

LSDN Whistleblowing Policy	
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LSDN MISSION STATEMENT	
LSDN’s mission is to enhance the life chances, economic independence and social mobility opportunities of its service users by helping individuals to develop vocational, academic and life skills using a supportive and individualistic approach so service users can realise their fullest potential at home, in the workplace and in the community. LSDN works in partnership with its clients and local community to bring about the best possible results for each individual and their families.	
Purpose	This document sets out the policy and procedure for Whistleblowing to assist individuals who believe they have discovered malpractice or impropriety.
Scope	Applies to all staff and contractors of LSDN
Management Responsibility	Chief Executive, Director
Policy Headings	
Introduction	London Skills & Development Network (LSDN) is a not-for-profit Social Enterprise in the field of education and training services. As well as managing and delivering a range of education and training programmes, LSDN also offers a range of consultancy and capacity building

	support services to the education and training sector. LSDN is in the top 2% Training Providers for Learner satisfaction (National FE Choices Survey).
Description	LSDN is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable staff and other members of LSDN to voice concerns in a responsible and effective manner. It is a fundamental requirement of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employers' affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation, this information must be disclosed internally, without fear of reprisal, and there must be arrangements to enable this to be done independently of line management (although, in relatively minor instances, the line manager would be the appropriate person to be told). The current Public Interest Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. LSDN has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns. It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by LSDN, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the whistleblowing procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside LSDN. Scope of Policy

	This policy is designed to enable employees of LSDN to raise concerns internally at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and which may, at least initially, be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include: • Financial malpractice or impropriety or fraud; • Failure to comply with a legal obligation or Statute(s); • Dangers to Health & Safety or the environment; • Criminal activity; • Improper conduct or unethical behaviour; • Attempts to conceal any of these. Safeguards <u>i. Protection</u> This policy is designed to offer protection to those employees of LSDN who disclose such concerns provided the disclosure is made: • In good faith • In the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and that the individual makes the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action by the person(s) about whom the complaint was raised. <u>ii. Confidentiality</u> LSDN will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the
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	investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required. <u>iii. Anonymous Allegations</u> This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of LSDN. In exercising this discretion, the factors to be taken into account will include: • The seriousness of the issues raised • The credibility of the concern • The likelihood of confirming the allegation from attributable sources <u>iv. Untrue Allegations</u> If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure, the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual. <u>v. Procedures for Making a Disclosure</u> On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint must pass this information as soon as is reasonably possible to the appropriate designated investigating officer as follows: • Complaints of malpractice will be investigated by an appropriate Senior Manager unless the complaint is against the identified Senior Manager or is in any way related to the actions of the Manager. In such
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	cases, the complaint should be passed to the Chief Executive for referral. • In the case of a complaint, which is any way connected with but not against the CEO, the CEO will nominate a Senior Manager to act as the alternative investigating officer. • Complaints against the CEO should be passed to the Company Secretary who will nominate an appropriate investigating officer. • The complainant has the right to bypass the line management structure and take their complaint directly to the Board of Directors. The Board of Directors has the right to refer the complaint back to management if they feel that the management, without any conflict of interest, can more appropriately investigate the complaint. • Should none of the above routes be suitable or acceptable to the complainant, the complainant may approach the Investigating Officer who has been designated as independent point of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them. If there is evidence of criminal activity, the investigating officer must inform the police. LSDN will ensure that any internal investigation does not hinder a formal police investigation. Timescales Due to the varied nature of these sorts of complaints, which may involve internal investigators and/or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations. The investigating officer, should, as soon as practically
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	possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded. All responses to the complainant should be in writing and sent to their home address. Investigating Procedure LSDN recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission or the utility regulators) or where justified, elsewhere. In line with updated June 2025 UK legislation, LSDN recognises that prescribed persons now include: • HM Treasury – for disclosures related to financial sanctions • Secretary of State for Business & Trade – for trade sanctions • Secretary of State for Transport – for transport sanctions These additions reflect expanded whistleblower protections under the Public Interest Disclosure framework. The investigating officer should follow these steps: • Full details and clarifications of the complaint should be obtained. • The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures:
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	a) The investigating officer should consider the involvement of LSDN auditors and the Police at this stage and should consult with the Chief Executive. b) The allegations must be fully investigated by the investigating officer with the assistance where appropriate, of other individuals/bodies. c) A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Chief Executive Officer as appropriate. d) The Chief Executive Officer will decide what action to take. If the complaint is shown to be justified, they will invoke the disciplinary or other appropriate LSDN procedures. e) The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome. f) If appropriate, a copy of the outcomes will be passed to LSDN appointed Auditors to enable a review of the procedures. If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chief Executive Officer, or one of the designated persons described above. If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, LSDN recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.
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Links to other policies	Safeguarding, Complaints, Prevent, Finance, Disciplinary, Conflict of Interest, Staff Handbook
Policy monitoring and review arrangements	Policy is reviewed annually or as appropriate in line with legislative updates.