

Whistleblowing Policy

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Amendment Register

Date Amended	
Amendments	

Policy Overview

We are committed to conducting our business with honesty and integrity, and we expect all tutors to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The Whistleblowing Policy and Procedures document sets out the framework for dealing with allegations of illegal and improper conduct. SENSational Tutors are committed to the highest standards of transparency, integrity and accountability. This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

The purpose of this policy is:

- To encourage self-employed tutors, professionals, employees and subcontractors to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide tutors with guidance as to how to raise those concerns.
- To reassure tutors that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This procedure is intended to ensure that SENSational Tutors complies with its duty under the Public Interest Disclosure Act 1998. Furthermore, the Company is committed to compliance with the Bribery Act 2010. SENSational Tutors therefore actively encourages a culture of honesty and openness, and all stakeholders are required to make the Director aware of any issue that, in their opinion, might constitute bribery or corruption.

All stakeholders (including tutors) are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

Stakeholders are invited to comment on this policy and suggest ways in which it might be improved.

Comments, suggestions and queries should be addressed to Joanna Gibbs.

Scope

This procedure applies to, but is not limited to, allegations about any of the following:

- Criminal activity
- Failure to comply with any legal obligation or regulatory requirements
- Damage to the environment
- Bribery
- Tax evasion
- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorized use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of stakeholders, customers or service users
- Abuse of authority
- The deliberate concealment of any of the above matters
- Other unethical conduct

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

If you are uncertain whether something is within the scope of this policy, you should seek advice from Joanna Gibbs.

Disclosure Procedure

Information which a stakeholder reasonably believes tends to show one or more of the above allegations should promptly be disclosed to Joanna Gibbs (Founder & Director) so that any appropriate action can be taken.

If it is inappropriate to make such a disclosure to Joanna Gibbs, the stakeholder should speak to Rebecca Tinworth (Commissioning Officer).

Stakeholders will suffer no detriment of any sort for making such a disclosure in accordance with this procedure. However, if we conclude that an individual has made false allegations maliciously, they may be subject to disciplinary action.

Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

Action on receipt of an Allegation

The Company Director, or an investigator commissioned by the Company Director, will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation
- The acknowledgement of the allegation
- Any documents supplied by the whistleblower

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If the allegation relates to fraud, potential fraud or other financial irregularity the Company Director will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence, it will immediately be reported to the Police. If the allegation concerns suspected harm to children, the appropriate authorities will be informed immediately.

Timetable

An acknowledge of the allegation in writing within 10 working days with:

- An indication of how SENSational Tutors propose to deal with the matter.
- An estimate of how long it will take to provide a final response.
- An indication of whether any initial enquiries have been made.
- Information on whistleblower support mechanisms
- Indication whether further investigations will take place and if not, why not.

For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, please speak in confidence to Joanna Gibbs.

Confidentiality and protection of whistleblowers

All allegations will be treated in confidence, and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. However, if the matter subsequently results in court proceedings, then the whistleblower may have to give evidence in open court if the case is to be successful.

SENSational Tutors will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes termination of contract, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform Joanna Gibbs or Rebecca Tinworth immediately.

You must not threaten or retaliate against whistleblowers in any way. In some cases, the whistleblower could have a right to sue you personally for compensation.

Anonymous Allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Despite this, anonymous allegations will be considered at the discretion of the Company Director. In exercising discretion to accept an anonymous allegation the following factors will be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation
- Whether the allegation can realistically be investigated from factors or sources other than the complainant.

You should be aware that Whistleblowers who are concerned about possible reprisals if their identity is revealed, should come forward to Joanna Gibbs or Rebecca Tinworth and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline.

☎ 020 3117 2520 (option 1)

✉ whistle@protect-advice.org.uk

Responsibility for the Procedure

The company director has overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

Monitoring

A Register will record the following details:

- The name and status of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Company Director.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within SENSational Tutors Ltd. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Tutor concerns

Although this policy is specifically aimed at teachers/tutors who provide tuition facilitated through SENSational Tutors, we strongly encourage teachers/tutors to raise any concerns they have about a student by following the procedures outlined in SENSational Tutors's Safeguarding Children & Young Adults Policy and Procedure. If in any doubt, please contact Joanna Gibbs.

In an emergency where immediate action is necessary to ensure a student's safety, please call the police on 999.