Whistleblowing Policy

Steffi Hesketh Tutoring – raising concerns about wrongdoing or unsafe practice

Document control	**Details**
Document	Whistleblowing Policy
Organisation	Steffi Hesketh Tutoring (sole trader), online-only tutoring agency, based in Southampton, Hampshire
Business address	32 Inver Way, Southampton, SO19 1SF
Policy owner	Steffi Hesketh-Spells, Owner and Designated Safeguarding Lead (DSL)
Deputy DSL	Shim Amin, contactable via the business email (steffihesketthtutoring@gmail.com)
Contact	steffihesketthtutoring@gmail.com, 07802 828910
Version	1.0
Effective date	November 2026
Review date	November 2027, or sooner after a serious incident, a change in law or guidance, or a change to the Hampshire contract
Applies to	Steffi Hesketh-Spells, all self-employed tutors, cover tutors, contractors, volunteers and anyone else working for or on behalf of the business
Contract	Hampshire County Council SEND Alternative Provision Register Agreement CS25116 and Tutoring Call-Off Contract CS25116A
Approved by	Steffi Hesketh-Spells. Signature: Steffi Hesketh-Spells, Owner and Designated

Document control	Details
	Safeguarding Lead. Date approved: 9 November 2026

1. Purpose

We want everyone who works with us to feel able to speak up if they think something is wrong. This policy explains how to raise a concern about wrongdoing, unsafe practice or a failure to protect children, what will happen, and the protection available.

Steffi Hesketh Tutoring is a small agency. The owner, Steffi Hesketh-Spells, is also the DSL. Because of this, the policy makes sure there is always a route that does not go through Steffi: the Deputy DSL, and the external bodies in section 6.

2. Scope

This policy applies to everyone working with or on behalf of the business, including independent self-employed tutors and cover tutors. Self-employed tutors may not have the same legal whistleblowing protection as employees or workers under the Public Interest Disclosure Act 1998, but we will apply the same protection to everyone who raises a genuine concern in good faith.

Parents, carers and pupils with a complaint about tuition or service should use the Complaints Policy. Anyone with a concern that a child is being harmed should follow the Safeguarding and Child Protection Policy straight away.

3. What is whistleblowing?

Whistleblowing means raising a concern, in the public interest, about wrongdoing, risk or malpractice connected with the business. Examples include:

- a child being put at risk, or safeguarding concerns not being reported or acted on;
- a tutor or other adult behaving in a way that breaks the Tutor Code of Conduct or crosses professional boundaries;
- concerns being covered up, or records being falsified;
- safer recruitment checks (such as DBS checks or references) not being carried out;
- fraud, bribery or dishonesty, including false session records or invoices to Hampshire County Council;
- misuse or unsafe handling of personal data;
- health and safety risks;
- breaches of law, or of our contract with Hampshire County Council;

- discrimination or unfair treatment of pupils;
- deliberately hiding any of the above.

A concern about your own contract terms, payments or a personal disagreement is not usually whistleblowing. Raise it with Steffi directly.

4. Our commitment to you

- We will take your concern seriously and deal with it promptly and fairly.
- You will not be penalised, victimised or lose work for raising a genuine concern in good faith, even if it turns out to be mistaken.
- We will keep your identity confidential as far as we can. Sometimes we may need to share it, for example where the police or a court require it, or where a fair investigation cannot happen otherwise. We will talk to you first wherever possible.
- You can raise a concern anonymously, but this can make it harder to investigate and to give you feedback.
- Anyone who victimises or discourages a person from raising a concern will be dealt with under the Tutor Code of Conduct.
- Knowingly false or malicious reports may be dealt with under contractual procedures. A concern that is not proven is not automatically malicious.

5. How to raise a concern inside the business

Your concern is about	**Raise it with**
A tutor, another adult or a general practice	Steffi Hesketh-Spells (Owner and DSL), 07802 828910, steffiheskethtutoring@gmail.com
Steffi Hesketh-Spells, or you feel you cannot raise it with her	Shim Amin (Deputy DSL), contactable via the business email (steffiheskethtutoring@gmail.com). If you would prefer Steffi not to see your concern, go straight to an external body in section 6.
Both Steffi and Shim, or internal routes have not worked	Go straight to an external body in section 6

How to do it:

- Raise it as soon as possible. You do not need proof, only a reasonable belief that something is wrong.

- Raise it by phone or in a meeting, then follow up in writing (email is fine). Say what happened, when, who was involved and any evidence.
- **If a child may be at risk, do not wait.** Follow the Safeguarding Policy: call 999 in an emergency, and report to the DSL or Deputy DSL the same day. You can also contact children's social care or the LADO directly at any time.
- Do not investigate yourself, confront the person involved or collect evidence in ways that break the law or data protection rules.

6. External routes

You can contact these bodies directly at any time, especially if the concern involves Steffi, if you have raised it and nothing has been done, or if you fear you would be treated unfairly. The numbers were checked on the official websites in November 2026.

Organisation	**When to use it**	**Contact**
NSPCC Whistleblowing Advice Line	Concerns about how child protection is being handled in the business. Free, can be anonymous. The NSPCC is a prescribed whistleblowing body for child welfare and protection.	0800 028 0285 (8am to 8pm Monday to Friday, 9am to 6pm at weekends), help@nspcc.org.uk
Hampshire LADO (Local Authority Designated Officer)	Allegations or concerns that an adult working with children (including Steffi or a tutor) has harmed a child, may pose a risk or may be unsuitable. Use for Hampshire pupils, including Council-referred pupils.	No telephone line. Online Hampshire LADO Enquiry Form if unsure; Hampshire LADO Notification Form emailed to LADO@hants.gov.uk to make a referral. Forms: www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations
Southampton LADO	As above, for Southampton pupils and for allegations connected to the business as a Southampton-based provider	023 8091 5535, LADO@southampton.gov.uk

Organisation	When to use it	Contact
Ofsted	Whistleblowing about children's services and settings that Ofsted regulates or inspects	0300 123 3155 (9am to 5pm Monday to Friday), whistleblowing@ofsted.gov.uk, or write to WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD
Hampshire County Council	Concerns about Council-referred pupils or about how we are meeting the CS25116 contract	The Council's contract manager, via the agreed secure route with the Council, or the pupil's SEN case officer
Hampshire Children's Services	A concern that a Hampshire child is at risk	Professionals (urgent): 01329 225379. Public: 0300 555 1384. Out of hours: 0300 555 1373
Police	A crime, or a child in immediate danger	999 in an emergency, 101 otherwise
Information Commissioner's Office	Concerns about misuse of personal data	ico.org.uk
Protect (independent whistleblowing charity)	Free, confidential advice on whether and how to raise a concern	protect-advice.org.uk

The Safeguarding and Child Protection Policy (Appendix 2) has the full list of Hampshire and Southampton safeguarding contacts.

Raising a concern with the media or on social media is very rarely appropriate and may not be legally protected. Please use the routes above.

7. What happens next

1. **Acknowledgement.** The person you told will acknowledge your concern within two working days where possible.
2. **Assessment.** They will decide whether it is a safeguarding matter (in which case the Safeguarding Policy is followed straight away, including any LADO referral within one working day), a whistleblowing matter, or a complaint or personal grievance.

3. **Investigation.** The concern will be looked into fairly and in proportion. This may involve asking for advice from, or referring to, the LADO, the police, Hampshire County Council or another body. For concerns about Steffi, the Deputy DSL will refer to the LADO or another external body rather than investigating alone.
4. **Feedback.** You will be told, as far as possible, what action has been taken. We may not be able to share everything, for example to protect other people's confidentiality.
5. **Record.** A confidential record is kept of the concern, the action taken and the outcome. Records relating to children are kept in line with the Safeguarding Policy.

If you are not satisfied with the response, or you do not hear back, use one of the external routes in section 6.

8. Telling Hampshire County Council

Where a whistleblowing concern involves a Council-referred pupil, the Council's data, possible fraud or a breach of the CS25116 contract, Steffi (or the Deputy DSL if the concern is about Steffi) will tell the Council as the contract requires. This never delays an urgent safeguarding referral.

9. Training and awareness

All tutors are told about this policy at induction and asked to confirm they have read it alongside the Tutor Code of Conduct and the Safeguarding and Child Protection Policy. Safeguarding training includes how to raise concerns about adults.

10. Monitoring and review

Steffi reviews this policy every year, and sooner if it is used or if the law or guidance changes. Contact details in section 6 are checked against official websites at each review.

11. Related policies

- Safeguarding and Child Protection Policy (version 1.1)
- Tutor Code of Conduct
- Anti-Bribery, Gifts and Hospitality Policy
- Personal Data Breach Procedure
- Health and Safety Policy (including Lone Working)
- Complaints Policy
- Safer Recruitment and Tutor Vetting Statement