

PACE Northwest - Whistleblowing Policy

Alternative Education Provider · Liverpool, England

Approved by: Board of Directors

Policy owner: Compliance & HR Manager

Effective date: 29 August 2025

Reviewed: 16 September 2026

Next review due: 16 September 2027 (or sooner if legislation, statutory guidance or organisational arrangements change)

Confidential whistleblowing contact: becs@pace-com.org · **Emergency:** 999

1. Purpose

PACE Northwest is committed to openness, integrity, accountability and a culture in which people can speak up about suspected wrongdoing without fear of retaliation.

This policy provides routes for raising concerns about wrongdoing in the public interest, explains how concerns will be handled and distinguishes organisational whistleblowing arrangements from the statutory protection available to qualifying workers who make a protected disclosure.

2. Scope and legal protection

This policy may be used by employees, directors, agency workers, contractors, consultants, volunteers, learners, apprentices, employers and partners who wish to raise a genuine concern about wrongdoing connected with PACE Northwest.

However, statutory whistleblowing protection under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 (PIDA), applies to people who fall within the relevant legal definition of a worker and who meet the conditions for a protected disclosure. The fact that PACE Northwest allows another person to use this policy does not itself create statutory PIDA protection.

3. What can be raised under this policy?

A whistleblowing concern will usually involve information that the person reasonably believes tends to show wrongdoing that is in the public interest. Qualifying categories include:

- a criminal offence;
- failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to health or safety;
- damage to the environment;
- sexual harassment; and
- deliberate concealment of information tending to show relevant wrongdoing.

Safeguarding, Prevent, fraud, bribery, corruption or serious regulatory concerns may also fall within one or more of these categories and should always be raised promptly through the appropriate route.

4. Whistleblowing, grievances and complaints

Whistleblowing is normally concerned with wrongdoing affecting others or the wider public interest. A personal employment grievance, such as an individual dispute about pay, treatment or contractual terms, should normally be raised under the Grievance Policy unless the circumstances also meet the public-interest whistleblowing test.

Learner or customer dissatisfaction that does not involve public-interest wrongdoing should normally be handled through the Complaints Procedure. PACE Northwest will redirect a concern to the appropriate procedure where necessary and tell the person raising it.

5. Principles

PACE Northwest will:

- encourage concerns to be raised as early as possible;
- take genuine concerns seriously and assess them objectively;
- protect confidentiality so far as reasonably possible;
- not tolerate retaliation, harassment or victimisation for raising a genuine concern;
- ensure investigations are proportionate and appropriately independent;

- manage conflicts of interest and provide alternative reporting routes;
- keep appropriate records and protect personal information; and
- take corrective, safeguarding, disciplinary or external-reporting action where warranted.

6. Internal reporting routes

Concerns should normally be raised as soon as reasonably possible through one of the following routes:

- **Confidential email:** becs@pace-com.org, monitored through PACE Northwest's designated confidential reporting arrangements.
- **Safeguarding or Prevent concern:** report immediately to the Designated Safeguarding Lead (DSL) or deputy in accordance with the Safeguarding Policy.
- **Concern involving the Compliance & HR Manager:** report directly to a Director.
- **Concern involving a Director or where normal management routes create a conflict:** report to another uninvolved Director or use an appropriate external route.

Concerns may be raised verbally or in writing. A written account is helpful but is not a condition of raising a concern.

7. Anonymous and confidential concerns

A person may ask for their identity to be kept confidential. PACE Northwest will respect this request so far as possible, but absolute confidentiality cannot be guaranteed where disclosure is legally required, necessary to protect a person or essential to a fair investigation.

Anonymous concerns will be considered, although anonymity can make investigation and feedback more difficult. PACE Northwest will assess the seriousness, credibility and available evidence rather than automatically rejecting an anonymous report.

8. How concerns will be handled

PACE Northwest will normally:

- acknowledge a concern within five working days where contact details are available;
- carry out an initial assessment to determine the nature, seriousness and appropriate route;
- consider immediate safeguarding, health-and-safety, evidence-preservation or other protective action;
- appoint an appropriate person to investigate or refer the matter, taking account of conflicts of interest;
- keep the person who raised the concern appropriately informed, subject to confidentiality, legal and safeguarding restrictions; and
- record the concern, decisions, actions and outcome securely.

Timescales for investigation will depend on complexity and any involvement of police, safeguarding agencies, regulators or other external bodies. The five-day acknowledgement target is not a guarantee that the investigation itself will be completed within a fixed period.

9. Safeguarding and Prevent concerns

Safeguarding concerns must not wait for the whistleblowing process. Any concern that a child, young person or adult at risk may be suffering or at risk of harm must be reported immediately through PACE Northwest's safeguarding arrangements.

Concerns about the conduct of an adult working with children must be managed under the Safeguarding Policy and allegations/low-level-concerns procedures, including consultation with the Local Authority Designated Officer (LADO) where the harm threshold is met or may be met.

Prevent concerns must be reported through the safeguarding route and handled in accordance with the Prevent Duty Policy and applicable statutory guidance.

10. External disclosures and prescribed persons

PACE Northwest encourages internal reporting where it is safe and appropriate because this can enable concerns to be addressed quickly. However, a worker does not always have to report internally first in order to make a legally protected disclosure.

A worker considering an external disclosure should ensure that the organisation or person is appropriate for the subject matter and that the statutory conditions for protection are met. The Government maintains an up-to-date list of prescribed persons and bodies and their areas of responsibility.

Depending on the issue, an appropriate external body may include Ofsted, the Health and Safety Executive, the Information Commissioner's Office, a relevant awarding/regulatory body, police, or another prescribed person with responsibility for the matter. PACE Northwest will not maintain a fixed list that could become outdated; individuals should check the current official prescribed-person list.

Workers may also seek independent advice before making a disclosure.

11. Protection from detriment

PACE Northwest will not tolerate retaliation against anyone who raises a genuine concern under this policy. Qualifying workers who make a protected disclosure have statutory protection from detriment and, where applicable, dismissal under whistleblowing law.

Legal protection does not depend simply on describing a concern as whistleblowing. Whether a disclosure is legally protected depends on the statutory conditions, including the worker's reasonable belief about the wrongdoing and public interest and the route through which the disclosure is made.

Any retaliation, victimisation or harassment connected with raising a concern may itself lead to disciplinary or other action.

12. Good faith, reasonable belief and deliberately false allegations

A person does not need to prove wrongdoing before raising a concern. They should provide information they honestly and reasonably believe indicates a problem.

A concern will not result in disciplinary action merely because it is mistaken or cannot be substantiated. However, deliberately fabricating evidence or knowingly making a false allegation may be dealt with under the relevant disciplinary or conduct procedure.

PACE Northwest will not use a broad 'good faith' requirement to deny whistleblowing protection where the statutory protected-disclosure conditions are otherwise met.

13. Sexual harassment disclosures

From 6 April 2026, sexual harassment is expressly included as a category of wrongdoing capable of forming the basis of a protected whistleblowing disclosure where the statutory conditions are met.

Personal experiences of sexual harassment may also engage PACE Northwest's Sexual Harassment & Sexual Violence Policy, Grievance Policy, safeguarding procedures and Equality Act responsibilities. PACE Northwest will identify the appropriate route or parallel routes without requiring the person raising the concern to understand the legal classification in advance.

14. Investigation, fairness and conflicts of interest

Investigations will be proportionate to the concern. The investigator should be sufficiently independent from the matter and may be an external specialist where appropriate.

People who are the subject of allegations will be treated fairly and information will not be shared more widely than necessary. Safeguarding or criminal investigations may limit what PACE Northwest can disclose or when it can approach individuals.

Where a concern involves the person who would normally receive or investigate it, responsibility will be transferred to an uninvolved senior person or external investigator.

15. Records and data protection

PACE Northwest will maintain secure records of whistleblowing concerns, assessments, investigations, decisions and outcomes. Access will be limited to those with a legitimate need.

Personal data will be processed in accordance with UK data-protection law, PACE Northwest's Data Protection Policy and applicable retention requirements. Records will be retained only for as long as necessary and lawful, taking account of safeguarding, employment, regulatory and limitation considerations.

16. Feedback and outcome

PACE Northwest will provide appropriate feedback to the person raising the concern where possible. This may include confirmation that the matter has been considered or concluded, but confidentiality, data-protection, safeguarding, legal privilege and employment obligations may prevent disclosure of detailed findings or action taken against another person.

Lack of detailed feedback should not be taken to mean that no action has been taken.

17. Independent advice and escalation

A worker who is unsure whether or how to raise a concern may seek independent advice, including from Acas, Citizens Advice, a trade union, a legal adviser or a specialist whistleblowing advice organisation.

If a person reasonably believes an internal concern has not been appropriately addressed, or internal reporting is unsafe or inappropriate, they may consider disclosure to the relevant prescribed person or another legally permitted recipient. The legal conditions differ depending on whom the disclosure is made to, so independent advice may be useful.

18. Monitoring and governance

The Board will receive an anonymised report on whistleblowing activity at least annually, covering the number and broad nature of concerns, themes, outcomes and improvement actions where appropriate.

Serious matters will be escalated to the Board sooner where necessary. Governance reporting must preserve confidentiality and must not interfere with safeguarding, criminal, regulatory or employment processes.

19. Related policies

- Safeguarding Policy.
- Reporting Low-Level Concerns Policy.
- Prevent Duty Policy.
- Staff Code of Conduct.
- Anti-Corruption & Bribery Policy.
- Sexual Harassment & Sexual Violence Policy.
- Complaints Procedure.
- Grievance Policy.
- Data Protection Policy.
- Health, Safety & Welfare Policy.

20. Contact

Confidential whistleblowing contact: becs@pace-com.org

Safeguarding concerns: DSL / safeguarding route

Immediate danger: dial 999.

Version control

v1.1 - reviewed 16 September 2026.