WHISTLEBLOWING POLICY

Date of Policy: 11/06/2026

This policy will be reviewed every 12 months (as a minimum).

Review Date: 11/06/2027

AP Education is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices.

We expect all staff to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

We therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.

We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.

All staff should report any low-level concerns about colleagues that do not meet the harm threshold but may indicate inappropriate conduct. These will be recorded and managed in line with KCSiE guidance

This policy does not form part of any contract; AP Education reserves the right to amend this policy at any time without prior notice.

Who can raise a concern under this policy?

This policy applies to all current and former employees, workers, officers, consultants, contractors of our business, including home workers, trainees, apprentices, agency workers and limited company contractors.

No qualifying length of service is required in order to raise a concern under this policy.

When to use this policy

This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe 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 or she is subject
- that a miscarriage of justice has occurred, is occurring or is likely to occur; or that the health or safety of an individual has been, or is being or is likely to be endangered; or
- that the environment has been, is being or is likely to be damaged; or
- that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

You must reasonably believe that the disclosure is being made in the public interest. It doesn't matter if you are mistaken about your concern, but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

Low-Level Concerns

In accordance with Keeping Children Safe in Education (KCSIE) 2025, AP Education encourages all staff to report any low-level concerns regarding the conduct of colleagues or other adults working with children, even where the behaviour does not meet the threshold for managing allegations.

A low-level concern is any concern, no matter how small, that an adult working with children may have acted in a way that:

- is inconsistent with the AP Education Staff Code of Conduct;
- does not meet the harm threshold for an allegation; but
- may indicate inappropriate conduct or professional boundary issues.

Examples may include:

- inappropriate language or humour;
- unnecessary one-to-one contact outside agreed procedures;
- inappropriate use of personal devices or social media;
- favouritism towards a learner;
- failure to follow safeguarding procedures; or
- behaviour that causes a colleague to feel uneasy, even if there is no immediate safeguarding risk.

All low-level concerns must be reported promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL. Concerns will be recorded, reviewed and managed in accordance with KCSIE guidance and AP Education's Safeguarding and Allegations Policies. Where a pattern of behaviour emerges or further information becomes available, the concern may be escalated through the formal allegations management process.

Disclosures that are not covered by this policy

You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between AP Education and our lawyers regarding a specific case).

If your concern relates to your own treatment as an employee of AP Education including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.

If your concern relates to your own treatment or personal circumstances at work but you are not an employee of AP Education, you should use our Complaints Policy instead of the grievance procedure.

Our Complaints Policy is available from our website www.ap-education.com

Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our Complaints Policy instead.

Training, Awareness and Accessibility of the Whistleblowing Policy

Staff Training on Whistleblowing

AP Education is committed to ensuring that all staff understand their responsibilities in relation to whistleblowing, particularly where concerns relate to safeguarding, professional conduct, or the welfare of children and young people.

All staff, including tutors, agency workers, volunteers, and management, will receive training that enables them to:

- Recognise what constitutes a whistleblowing concern, including safeguarding-related disclosures
- Understand the difference between whistleblowing, low-level concerns, and complaints
- Respond appropriately when a concern is identified or disclosed
- Know how to report concerns internally and externally
- Understand the protections in place for whistleblowers

This training forms part of:

- Induction processes (mandatory prior to engagement in delivery)
- Safeguarding training programmes, aligned with statutory guidance
- Role-specific training, particularly for those in leadership or safeguarding roles (e.g. DSL/DDSL)

Training content will include real-life scenarios relevant to alternative provision settings, including:

- Concerns arising in one-to-one tuition environments (e.g. home/community settings)
- Professional boundary concerns
- Safeguarding practice concerns involving staff or third parties

Ongoing Training and Awareness

AP Education recognises that whistleblowing awareness must be actively maintained and embedded within organisational culture.

To support this, the organisation will:

- Provide regular refresher training on whistleblowing and safeguarding reporting processes
- Issue updates following any changes to legislation, statutory guidance, or internal policy
- Reinforce expectations through:
    - Team meetings
    - Supervision sessions
    - Compliance briefings
    - Safeguarding updates

- Ensure that whistleblowing remains a standing agenda item within safeguarding discussions where appropriate
- Promote a culture of openness and professional curiosity, where staff feel confident to raise concerns without fear of reprisal

All training and awareness activity will be recorded and monitored as part of the organisation's compliance and safeguarding oversight processes.

Awareness and Accessibility of the Whistleblowing Policy

AP Education ensures that all staff are aware of, and can easily access, the Whistleblowing Policy at all times.

This is achieved through:

- Provision of the policy at induction, with confirmation of understanding and acceptance
- Hosting the policy in accessible locations, including:
  - Internal shared systems / document portals
  - Staff training folders
- Clear signposting within:
  - Safeguarding training materials
  - Staff handbooks
  - Assignment documentation (where appropriate for tutors)

In addition:

- Staff are reminded regularly of the policy and how to access it
- Key reporting routes (including DSL contact details and external reporting options) are clearly communicated
- Staff are informed of their right to escalate concerns externally where necessary (e.g. Local Authority Designated Officer (LADO), Ofsted, NSPCC Whistleblowing Helpline)

The organisation ensures that all staff understand:

- That whistleblowing is a protected and supported action
- That concerns can be raised confidentially and without detriment
- That failure to report concerns, particularly safeguarding concerns, may place children at risk and may be treated as a disciplinary matter

Leadership Responsibility

The Senior Leadership Team are responsible for:

- Ensuring all staff receive appropriate whistleblowing training
- Monitoring compliance with training and awareness requirements
- Creating an environment where concerns are taken seriously and acted upon promptly
- Ensuring that all whistleblowing concerns, particularly those relating to safeguarding, are managed in line with statutory guidance and internal procedures

HOW TO RAISE A CONCERN

If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance make a disclosure to your Education Delivery Co-Ordinator.

If, for any reason, you feel that you cannot tell your Education Delivery Co-Ordinator you should firstly contact:

Sabrina Laverty
Operations and Compliance Manager/DSL
Tele: 02037610233
Email: slaverty@ap-education.com
Address: Ackerman Pierce Education Ltd, Willow House, Stadium Way, Harlow, Essex CM19 5GX

If you have made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with our company Director directly:

Raymond Jarvis
Tele: 0800 488 0424
Email: customercare@ap-education.com
Address: Ackerman Pierce Education Ltd, Willow House, Stadium Way, Harlow, Essex CM19 5GX

A disclosure of a concern can be made by telephone, in person or in writing (including by email). However, it is preferable for the disclosure to be made in writing so that we can keep an exact record of your concern.

You are not expected to prove the truth of your concern beyond reasonable doubt or provide any evidence; however, you will generally need to provide the following information as a minimum:

- the nature of the concern
- why you believe it to be true
- the background and history of the concern
- relevant dates where possible

You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.

You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

How we respond to concerns raised under this policy

We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally.

We will take the time to listen to any issues raised and arrange a meeting as soon possible to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

Any concerns you raise in line with this policy will be recorded in our external complaint and feedback register.

After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.

We will keep you informed of the progress of the investigation as it is carried out and when it is completed and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.

We will consider any concerns raised anonymously at our discretion, considering factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.

If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing.

Confidentiality

All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

Protection and support for those raising concerns

We hope that all staff will feel able to voice their concerns freely under this policy.

AP Education is committed to good practice and high standards and to being supportive of staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform our director, (see contact details within this document) immediately.

AP Education will not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No member of staff may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action.

To ensure the protection of all our staff and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.

If you are not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our Complaints Policy. Employees of AP Education can use our grievance procedure to address the issue instead.

Raising your concern externally

The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action in order to resolve the issue.

However, if for whatever reason you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true and in the public interest, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies that you can raise a concern with is available on the GOV.UK website via the following link:
https://www.gov.uk/whistleblowing

We strongly encourage individuals to seek appropriate advice before reporting a concern to an external person. Protect is a leading independent charity whose main objective is to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline. https://protect-advice.org.uk/

Further information and contacts

If you have any queries about the application of this policy, please contact the Compliance and Operations Manager in the first instance.

The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100 and the helpline is open Monday to Friday from 8am to 8pm and Saturday from 9am to 1pm.The website can be found here: https://www.acas.org.uk/about-us

If you are a member of a recognised trade union, you can also seek information and advice from your trade union representative.

Please be aware that this policy should be read in conjunction with AP Education's Safeguarding Policy and Allegations Policy.