



WHISTLEBLOWING POLICY

Ember Learning Ltd

Document Reference:	EL-WBP-001
Date Adopted:	1 September 2026
Status:	Adopted

1. PURPOSE AND SCOPE

Ember Learning Ltd, is committed to operating with integrity and to creating an environment in which concerns about wrongdoing — including safeguarding failures, illegal activity, and serious risks to children and adults at risk — can be raised safely, promptly, and without fear of retaliation.

This Policy applies to:

- All Company directors
- All self-employed teachers, mentors, and associates engaged by Ember Learning Ltd
- Any other person working in connection with Ember Learning who becomes aware of a concern

Whistleblowing (also known as 'making a protected disclosure') is the act of reporting a concern about wrongdoing, danger, or illegality in the public interest. This Policy sets out how to raise such concerns and how they will be handled.

2. WHAT WHISTLEBLOWING COVERS

This Policy covers concerns about matters that affect others or that are in the public interest — not personal employment disputes, which should be raised through the Complaints Procedure (EL-CP-001). Whistleblowing concerns include:

- A safeguarding failure or risk of harm to a child or adult at risk that has not been properly addressed
- Illegal activity by any person associated with Ember Learning
- A serious breach of any Ember Learning policy that puts children or adults at risk
- Unsafe or dishonest conduct that the person raising the concern reasonably believes to be in the public interest to disclose

- Concealment or covering up of any of the above

A concern does not need to be proven before it is raised. This Policy is for reporting reasonable, good-faith concerns — not for making allegations that the individual knows to be false.

3. HOW TO RAISE A CONCERN INTERNALLY

3.1 In most cases, concerns should be raised with the Company Director:

Role	Name	Contact
Primary contact — Company Director	Jack Bradley	jack@emberlearning.co.uk
Alternative contact — Company Director	Mahesh De Zoysa	mahesh@emberlearning.co.uk

3.2 If the concern relates to the conduct of a Company Director, the concern should be raised with another director who is not implicated, or directly with an external body as described in Section 4.

3.3 Where the concern involves a safeguarding risk to a child or adult at risk, it should also be raised with the Designated Safeguarding Lead (Jack Bradley) or, if the concern involves the DSL, directly with the Deputy DSL (Mahesh De Zoysa) or with an external body as described in Section 4.

3.4 Concerns may be raised verbally or in writing. Written disclosure is preferred where practicable, as it ensures an accurate record. The person raising the concern should describe: what they have observed or been told; when and where it occurred; who was involved; and what action (if any) has already been taken.

4. EXTERNAL REPORTING CHANNELS

Where a concern cannot be raised internally, or where internal concerns have not been appropriately addressed, the following external channels are available:

5. HOW CONCERNS WILL BE HANDLED

Organisation	Contact / Purpose
NSPCC Whistleblowing Advice Line	0800 028 0285 — for concerns about child safeguarding
Local Authority Designated Officer (LADO)	Contact the relevant LADO for the area in which the concern arises — for allegations against adults working with children. For concerns about adults at risk aged 18 or over, contact adult social care under the Care for the Local Authority area in which the concern arises - for concerns about adults at risk aged 18 and over, under the Care

	Act 2014Act 2014
Ofsted	0300 123 4666 — for concerns about regulated activity with children
Department for Education	Via the DfE's online referral route — for serious concerns about alternative provision
Information Commissioner's Office (ICO)	0303 123 1113 — for data protection concerns
Health and Safety Executive (HSE)	0300 003 1647 — for health and safety concerns

5.1 All concerns raised in good faith under this Policy will be taken seriously and acknowledged promptly.

5.2 The Company will investigate concerns raised internally in a manner proportionate to their seriousness. The investigation may be conducted by a director, or — where the concern is serious or involves a director — by an independent external person.

5.3 The person raising the concern will be kept informed of progress and, where possible, of the outcome. There may be circumstances in which full feedback cannot be provided due to confidentiality obligations in relation to other individuals.

5.4 Concerns involving a safeguarding risk to a child or adult at risk will be referred to the relevant statutory authority without delay, in accordance with the Child Protection and Safeguarding Policy (EL-CPSP-001).

6. CONFIDENTIALITY

Ember Learning will make every reasonable effort to protect the confidentiality of the person raising a concern. However, there may be circumstances in which disclosure of identity is unavoidable — for example, where a concern leads to formal legal proceedings. The person raising the concern will be informed if this is likely to be the case.

Concerns may be raised anonymously. Anonymous concerns will be considered and investigated where possible, taking into account the nature and seriousness of the concern and the information provided.

7. PROTECTION FROM RETALIATION

Ember Learning Ltd will not subject any person to retaliation — including termination of engagement, disadvantage in session allocation, or any other detriment — as a result of raising a concern in good faith under this Policy.

Any person who believes they have been subjected to retaliation for raising a concern should report this immediately to a Company Director or to one of the external bodies listed in Section 4.

This Policy does not protect individuals who make disclosures they know to be false or who raise concerns in bad

Ember Learning recognises that raising a concern, particularly about a colleague who is more senior, more experienced, or has worked with the Company for longer, can feel intimidating, and that poor practice can become normalised within a small team to the point where it feels difficult to challenge. Neither of these is a reason not to report. Associates are encouraged to raise a concern even where it involves someone in a position of seniority or trust, or where the practice concerned is longstanding or widely accepted within the team and faith.

8. LEGAL PROTECTION

Self-employed contractors may have limited protection under the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). Individuals who are uncertain about their legal position are encouraged to seek independent advice, including from the whistleblowing charity Protect (formerly Public Concern at Work): 020 3117 2520.

9. REVIEW

This Policy will be reviewed annually by the Company Directors and following any whistleblowing incident, material change in legislation, or change in the nature of the Company's operations.

Policy Owner:	Jack Bradley, Director & Designated Safeguarding Lead
Date Adopted:	1 September 2026
Next Review Due:	1 September 2027 (or earlier if a trigger event occurs)
Approved by:	Jack Bradley, Director, 1 September 2026