
Whistleblowing Policy

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Approved By	Board of Directors
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Applies To	All employees, tutors, Teaching Assistants, agency workers, contractors and consultants acting on behalf of LTS Group Limited

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1. Policy Statement

LTS Group Limited is committed to the highest standards of honesty, integrity and accountability. We encourage anyone working for or on behalf of LTS to report genuine concerns about wrongdoing, and are committed to ensuring that anyone who raises a concern in good faith is protected and will not suffer detriment as a result.

2. Purpose

This policy provides a clear process for reporting concerns relating to unlawful, unethical or unsafe practices, gives confidence that concerns can be raised safely, and supports compliance with the Public Interest Disclosure Act 1998.

This policy does not cover personal employment grievances. Where a concern relates to your own treatment or employment rather than wider wrongdoing, this should be raised under LTS's grievance procedure instead.

3. Scope

This policy applies to all employees, tutors, Teaching Assistants, agency workers, contractors, consultants and anyone acting on behalf of LTS Group Limited.

4. What is Whistleblowing?

Whistleblowing is the raising of a concern, in good faith and in the public interest, about a danger, risk, malpractice or wrongdoing which affects others — whether within LTS or externally. It can also cover a failure to act appropriately to avoid a danger, risk or piece of malpractice.

Under the Public Interest Disclosure Act 1998, a concern is protected where it amounts to a 'qualifying disclosure' under section 43B of the Employment Rights Act 1996. This means the discloser reasonably believes that one or more of the following is happening, has happened, or is likely to happen:

- A criminal offence has been, is being, or is likely to be committed;
- A person has failed, is failing, or is likely to fail to comply with a legal obligation;
- A miscarriage of justice has occurred, is occurring, or is likely to occur;
- The health or safety of an individual has been, is being, or is likely to be endangered;
- The environment has been, is being, or is likely to be damaged;
- An individual has been, or is being, subjected to sexual harassment; or
- Information showing any of the above is being, or is likely to be, deliberately concealed.

A qualifying disclosure can relate to something that has already happened, is ongoing, or is likely to happen in the future, and can relate to conduct that took place overseas.

5. What Should Be Reported

Concerns may include safeguarding failures, fraud, financial malpractice, breaches of legal obligations, health and safety risks, modern slavery, discrimination, bribery, data protection breaches, serious misconduct or deliberate concealment of wrongdoing.

6. Protection from Detriment

Anyone who raises a genuine concern in good faith under this policy will not, under any circumstances, be subjected to any form of detriment or disadvantage as a result — even if the concern is not ultimately substantiated. Examples of detriment could include bullying or harassment, being overlooked for promotion or development opportunities, or having hours or duties reduced without good reason.

Any employee found to have subjected a colleague to detriment for raising a genuine concern will be subject to disciplinary action. Raising a concern under this policy does not halt or protect an individual from separate disciplinary, redundancy or investigation processes relating to their own conduct.

7. How to Raise a Concern

Concerns should normally be reported to a line manager, the Director of Operations, a Director, or the Designated Safeguarding Lead where the concern involves a safeguarding matter. Where you feel unable to raise a concern with your line manager — for example, because they are part of the concern — you should approach one of the other contacts listed at the end of this policy directly.

Concerns can be raised verbally or in writing, and should be raised as soon as possible. Where possible, please provide: the background to and reason for the concern; whether you have already raised it with anyone and their response; and any relevant dates or supporting information.

8. Investigation Process

All concerns will be assessed promptly and investigated thoroughly, impartially and proportionately to the issue raised. Where appropriate, LTS may involve external investigators, auditors, regulators or the police.

Whoever receives the disclosure will acknowledge it in writing as soon as reasonably possible, and will keep the individual informed in writing of the progress of the investigation and its likely timescale. Where possible, the identity of the person raising the concern will be protected throughout.

The individual who raised the concern will be offered a confidential interview as soon as possible, at which they may be accompanied by a colleague. On conclusion of the investigation, they will be told the outcome and what action has been taken or is proposed; where full details cannot be shared for reasons of confidentiality, this will be explained. If an individual remains unsatisfied with the outcome, they may put their concerns in writing to a Director, who will arrange any further investigation considered appropriate.

9. Confidentiality and Anonymity

The best way to raise a concern is openly, as this makes it easier for LTS to investigate thoroughly and follow up where needed. Whistleblowers are encouraged to give their name, and where they do, LTS will protect their identity so far as possible, unless disclosure is required by law.

Concerns raised anonymously will still be considered, at LTS's discretion, taking into account the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from other sources. Anonymous concerns are generally harder to investigate fully, so naming yourself, where you feel able to, helps us act on a concern more effectively.

10. Malicious Allegations

Anyone who raises a concern in good faith and in the public interest, with a reasonable belief in its truth, will not be subject to any action against them, even if the concern is not subsequently confirmed by investigation. This protection does not extend to a person who commits an offence by making the disclosure itself, or to matters covered by legal professional privilege.

LTS may take disciplinary action against anyone found to have knowingly made a false, malicious or mischievous allegation.

11. Raising a Concern Externally

This policy is intended to provide a route for concerns to be raised internally in the first instance. However, if you are unhappy with the outcome of an investigation, or do not feel comfortable raising a concern internally, you are free to raise it with a prescribed person or body, or with your Member of Parliament.

The full list of prescribed persons and bodies is available on the UK Government website:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>.

These include HM Revenue & Customs, the Comptroller and Auditor General, the Director of the Serious Fraud Office, the Charity Commission for England and Wales, the Information Commissioner, the Equality and Human Rights Commission, the Health and Safety Executive, the Care Quality Commission, and the Environment Agency.

The Fair Work Agency can also be contacted directly: <https://www.gov.uk/government/organisations/fair-work-agency>.

12. Support for Whistleblowers

If you are ever unsure whether to use this policy, or would like free, independent and confidential advice before raising a concern, the following external services can help:

Protect — the UK's whistleblowing charity, offering free, expert and confidential legal advice on how to raise a concern: <https://protect-advice.org.uk> (telephone 020 3117 2520).

UK Government guidance on whistleblowing for employees: <https://www.gov.uk/whistleblowing>.

Acas guidance on whistleblowing at work: <https://www.acas.org.uk/whistleblowing-at-work>.

13. Monitoring and Review

This policy will be reviewed annually and following any significant legislative or organisational changes.

14. Policy Approval

Approved by the Board of Directors.

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