in the public interest;

4.2. reasonably believe that the information detailed and any allegation in it are substantially true; and

4.3. the matter disclosed must fall within the matters prescribed for that regulator.

5. The earlier an employee expresses a concern, the easier it will be to take action. Employees should raise a concern as soon they have a reasonable suspicion and are not expected to investigate the concern themselves to prove their suspicions are well-founded.



## **6. Whistleblowing by members of the public**

If you are not a Company employee you can still contact the Company to report any concerns or disclosures over wrongdoing and these will be treated in the same way. Unlike disclosures made by employees, protection under PIDA law does not extend to disclosures made by members of the public.

## **7. How to report a Whistleblowing concern**

1. Anybody who has a whistleblowing concern relating to the Company can use our whistleblowing reporting procedures. A person who wishes to report a concern or suspected serious wrongdoing (a disclosure) should contact us in one of the following ways:

1.1. E-mail your concerns to us at: [Iqbals@lilybloomtutoringcic.com](mailto:Iqbals@lilybloomtutoringcic.com)

1.2. Contact us by telephone: 07920035685

1.3. Concerns can also be reported in writing to: Sobia Iqbal (Director), Leeds, LS8

2. Company's employees can report a concern through their manager if they feel confident to do so. The manager must follow the obligation of confidentiality and reporting procedures.

3. For monitoring purposes, all whistleblowing cases referred to managers must be reported on receipt. This may be done by the Whistleblower, the receiving manager or the senior manager investigating the allegations.

4. Any person reporting a concern should provide as much information as possible, including:

4.1. who the allegations are against;

4.2. full details on the nature of the alleged wrongdoing;

4.3. provide any evidence they have in support of the allegation;

4.4. state if the person making the disclosure is an employee of Company;

4.5. name and contact details (unless they wish to remain anonymous).



5. Any calls made to the Company will gather as much information as possible about the concerns raised. If contact details are provided we may get in touch to seek further information.

6.

In the event that an employee does not feel comfortable in making a disclosure to the Company then you are entitled to make a protected disclosure to one of the prescribed organisations listed.

**[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/183340/11-641-blowing-the-whistle-to-a-prescribed-person.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/183340/11-641-blowing-the-whistle-to-a-prescribed-person.pdf)**

## **8. How the Company will Respond**

1. The Company will formally respond to you to acknowledge receipt of a disclosure within three (3) working days of the concern being received.
2. A further acknowledgement will be sent within seven (7) working days to indicate:
  - 2.1. how the Company proposes to deal with the matter; and the policy under which it will be investigated;
  - 2.2. whether the Company considers it to be a protected disclosure;
  - 2.3. contact details for the officer handling the investigation;
  - 2.4. arrangements for confidentiality;
  - 2.5. an estimate of how long it will take to provide a response on the outcome;
  - 2.6. any initial enquiries which may have been made;
  - 2.7. if no action is planned, why not.
3. All allegations will be handled confidentially and discreetly by those managers who are directly involved in the investigating process. The ongoing point of contact for the whistleblower will be given in the acknowledgement letter.



4. If necessary, further information will be sought from the whistleblower. This will depend on the nature of the matters raised, the potential difficulties involved in conducting an investigation and the clarity of the information provided.
5. At any meeting arranged to discuss an employee's concerns the employee has the right, if they so wish, to be accompanied by their Trade Union representative or a friend who is not involved in the area to which the concern relates.
6. The Company will do what it lawfully can to minimise any difficulties that an employee may experience as a result of raising a concern. For example, if an employee is required to give evidence in criminal or disciplinary proceedings, the Company will advise you about the procedures in terms of what will happen and what will be expected of you.

## **9. Anonymous allegations**

1. The Company recognise that there may be circumstances where individuals are worried about being identified when they report concerns about their employer. If you have come to us anonymously and not provided your contact details we will treat your allegations just as seriously. However, this policy encourages individuals to put their name to an allegation wherever possible as we believe that open or confidential whistleblowing is the best means of addressing the concerns and protecting individuals.
2. Concerns expressed anonymously are more difficult to investigate, and harder to substantiate, and further liaison with the whistleblower is not possible. Nevertheless, anonymous allegations will always be individually considered and action taken depending upon:
  3. the seriousness of the issues raised;
  4. the credibility of the concern; and
  5. the likelihood of confirming the allegations from attributable sources.

## **10. Outcomes**

1. The Company will, subject to legal constraints, seek to advise the whistleblower on the outcomes of the investigation in order to assure them that that the matter has been properly addressed. Some concerns raised may be resolved by agreed action, once the whistleblowers concerns have been explained, without the need for investigation.
2. Investigation reports will be required for all cases.



## **11. Safeguards**

In order to ensure that allegations are investigated in the right spirit with the right outcome, the following safeguards or principles should be applied in all cases.

## **12. Confidentiality and Anonymity**

1. The Company's Whistleblowing policy seeks to protect the identity of the individual making a disclosure, meaning that your name will not be revealed without your explicit consent, even if the disclosure is not considered to be a qualifying disclosure under the PIDA. Your name will initially be logged at the outset and will be visible at times when data monitoring is taking place.
2. However, in alleged cases of serious wrongdoing, it must be appreciated that the Company cannot guarantee that this will be maintained particularly if external legal action results from the disclosure. In some cases, an employee's concern may require further action and they may have to act as a witness and/or provide evidence, for example serious criminal offences which are referred to the Police.
3. If your disclosure relates to a child at risk or abuse of a vulnerable adult then the Company is required to investigate this under separate procedures and this takes priority over any request for anonymity. If you have provided your contact details, the Company will of course advise you of the action being taking.

## **13. Harassment and Victimisation**

1. The Company acknowledges that the decision to report a concern can be a difficult decision for an employee to take, not least because of the fear of reprisal from those responsible for the malpractice. Any employee who makes a 'qualifying disclosure' which meets the requirements of the PIDA is legally protected against victimisation or harassment for whistleblowing.
2. The Company will not tolerate harassment or victimisation against an employee who has raised a genuine concern under the whistleblowing policy. Any employee who



victimises a whistleblower will be subject to a disciplinary action which may lead to dismissal.

3. Any employee who believes they have been victimised as a result of making a disclosure or blowing the whistle should report their concerns to the manager.

#### **14. False and malicious allegations**

1. While encouraging employees to bring forward matters of concern, the Company must guard against claims which are untrue. This is because of the risk of claims made to deliberately damage the reputation of other employees or the Company as a whole and not least because the cost of investigation is high.

2. If an employee makes an allegation, but it is not confirmed by the investigation, no action will be considered or taken against them. However, if an employee makes false, malicious or vexatious allegations this will be treated as a serious disciplinary offence and disciplinary action will be taken. The PIDA only offers protection from dismissal or detriment if the worker reasonably believes their disclosure was made in the public interest.

#### **15. Misuse of the policy**

The Whistleblowing policy is designed to promote and encourage reporting genuine concerns. The policy is not designed to allow:

1. individuals who have acted inappropriately to escape punishment by highlighting any malpractices they were involved in;
2. employment protection in relation a redundancy situation or pre-existing disciplinary issues as a result of reporting a wrongdoing;
3. an individual to raise a concern for some private motive and not to prevent or correct the wrongdoing.

#### **16. Data Protection and FOI**

1. The Freedom of Information Act 2000 gives a general right of access to all types of recorded information held by public authorities. As such the Company often receives requests for information under the Freedom of Information Act.



2. The Company has a legal obligation to provide the information unless it falls under one of the exemptions of the Act.
3. The Freedom of Information Act contains exemptions which may be applicable to permit the withholding of information identifying the whistleblower, including:
  - 3.1. Section 40 Personal Data;
  - 3.2. Section 41 Information which, if disclosed, would give rise to an actionable breach of confidence.
4. Many people making a disclosure to the Company will wish to protect their identity and the Company will always seek to protect the identity of individuals during the course of progressing an investigation. If the Company receives a request for information identifying a whistleblower, the Company will contact the whistleblower to seek their views beforehand and will, wherever possible, seek to comply with those views.
5. The principle of maintaining confidentiality should also be applied to the identity of any individual who may be the subject of a disclosure.
6. The Company will ensure that our handling of concerns meets the requirements of the Data Protection Act 1998 and the Freedom of Information Act 2000.

## **17. Training and Awareness**

1. Managers are responsible for ensuring that their employees are aware of the whistleblowing policy and process and that any training needs are addressed which may arise from the application of the policy. Raising awareness of the Company's Whistleblowing Policy should form part of the induction training for all employees and should be addressed as refresher training for all employees.
2. Employees have a responsibility to ensure that they are aware of and understand the Company's policy in relation to Whistleblowing.