



RESPECT. RESILIENCE. INTEGRITY.

Whistleblowing Policy

DATE APPROVED

24 September 2026

NEXT DOCUMENT REVIEW

July 2027

Policy Owner:	Sam Gray, Headteacher
Confirmed by	Life Changing Education Ltd, acting through Krystian Liptrot, Chair of the proprietor board and company
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Next document review	July 2027 (governors advise; proprietor decides)
Applies to:	All employees and other adults working for or on behalf of LCE Academy at Unit 4, Howarth Court, Oldham Gateway, Gateway Crescent, Chadderton, Oldham, OL9 9XB.

LCE ACADEMY

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1 Purpose

This policy gives workers and other adults a safe route to disclose suspected wrongdoing in the public interest. It supports early reporting, independent handling and protection from detriment. No person is required to exhaust an internal route before taking urgent safeguarding action or seeking independent advice.

2 Legal and regulatory framework

- Employment Rights Act 1996 and Public Interest Disclosure Act 1998.
- Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.
- Education (Independent School Standards) Regulations 2014.
- Data Protection Act 2018 and UK GDPR.

Legal protection depends on the facts and the statutory conditions for a qualifying protected disclosure. Nothing in this policy limits those rights. Staff may seek independent advice from their trade union or Protect. Volunteers and some contractors may fall outside statutory worker protection, but the Academy applies the same no-retaliation standard to anyone who raises a concern responsibly.

3 Scope and related routes

A whistleblowing disclosure may concern:

- a safeguarding failure, unsafe practice or concealment of risk to pupils;
- a criminal offence, fraud, financial malpractice or misuse of public or organisational funds;
- a breach of legal duty, regulatory standard or health and safety requirement;
- serious misconduct, discrimination, corruption or abuse of authority;
- damage to the environment; or
- deliberate concealment of any of these matters.

A personal employment complaint normally follows the Grievance Procedure. A concern about an adult who may have harmed a child follows the safeguarding allegation route. A complaint from a parent follows the Complaints Policy. The receiving officer chooses the procedure by substance rather than label, records the decision and ensures urgent protective action is not delayed.

4 Reporting routes

Circumstance	Route
Ordinary internal concern	Raise with a line manager or Sam Gray, Headteacher, verbally or in writing.
Concern about Sam Gray or a conflict at Headteacher level	Raise with Krystian Liptrot, Chair of the proprietor board and company.
Concern about Krystian Liptrot or a conflict at proprietor level	Raise with Mark Giles, Chair of the advisory governing body, or Rob McGinty, Chief Education Officer, as an independent receiving officer, and use the appropriate external route. The subject of the concern must not control the response.
Child at immediate risk	Call 999. Contact Oldham MASH on 0161 770 7777; out of hours 0161 770 6936.
Allegation about an adult working with children	Use the Oldham LADO referral route on the same working day where the harm threshold may be met or advice is needed.
Safeguarding practice cannot safely be raised internally	NSPCC Whistleblowing Advice Line: 0800 028 0285 or help@nspcc.org.uk .
Regulatory or other wrongdoing	Report to the regulator or prescribed person responsible for that subject, or use the DfE online wrongdoing route. Independent advice should be taken where legal protection is important.

Current internal contact details are maintained in the staff safeguarding quick guide and induction pack. External contact details are checked at each policy review and before publication. A person may go directly to police, children's social care, the LADO, NSPCC, DfE or another appropriate authority where the concern is urgent, internal disclosure is unsafe or ineffective, or the law permits external disclosure.

5 How to raise a concern

A disclosure may be verbal or written. The reporter should provide as much factual information as they can, including what is believed to be wrong, who is involved, dates or patterns, available evidence, immediate risk and whether the matter has been raised before. A reporter is not expected to prove the case and must not investigate, obtain information unlawfully or place themselves or another person at risk.

Anonymous concerns are considered according to seriousness, specificity, credibility, available evidence and safeguarding risk. Anonymity may limit clarification and feedback but does not justify ignoring a credible concern.

6 Immediate response and triage

- 1 The recipient makes anyone at immediate risk safe and refers urgent safeguarding, criminal or health and safety matters without delay.
- 2 The recipient records the disclosure securely, preserves evidence and confirms receipt as soon as practicable, normally within two working days where contact details are available.
- 3 A conflict check identifies a case manager who is not implicated. Where independence cannot be achieved internally, an external investigator or receiving authority is appointed or contacted.
- 4 The case manager decides which procedure and external notifications apply. The reporter is told the route, expected next step and support available, subject to lawful confidentiality.
- 5 An initial meeting or written clarification is offered promptly, normally within five working days for a non-urgent concern. Delay and revised timescales are explained and recorded.

7 Investigation and outcome

The investigation is proportionate to risk, complexity and any direction from police, children's social care, LADO or another regulator. The investigator has suitable competence and no prior involvement that would compromise fairness. Terms of reference identify the issue, evidence, witnesses, confidentiality, timescale and reporting line. The subject is treated fairly, but disclosure to them is delayed where this is necessary to protect a child, a witness or an external investigation.

The reporter receives a progress update at reasonable intervals and a proportionate outcome when the case closes. Confidential pupil, personnel or legal information is not disclosed. Possible outcomes include no further action, corrective action, policy or control change, disciplinary or capability action, financial recovery, safeguarding action and referral to police, LADO, DBS, Teaching Regulation Agency, DfE, HSE or another appropriate body. The decision and rationale are recorded.

8 Confidentiality and protection from detriment

The Academy protects the reporter's identity as far as lawful and practicable and shares information only with people who need it. Absolute confidentiality cannot be promised where safeguarding, fair process or law requires disclosure. The reporter is consulted before identity is disclosed where possible.

Victimisation, dismissal, disadvantage, threat or harassment because a person raised a qualifying concern is prohibited and may lead to disciplinary action. A concern that is mistaken or not upheld does not by itself justify action against the reporter. Deliberately making information known to be false may be addressed under the disciplinary procedure after a fair investigation; this safeguard must not be used to discourage genuine reporting.

Records and data protection

Whistleblowing records are kept in a secure, access-controlled case file separate from routine personnel and pupil records. The file contains the original concern, chronology, evidence, conflict check, safeguarding and regulatory decisions, investigation plan, communications, outcome, referrals and action closure. CPOMS contains only safeguarding information relevant to an identifiable pupil and is not the whistleblowing or personnel case file. Records are retained under the Academy retention schedule and any applicable legal or regulatory requirement.

Oversight and learning

Krystian Liptrot receives anonymised termly assurance on the number and broad nature of cases, timeliness, independence, referrals, actions and themes unless he is the subject of a concern. In that circumstance, Mark Giles and Rob McGinty coordinate appropriate independent oversight and external reporting without giving the subject control over evidence or outcome. Reports protect the identities of the reporter, pupils and subject unless disclosure is lawfully required.

The Academy tests staff knowledge of routes at induction and at least annually. Learning from cases informs training, supervision, risk assessment and policy. This policy is reviewed annually in July and after a serious case, statutory change or identified weakness. The next scheduled document review is July 2027.



Authoritative sources

GOV.UK: Whistleblowing for employees: <https://www.gov.uk/whistleblowing>

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

DfE: Keeping Children Safe in Education 2026: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

DfE online contact and wrongdoing route: <https://www.gov.uk/contact-dfe>