Thallo
ALTERNATIVE PROVISION

Whistleblowing Policy

Thallo Education Ltd.

VERSION: 1.0
DATE: 25th September 2026
AUTHOR: May MacKay-Morris

Policy Lead	May MacKay-Morris Provision Lead / Director
Approved By	May MacKay-Morris - Director
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Review Date	September 2027 Or sooner, following relevant change.

1. Aim and purpose

Thallo Alternative Provision is committed to conducting its work with honesty, integrity, openness and accountability. We want people working for or with Thallo to feel able to raise serious concerns about wrongdoing, unsafe practice or failures to safeguard children without fear of retaliation.

This policy explains how concerns may be raised, how Thallo will respond, and the protections that may apply to a qualifying disclosure. It supports, but does not replace, Thallo's safeguarding, allegations against adults, low-level concerns, complaints and grievance procedures.

2. Who this policy applies to

This policy applies internally to employees and workers and is also available as a reporting route to agency staff, sessional practitioners, contractors, volunteers, trainees and other adults working for or on behalf of Thallo.

Statutory whistleblowing protection depends on the individual's legal status and the circumstances of the disclosure. Some people, including genuinely self-employed people and volunteers without an enforceable employment contract, may not fall within the statutory whistleblowing protection. Thallo will nevertheless take concerns raised by them seriously and will not tolerate retaliation for raising a genuine safeguarding, safety or public-interest concern.

3. What is whistleblowing?

Whistleblowing is the disclosure of information which a worker reasonably believes tends to show specified wrongdoing and which they reasonably believe is in the public interest. A legally protected disclosure is commonly referred to as a "protected disclosure".

Qualifying wrongdoing may include:

- a criminal offence;
- a breach of a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any person;
- damage to the environment;
- sexual harassment;
- deliberate concealment of information tending to show any of the above.

A concern may relate to something that happened in the past, is happening now or is likely to happen. A worker does not need to prove the wrongdoing before raising a concern, but must have the reasonable belief required by law for statutory protection.

4. Whistleblowing, safeguarding and personal grievances

A concern about the safety or welfare of a child must be acted on immediately in accordance with Thallo's Safeguarding and Child Protection Policy. Staff must not wait for a whistleblowing investigation where a child may be at risk.

Concerns about the conduct of an adult working with children must also be considered under Thallo's procedures for allegations and low-level concerns. Where the concern meets the threshold for referral to the Local Authority Designated Officer (LADO), that process takes priority and will not be delayed by an internal investigation.

A personal complaint about an individual's own employment situation will normally be dealt with through the appropriate grievance or employment procedure unless the matter also amounts to a public-interest disclosure.

5. Protection from detriment

Thallo will not subject a worker to dismissal, disadvantage, loss of work or opportunity, threats, bullying, harassment or other detriment because they have made a protected disclosure.

A confidentiality or contractual provision will not be used to prevent a person from making a protected disclosure where the law protects that disclosure.

No person should retaliate against, victimise or attempt to silence somebody who raises a genuine concern under this policy. Any such behaviour may itself be treated as a serious conduct or safeguarding matter.

6. How to raise a concern

Concerns should be raised as soon as reasonably possible. The primary internal contact is:

Provision Lead / Director: May MacKay-Morris | may@thalloeducation.co.uk | 07811143355

If the concern relates to the Provision Lead / Director, or the person raising it reasonably believes it cannot appropriately be raised with them, it should be raised with:

Alternative internal contact: where the concern is about the Provision Lead / Director and no suitable independent internal contact has been designated, the concern may be raised through the relevant safeguarding, regulatory or commissioning route described in this policy.

For services commissioned under Suffolk County Council's CD1397 Alternative Education Rolling Select List, Thallo recognises the Council's Authorised Representative as an authorised person to whom staff may make a qualifying disclosure in accordance with the contractual arrangements.

Suffolk County Council Authorised Representative: the Head of SEND Funding and Provider Services and the Provider Development and Performance Manager, or such other person appointed by the Council under the Agreement. Current contact arrangements notified by the Council should be used rather than relying on a named individual in this policy.

Concerns may be raised verbally or in writing. A person raising a concern should provide as much factual information as they reasonably can, including what happened, when and where it happened, who was involved, why they are concerned and any relevant documents or evidence. Lack of documentary evidence should not prevent a concern from being raised.

7. Confidentiality and anonymous concerns

Thallo will respect a person's wish for confidentiality as far as reasonably possible. Information will be shared only where necessary to assess or investigate the concern, safeguard a child or another person, comply with the law, obtain specialist advice or meet a contractual or regulatory duty.

Anonymous concerns will be considered, although anonymity may make it harder to investigate, seek clarification or provide feedback. A person who wants their identity kept confidential should say so when raising the concern.

8. How Thallo will respond

The person receiving the concern will make an initial assessment promptly. The response will depend on the nature and seriousness of the information and may include safeguarding action, referral to the LADO or another authority, an internal investigation, an external or independent investigation, a health and safety response, data-protection action or referral to another appropriate procedure.

Where appropriate, Thallo will acknowledge the concern, identify who is handling it and keep the person who raised it informed of progress. The amount of information that can be shared about an investigation or outcome may be limited by confidentiality, safeguarding, data-protection or employment obligations.

Investigations will be conducted fairly, proportionately and without avoidable delay. Records of the concern, decisions, actions and outcomes will be kept securely and access will be restricted to those who need the information.

9. External disclosures and prescribed persons

A worker may make a disclosure outside Thallo where the legal requirements for protection are met. This may include disclosure to a relevant "prescribed person" or body whose remit covers the subject of the concern.

Examples may include the Health and Safety Executive, the Information Commissioner's Office, HM Revenue & Customs or another regulator, depending on the subject matter. The current government list of prescribed persons and bodies should be checked before making an external disclosure because the correct body depends on the issue being reported.

A worker may also seek independent legal advice or advice from Acas, a trade union or an independent whistleblowing advice service. Disclosures to the media, social media or other third parties are subject to more demanding statutory conditions and may not attract whistleblowing protection.

10. Deliberately false or malicious allegations

A person will not be penalised simply because a genuine concern turns out to be mistaken or is not substantiated. The focus is on whether the concern was raised with the relevant reasonable belief, not whether wrongdoing is ultimately proved.

Knowingly fabricating information or deliberately making a malicious allegation may be addressed under the appropriate conduct, disciplinary or contractual procedure. Thallo will distinguish this from an honestly held concern that is not upheld.

11. Awareness and training

Thallo will make this procedure known to staff and other adults working within the provision. Induction and ongoing safeguarding arrangements will explain how to raise concerns, the relationship between whistleblowing and safeguarding, and the prohibition on retaliation.

12. Suffolk County Council contractual requirements

Where Thallo provides services under the CD1397 Alternative Education Rolling Select List Agreement, it will comply with the whistleblowing requirements in that agreement. This includes ensuring that staff are aware that the Council's Authorised Representative is an authorised person to whom a qualifying disclosure may be made, maintaining a whistleblowing procedure and notifying it to staff and adults.

Thallo will consider and incorporate reasonable amendments requested by Suffolk County Council within the contractual timescale applicable to the agreement.

13. Monitoring and review

The Provision Lead will monitor the operation of this policy, including whether concerns are being handled promptly, whether safeguarding referrals are made appropriately, whether confidentiality is maintained and whether any person experiences retaliation after raising a concern.

This policy will be reviewed at least annually and sooner following a significant concern, relevant contractual change or change in whistleblowing, safeguarding or employment law.