

SPM Development Services Ltd

Whistleblowing Policy

Reviewed and Updated: September 2026

Next Review: September 2027, or sooner if statutory guidance changes.

Approved by: Simon Piper-Masha

Purpose

SPM Development Services Ltd encourages anyone working on its behalf to raise concerns about wrongdoing, unsafe practice or safeguarding failures. This policy explains how concerns can be raised and how SPM will respond.

Whistleblowing is the reporting of wrongdoing that the person reasonably believes is in the public interest. It is different from a personal complaint or grievance about an individual's own treatment, which should normally be addressed through SPM's Complaints Policy and Procedure.

Scope

This policy applies to staff, self-employed tutors, mentors, contractors and volunteers working on behalf of SPM. SPM will take all concerns seriously and will not tolerate victimisation or retaliation against anyone who raises a genuine concern.

Statutory whistleblowing protection depends on the individual's legal employment status and whether the disclosure meets the requirements of the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998. SPM's internal commitment to fair treatment applies regardless of whether the person qualifies for statutory protection.

What to Report

Concerns may relate to past, current or likely future wrongdoing, including:

- A criminal offence, fraud or financial misconduct.
- A breach of a legal obligation.
- A miscarriage of justice.
- Danger to health and safety.
- Damage to the environment.
- Sexual harassment.

- Safeguarding failures, unsafe practice or risks to children and young people.
- Malpractice or maladministration affecting assessment or qualifications.
- Deliberate concealment of information about any of the above.

How to Report

- Concerns should normally be raised as soon as possible with SPM's Designated Safeguarding Lead (DSL) or Head of Centre using the contact details provided in the Safeguarding and Child Protection Policy.
- Concerns may be raised verbally or in writing. The person should provide as much factual information as possible but is not expected to prove the concern before reporting it.
- If the concern involves the DSL or Head of Centre, cannot reasonably be raised internally, or is not being addressed, a safeguarding concern may be reported to the relevant commissioning local authority, children's social care or the Local Authority Designated Officer where appropriate.
- Anyone concerned about how child protection concerns are being handled may contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or at help@nspcc.org.uk.
- Other whistleblowing concerns may be raised with an appropriate prescribed person or regulator. Independent legal advice may be sought where needed.
- Anonymous concerns will be considered where sufficient information is available, although anonymity may limit SPM's ability to investigate or provide feedback.

Protection for Whistleblowers

SPM will not tolerate victimisation, retaliation or disadvantage against anyone who raises a concern that they reasonably believe to be true and in the public interest, even if the concern is not ultimately substantiated.

The identity of the person raising the concern will be protected as far as reasonably possible. Complete confidentiality cannot be guaranteed where information must be shared to protect a child, comply with the law or allow a fair investigation.

Knowingly making a false or malicious allegation is not protected under this policy and may result in appropriate action.

Responding to Concerns

SPM will assess concerns promptly and take immediate safeguarding action where required. The matter may be investigated internally or referred to the relevant local authority, awarding organisation, regulator or police.

Any investigation will be handled fairly and by a suitably competent person with no conflict of interest. The person who raised the concern will be given appropriate feedback where possible, although confidentiality may limit the information that can be shared.

A secure record will be kept of the concern, action taken and outcome.

Policy Review

This policy will be reviewed annually, or sooner if statutory guidance changes.