



FAB Learning

Forming a new beginning through bespoke interventions.

Whistleblowing Policy (including responses to Low-Level Concerns)

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1. Introduction

This procedure outlines the types of concerns covered under the FAB Learning Interventions Whistleblowing Procedure, identifies appropriate procedures for reporting, and assures employees that raising a complaint will not result in adverse consequences. It also outlines support available to those who raise concerns that fall under the scope of the policy.

2. Purpose

Employees and those working within an organisation in various capacities are often the first to notice misconduct within an organisation, and are therefore most likely to raise concerns. However, they may hesitate to voice concerns due to fear of reprisal or repercussions within the workplace. This policy intends to promote a culture of openness and support by encouraging staff to report serious concerns responsibly through internal processes.

FAB Learning Interventions works closely alongside the local authority and various commissioners, all of which are committed to upholding high standards of integrity and accountability. Employees and affiliates who suspect malpractice are encouraged and expected to voice concerns without fear of victimisation, discrimination, or disadvantage.

This policy applies to all employees, contractors, and external staff and covers serious concerns in the organisation or related to public interest, such as suspected malpractice, unethical behavior, or violations of law.

3. Aims and Scope

The aim of the FAB Learning Interventions Whistleblowing Procedure is to:

- Empower employees to raise serious concerns with confidence.
- Offer clear channels for reporting and feedback.
- Assure protection against reprisals for disclosures made in good faith.

Concerns Covered

This procedure is intended for issues beyond routine employment matters or complaints better addressed through raising a grievance to an allocated line-manager. Examples of issues covered in this policy include:

- Criminal offenses or legal breaches.
- Fraud, corruption, or misuse of public funds.
- Health and safety risks.
- Environmental damage.
- Miscarriages of justice.



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- Unethical conduct, including institutional racism or efforts to conceal wrongdoing.

Concerns related to safeguarding should be escalated through the appropriate procedures, such as the Safeguarding or Child Protection processes outlined in the FAB Learning Safeguarding Policy and Child Protection Policy. These policies are available on the FAB Learning Interventions company website: fab-learning.co.uk

4. Support for those Raising Concerns

- **Protection Against Retaliation:** Employees raising concerns in good faith are shielded from victimisation or disadvantage.
- **Confidentiality:** Every effort will be made to maintain confidentiality, although anonymity may limit the ability to investigate fully.
- **Support:** Investigations will not influence unrelated disciplinary or redundancy actions, and employees will be updated on the progress of their concerns within legal constraints. Those raising concerns may be accompanied by a trade union, professional/association representative or a work colleague during any meetings or interviews that are related to the concern raised.

5. Reporting Guidelines

Procedure for Raising a Concern

1. **Initial Reporting:** Concerns should typically be raised with an immediate manager unless circumstances necessitate escalation. For issues involving:
 - **Company matters:** Report to the Monitoring Officer (Claire Bishop, Chloe Argent-Duncan, Michele Fowler or designated line-manager) .
 - **Local Authority matters:** Report to the Monitoring Officer (LADO) or escalate to the Chief Finance Officer if necessary.
 - **Third parties (e.g., contractors):** Report to their employer or a director.
2. **Written Concerns:** Include key details such as:
 - Background and history of the issue (dates, names, events).
 - Reason for concern and why it qualifies as a whistleblowing matter.
3. **Collaboration:** Consider consulting a colleague or representative for support, ensuring confidentiality.
4. **Evidence:** While proof is not required, reasonable grounds and supporting documentation strengthen the case and support .
5. **External Reporting:** In some cases, concerns may also be reported to regulatory bodies or the police, particularly where legal violations are evident.

Low Level Concerns

A low-level concern is a concern about a child or adult at risk that doesn't meet the harm threshold and can be escalated by professionals to their appropriate line-manager Low-level concerns can include, but are not limited to:



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- Inappropriate behavior, including outside of work
- Being over friendly with learners
- Having favourites
- Taking photographs of learners on a personal mobile phone or for personal use
- Engaging with a child on a one-to-one basis in a secluded area
- Humiliating a learner

(NSPCC, 2024)

The Company Directors will decide an appropriate response in respect of all low-level concerns, although depending on the nature of some low-level concerns, the principal may wish to consult with the Snr DSL and take a more collaborative decision-making approach.

Low-level concerns which are shared about supply staff and contractors are reported to their employers, so that actions can be taken, and any potential patterns of inappropriate behaviour can be identified.

Where a pattern of concern or problematic behaviour is identified, or where the behaviour moves from a low-level concern to meeting the harm threshold, a referral to the LADO will be made.

Further information for professionals about what comprises a 'low level concern' can be found on the NSPCC website: [NSPCC Responding to Low Level Concerns](#)

6. Investigative Response

1. **Acknowledgment:** Acknowledgment of the concern will be provided within 10 working days, along with a proposed course of action and estimated timelines.
2. **Action Taken:** Investigations may include internal audits, referrals to external authorities, or independent inquiries.
3. **Outcome Notification:** Employees will be informed of outcomes, subject to legal and confidentiality constraints.
4. **Support in Proceedings:** The organisation will assist employees required to give evidence in disciplinary or legal proceedings.

7. Concerns Involving the Local Authority

Within ten working days of raising a concern, the recipient of your complaint (e.g., your line manager, the Monitoring Officer, or their representative) will respond in writing to:

- Acknowledge receipt of your concern.
- Explain the proposed steps to address the matter.



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- Provide an estimated timeline for a final response.
- Share whether initial inquiries have been made.
- Offer information about available colleague support mechanisms.
- Indicate if further investigations will occur and, if not, explain why.

Depending on the circumstances, the concern may:

- Be investigated by management, a trained investigator, internal audit, or another appropriate procedure.
- Be referred to the police.
- Be referred to the external auditor.
- Be the subject of an independent inquiry.

Initial inquiries carried out by the Company will determine whether an investigation is appropriate and, if so, its scope and form, as well as contact with the LADO. While prioritising public interest, the Directors/Local Authority will also consider their duty of care to employees and ensuring their overall health and wellbeing. Concerns that fall under specific procedures (e.g., child protection or discrimination) will typically be handled through those mechanisms with reference to the local authority. Some issues may be resolved through agreed-upon actions without the need for investigation, depending on the circumstances. Urgent matters will be addressed immediately, even before investigations begin.

The degree of contact between you and the officers handling your concern will depend on the complexity of the issue, potential challenges, and the clarity of your initial information. Additional information may be sought, and efforts will be made to keep you informed, subject to legal constraints. If a meeting is arranged, it can be held off-site if preferred, and you may bring a union representative, professional association representative, or work colleague for support.

The Company/Local Authority will take steps to minimise any difficulties you face as a result of raising a concern and will always consider their duty of care for employees and minimising stress/anxiety related to various proceedings. For example, if you need to give evidence in criminal or disciplinary proceedings, advice about the procedure will be provided and support allocated through the Company.

The Company recognises your need for assurance that the issue has been addressed appropriately. Therefore, subject to legal constraints, your line manager, the Monitoring Officer, or their representative will inform you of the investigation's outcome once the case is concluded.

8. Anonymous and Malicious Allegations

- **Anonymous Reports:** Anonymous concerns will be assessed based on their seriousness, credibility, and feasibility for investigation.
- **Malicious Allegations:** Deliberately false or frivolous complaints may result in disciplinary action.

9. Escalation

If dissatisfaction arises from the organisation's response, concerns may be directed to external bodies, such as:

- **Public Concern at Work (Protect):** A charity providing confidential advice on malpractice reporting.
 - Website: www.pcaw.co.uk
 - Phone: 020 7404 6609
- **Other Authorities:** Regulatory bodies, professional organizations, or the police, provided legal thresholds are met.

Employees are reminded to avoid disclosing confidential information unnecessarily when escalating concerns externally.

9. Final Notes

This Whistleblowing Procedure is a framework for ensuring integrity and accountability while protecting and supporting those who report misconduct. For further guidance, consult the NSPCC Whistleblowing Advice Line:

- Phone: 0800 028 0285
- Email: help@NSPCC.org.uk

7. The NSPCC Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation. NSPCC can be contacted by dialing tel:0800 028 0285 or emailing help@NSPCC.org.uk