Whistleblowing Policy 2026

Revised 30 September 2026

Version 2.0

Review September 2027

Policy owner: Rosie Aylward

1 Purpose and scope

Compass Learning & Education encourages staff to report suspected wrongdoing promptly so that children, young people and others are protected. Concerns will be taken seriously, assessed fairly and acted on without retaliation. This policy explains how to report internally or externally and what happens next.

The policy applies to all Compass staff, including employees, agency workers, self-employed tutors, mentors, therapists, consultants, contractors, volunteers and people on placement. Former staff may also raise concerns. It covers work in homes, schools, community venues, centres and online, including commissioned services and concerns involving partner organisations. Calling someone 'staff' in this policy does not determine their employment status.

All North West LADO contacts can be found in Appendix A at the end of this policy.

2 Framework and related procedures

Compass adopts the relevant safeguarding expectations of Keeping Children Safe in Education 2026, including its whistleblowing and staff-allegation arrangements, and Working Together to Safeguard Children 2026. It observes the Employment Rights Act 1996 as amended, including by the Public Interest Disclosure Act 1998, and applicable safeguarding, equality, health and safety and data-protection law. School-specific statutory duties are not assumed to apply automatically to every Compass activity.

Read this policy alongside the Safeguarding and Child Protection Policy, Staff Code of Conduct, low-level concerns and allegations procedures, Safer Recruitment Policy, Grievance Policy, Complaints Policy and data-protection and retention arrangements. A report can require action under more than one procedure. Staff do not need to identify the correct policy or prove wrongdoing before reporting.

3 What staff should report

Whistleblowing involves disclosing information about suspected wrongdoing in the public interest. Relevant wrongdoing includes criminal offences, breaches of legal obligations, miscarriages of justice, dangers to health or safety, environmental damage, sexual harassment and deliberate concealment of these matters. Concerns may relate to past events, current practice or something likely to happen.

Compass examples include concealing abuse; ignoring missed sessions or safeguarding reports; bypassing recruitment checks; unsafe lone working; falsifying attendance, progress reports, qualifications or invoices; charging for undelivered provision; serious or systemic data breaches; discrimination; and unsafe therapeutic practice or misleading claims about professional competence. Staff may also raise poor safeguarding practice that needs correction even where the legal definition of a protected disclosure is not met.

A purely personal employment complaint normally follows the grievance procedure. However, a grievance or disciplinary matter may also reveal wider wrongdoing or safeguarding risks and must not be dismissed merely because it affects the reporter personally.

4 Safeguarding action comes first

If anyone is in immediate danger, call 999. Where a child may be suffering or at risk of harm, refer promptly to children's social care and, where appropriate, the police, following the Safeguarding and Child Protection Policy. Do not wait for a manager, a completed form, a whistleblowing acknowledgement or a LADO response before taking urgent protective action. A LADO referral does not replace a referral about the child's safety.

Inform the DSL as soon as it is safe and appropriate, unless the DSL is implicated or doing so could increase risk or prejudice an investigation. For learners aged 18 or over, use the relevant adult safeguarding arrangements where applicable; do not assume that the LADO is the adult safeguarding service.

5 Concerns about an adult working with children

Report concerns promptly to the Director unless she is implicated or there is another conflict of interest. The harm threshold includes allegations that a person has harmed or may have harmed a child; may have committed an offence against or related to a child; may pose a risk of harm to children; or has behaved in a way indicating that they may be unsuitable to work with children. Conduct outside work can be relevant.

Where an allegation may meet this threshold, contact the relevant LADO without delay and within one working day, or sooner where local procedures require. Seek LADO advice if the threshold is unclear. Preserve information and take immediate safety measures, but do not conduct substantive interviews or an internal investigation that could prejudice statutory enquiries before agreeing next steps with the LADO or police.

Concerns below the harm threshold must still be reported and recorded under Compass's low-level concerns procedure. Patterns or new information may require escalation. Whistleblowing applies additionally where staff believe concerns are being concealed, ignored or handled unsafely.

6 Reporting internally or about the Director

The normal internal recipient is Rosie Aylward, Director and DSL. Staff may speak to her, telephone using the number supplied at induction, or send a confidential written report using her Compass contact details. Current contact and safeguarding-cover details must be issued before deployment and remain accessible during assignments. Staff may request a private meeting or communication adjustment.

If the Director is implicated, unavailable when action is needed, or internal reporting is unsafe, use the appropriate external route in section 12 directly. Allegations about harm or suitability to work with children may be reported straight to the relevant LADO. Child protection failures may also be raised with the commissioning school or local authority safeguarding lead, or the NSPCC Whistleblowing Advice Line. Other wrongdoing goes to the body responsible for that subject.

Staff do not need the Director's permission and do not have to exhaust an internal process before reporting externally. No one who is the subject of a concern may investigate it, decide its outcome or control the confidential reporting channel for it. Where an independent Compass contact has been formally appointed, staff will receive their details; the absence of such a contact must never delay external reporting.

7 Information to provide

Explain what happened or may happen, who may be at risk, the people and organisations involved, relevant dates and locations, and why the concern matters. Distinguish what you observed from what others told you. Share relevant information already available to you and any earlier reports or responses. Indicate a safe way to contact you and any confidentiality concerns.

Reports may be verbal, written or anonymous. No special form, legal terminology or supporting proof is required. The recipient will make an accurate record of a verbal report and, where possible, offer the reporter an opportunity to check it. Do not investigate independently, confront the person concerned, access records without authority or copy unnecessary personal information. Preserve original records and follow instructions on secure sharing.

8 Assessment and investigation

The case handler will first assess urgency, safeguarding needs, conflicts of interest and the appropriate referral or investigation route. The Director normally arranges this. If she is implicated, Compass will arrange a competent independent case handler and secure records custodian, taking advice from the relevant authority and professional advisers. The Director will not determine the findings or review her own case. Direct external reporting remains available throughout.

For reports received by Compass, acknowledgement will normally be provided within two working days, where contact is possible. An initial update will normally be given within ten working days, explaining who is handling the matter, the planned approach, available support and the next update date. These are Compass service targets, not deadlines for urgent safeguarding action or guarantees about an external body's response.

An investigation will have a proportionate scope, an impartial investigator, agreed responsibilities and a record of evidence and decisions. Any police, social care or LADO direction about timing and information sharing will be followed. Relevant commissioners and professional regulators will be informed where necessary and lawful. The reporter and the person concerned will be treated fairly; raising a concern does not establish guilt.

The case handler will agree ongoing updates with the reporter, normally at least every ten working days while the matter remains open. If that is not possible, an explanation and revised update date will be given. At conclusion, the reporter will receive as much information as can lawfully be shared about the outcome and action taken. Confidential employment or third-party information may limit the detail provided.

9 Review and escalation

A reporter who believes a concern has been mishandled may ask for a review, explaining what remains unresolved. Compass will arrange a reviewer who was not responsible for the disputed decision and has no relevant conflict. The same acknowledgement and initial-update targets apply. An external report may be made at any time; staff should not wait for review where someone remains at risk. Use local safeguarding escalation procedures if the response of another agency does not address continuing risk.

Agreed actions will be allocated to named people, given completion dates and checked for effectiveness. Any required DBS or professional-regulator referral must be considered under the relevant safeguarding procedure; resignation or the end of an assignment does not remove an applicable referral duty.

10 Protection and support

Compass will not tolerate dismissal, threats, harassment, victimisation, withdrawal of sessions, reduced work allocations or other retaliation because someone raises a concern on reasonable grounds or makes a protected disclosure. This organisational commitment covers everyone within the policy's scope, regardless of their employment status. Retaliation will be addressed through the appropriate disciplinary or contractual process.

Statutory protection is separate. Under whistleblowing law, protection depends on the individual's eligibility and the legal conditions for a protected disclosure. These include a reasonable belief that the information tends to show qualifying wrongdoing and that disclosure is in the public interest, together with the requirements of the disclosure route used. Volunteers and some self-employed contractors do not automatically have statutory worker protection.

A disclosure to a prescribed person is not automatically protected: the relevant legal conditions include reasonable belief that the matter falls within that person's prescribed remit and that the information and allegations are substantially true. Different conditions apply to other external disclosures. Staff can seek advice from Acas, Protect, their trade union or a legal adviser. Compass's procedure does not restrict lawful reporting or legal rights.

A concern need not be proved correct to be protected. An unsubstantiated report, an honest mistake or an unfavourable view of management does not by itself justify disciplinary action. Knowingly providing false information or deliberately fabricating evidence may be addressed through a fair disciplinary or contractual process. This provision must not be used to deter legitimate concerns.

Report suspected retaliation promptly to an unimplicated case handler or use the external advice and reporting routes. Compass will assess the risk of further detriment and agree proportionate support. Staff may be accompanied at meetings by a colleague or trade union representative, subject to appropriate confidentiality and conflict arrangements, and may request reasonable communication or accessibility adjustments.

11 Confidentiality and records

Information will be shared only where necessary and lawful. Compass will protect the reporter's identity as far as reasonably possible, but cannot guarantee anonymity where disclosure is necessary for safeguarding, a fair investigation or legal proceedings. Where safe and lawful, the reporter will be informed before their identity is shared. Anonymous reports will be assessed on the information and risk presented; anonymity may limit investigation and feedback.

The authorised case handler will retain the report, dates, risk assessment, referrals, investigation steps, decisions and reasons, updates, outcome, review and action completion. Records will be held securely with restricted access, separately from routine personnel records where appropriate, in accordance with the retention schedule and applicable safeguarding requirements. If the Director is implicated, an independent custodian will control the case records; they must not sit solely in a mailbox or folder controlled by her.

Staff must avoid unnecessary discussion or circulation of case information. Confidentiality clauses do not prevent lawful whistleblowing, safeguarding reports, cooperation with authorities or seeking appropriate legal or trade union advice.

12 External reporting and independent advice

Choose the route that matches the concern. These services have different functions: an advice service, a commissioner and a regulator are not interchangeable. The list below does not mean that every disclosure to every recipient automatically receives statutory whistleblowing protection.

Immediate risk. Call 999. For a non-emergency police report, use 101. Guidance

Child protection and adult allegations. Contact children's social care for the child's safety and the relevant LADO for allegations about adults. See Appendix A and the placement contact sheet. Guidance

NSPCC Whistleblowing Advice Line. 0800 028 0285 • help@nspcc.org.uk. Advice about child protection failures or concerns about how an organisation handles safeguarding. Guidance

Commissioners and regulators. Use the commissioning school's safeguarding lead or the local authority commissioning or safeguarding lead. For regulatory concerns, choose the appropriate body, such as Ofsted, HSE, ICO or a relevant professional regulator, only within its remit. Compass's status does not mean that every activity is inspected by Ofsted. Guidance

Independent advice. Acas, Protect, a trade union or a legal adviser can advise on reporting routes and legal protection. Guidance

13 Responsibilities and review

The Director will maintain accessible reporting routes, arrange impartial handling, support reporters, monitor corrective action and ensure staff receive the policy and overview at induction. Staff must raise concerns promptly, record accurately and cooperate with lawful enquiries. Training and reminders will explain external reporting and conflicts of interest, with understanding confirmed at induction and annually.

The policy will be reviewed annually and earlier after relevant changes or lessons from a case. The North West directory will be checked at least termly and before a new locality is used. The placement contact sheet must identify children's social care, out-of-hours cover, the commissioning contact and the relevant LADO route. Material contact changes will be communicated promptly and both documents updated together.

14 Approval and staff acknowledgement

Approval authority: Director
Approved by: Rosie Aylward

Date: 30.09.26

Staff acknowledgement: I have read and understood the policy and know how to report a concern internally or externally.
Name: _____

Signature or electronic confirmation: _____
Date: _____

Source documents

Keeping Children Safe in Education 2026

Working Together to Safeguard Children 2026

Government whistleblowing guidance for employers

Acas whistleblowing at work

Official local authority and safeguarding partnership sources are linked alongside each directory entry. Links are live references; contact details may change between reviews.

Appendix A North West LADO directory

Greater Manchester first five authorities

This directory covers all 24 North West authorities responsible for children's services. A LADO handles allegations about adults working with children; it does not replace children's social care or the police. Call 999 in an emergency. Contacts and official routes checked 30 September 2026; check the linked guidance when making a referral.

Normally contact the LADO where the adult works or the incident occurred. For outreach, online or cross-boundary cases, explain the child's, adult's and employer's locations and ask the LADO to agree the lead authority and liaison. Do not delay while resolving boundaries. Refer without delay and within one working day, or sooner under local rules.

Local authority	Contact and referral route
Bolton	**LADO@bolton.gov.uk** Professional referrals and consultations must use the online portal. Email is for general or public enquiries only. Official contact and referral guidance
Bury	**lado@bury.gov.uk** Email a brief outline and contact details for advice. Use the current LADO referral form linked in the guidance. Official contact and referral guidance
Manchester	**LADO@manchester.gov.uk** Send the current LADO contact form using the instructions in the guidance. Official contact and referral guidance
Oldham	**0161 770 8870 • colette.morris@oldham.gov.uk** **0161 770 0008 • wendy.nicholls@oldham.gov.uk** Refer on the same working day using the current form. Published contacts: Colette Morris and Wendy Nicholls. Official contact and referral guidance
Rochdale	**lado@rochdale.gov.uk** Email the LADO to report a concern about an adult working with children. Official contact and referral guidance

Appendix A North West LADO directory continued

Greater Manchester remaining authorities

Local authority	Contact and referral route
Salford	**0161 603 4350** Use the Children's Portal for referrals. The Safeguarding Unit can provide advice by telephone. Official contact and referral guidance
Stockport	**stockport.lado@stockport.gov.uk** Use the online form for referrals and consultations. Email is for help completing the form, not an alternative referral route. Official contact and referral guidance
Tameside	**ladoreferrals@tameside.gov.uk** Complete and email the current LADO referral form. Official contact and referral guidance
Trafford	**Online referral form** Use the LADO referral form within one working day. Official contact and referral guidance
Wigan	**lado@wigan.gov.uk** Complete the initial consideration form and send it to the LADO. Official contact and referral guidance

Staff may contact the LADO directly where the Director is implicated or internal reporting is unsafe. Explain why the usual senior contact has not been informed. Do not wait for permission. Keep safeguarding referrals about the child and relevant commissioner notifications separate and prompt.

Appendix A North West LADO directory continued

Merseyside

Local authority	Contact and referral route
Knowsley	**ladoinbox@knowsley.gov.uk** Use the LADO allegation management referral form. Official contact and referral guidance
Liverpool	**lado@liverpool.gov.uk** **07716 702034 • 07841 727309** Use the current LADO referral form. Published telephone contacts: Catherine Ballans and Pauline Trubshaw. Official contact and referral guidance
Sefton	**0151 934 3783** **safeguardingunitadmin@sefton.gov.uk** Use the consultation form for initial advice or the referral form for an allegation. Share securely. Official contact and referral guidance
St Helens	**01744 671252** **sthelenslado@sthelens.gov.uk** Use the consultation or referral form as appropriate. Follow an emailed referral with a telephone call within one day. Official contact and referral guidance
Wirral	**safeguardingunit@wirral.gov.uk** Send the LADO referral form within one working day / 24 hours, following local guidance. Official contact and referral guidance

Appendix A North West LADO directory continued

Cheshire

Local authority	Contact and referral route
Cheshire East	**01270 685904** **LADO@cheshireeast.gov.uk** Use the secure portal or email the current form as directed by the council. Official contact and referral guidance
Cheshire West and Chester	**safeguardinglado@cheshirewestandchester.gov.uk** Complete the current referral form. The service operates a duty rota and does not publish a direct LADO telephone number. Official contact and referral guidance
Halton	**0151 511 7925** **safeguarding.adminteam@halton.gov.uk** **Copy to LADO@halton.gov.uk** Send the consultation form to the admin team and copy the LADO within 24 hours. The admin mailbox is covered Monday to Friday. Official contact and referral guidance
Warrington	**01925 442079** **LADO@warrington.gov.uk** Use the current LADO referral form. Official contact and referral guidance

Appendix A North West LADO directory continued

Lancashire and Cumbria

Local authority	Contact and referral route
Blackburn with Darwen	**01254 506915** **LADO@blackburn.gov.uk** Contact the LADO for advice and the current referral route. Contact source: council schools service safeguarding update, April to July 2026. Official contact and referral guidance
Blackpool	**01253 477541** **lado@blackpool.gov.uk** Use the referral form, or the consultation form if the threshold is unclear. Official contact and referral guidance
Lancashire	**lado.admin@lancashire.gov.uk** The online form is mandatory for referrals and advice requests. Email is for general contact only. Covers the county districts listed below. Official contact and referral guidance
Cumberland	**0300 303 3892** **lado@cumberland.gov.uk** Send the position of trust referral form securely, using the council's password-protection instructions. Official contact and referral guidance
Westmorland and Furness	**0300 303 3897** **lado@westmorlandandfurness.gov.uk** Use the position of trust referral form and secure email instructions. Official contact and referral guidance

Lancashire County Council covers Burnley, Chorley, Fylde, Hyndburn, Lancaster, Pendle, Preston, Ribble Valley, Rossendale, South Ribble, West Lancashire and Wyre. Blackburn with Darwen and Blackpool have separate services. Cumberland and Westmorland and Furness replace the former Cumbria county route.