

Whistleblowing Policy

Lunar Learning Policy Date: August 2026 Review Date: August 2027



1. Purpose

Lunar Learning is committed to promoting a culture of transparency and accountability by encouraging the reporting of unethical, inappropriate or illegal behaviour within the company.

This policy provides a clear framework for staff, students and other stakeholders to raise concerns without fear of retaliation.

2. Policy Statement

Lunar Learning is committed to maintaining the highest standards of integrity and ethical conduct.

This policy provides a framework for employees, tutors, students and volunteers to report genuine concerns about wrongdoing, misconduct or breaches of legal or company requirements.

All concerns will be taken seriously and dealt with appropriately, fairly and, wherever possible, confidentially.

3. Scope

This policy applies to all:

- Employees
- Tutors
- Students
- Volunteers
- Other individuals associated with Lunar Learning

4. Definitions

Whistleblowing means reporting concerns about misconduct, unethical behaviour, illegal activity or violations of laws, regulations or company policies.

Reportable Concerns include, but are not limited to:

- Discrimination, bullying or harassment
- Safeguarding concerns or failures
- Health and safety violations
- Breaches of confidentiality or data protection
- Criminal activity, fraud or dishonesty
- Serious breaches of company policies or procedures

- Professional misconduct
- Any other behaviour which may place students, staff or others at risk

This list is not exhaustive.

5. Reporting Procedure

Step 1 – Raising a Concern

Concerns should normally be reported to the **Designated Safeguarding Lead (DSL)**, **Hayley Cottrell**.

07395746965 or email:

office@lunarlearning.co.uk

If this is not feasible or the individual does not feel comfortable raising the concern with the DSL, the concern can instead be reported to **Rebecca Radford, Founder**.

becky@lunarlearning.co.uk

07429022493

If a staff member or tutor feels unable to raise the issue with either of the above, alternative whistleblowing channels are available.

Alternative Whistleblowing Channels

Guidance on whistleblowing can be found through the **NSPCC Whistleblowing Advice Line**.

The NSPCC provides an alternative route for staff, trustees and tutors who do not feel able to raise concerns regarding child protection failures internally or who have concerns about the way a safeguarding concern is being handled.

The NSPCC can be contacted on:

Telephone: 0800 028 0285 **Opening hours:** 8:00am–8:00pm, Monday to Friday
Email: help@nspcc.org.uk

Independent advice can also be sought from **Protect**, an independent whistleblowing charity which provides confidential advice about whistleblowing.

Protect Advice Line: 020 3117 2520

Further information and support is available through the Protect website.

Where there is evidence or suspicion of criminal activity, the police may need to be informed. Lunar Learning will ensure that any internal investigation does not hinder or interfere with a formal police investigation.

Step 2 – Providing Information

Individuals raising a concern should provide as much relevant information as possible, including:

- Dates and times
- Locations

- Names of individuals involved
- Names of any witnesses
- Details of what happened or is believed to have happened
- Any relevant documents or other evidence

Individuals should not put themselves at risk or attempt to conduct their own investigation.

Step 3 – Anonymous Reports

Reports can be made anonymously.

However, providing contact details may help Lunar Learning to investigate the concern thoroughly, ask follow-up questions and provide appropriate updates.

Where possible, individuals are therefore encouraged to provide their contact details.

6. Confidentiality

Lunar Learning will treat all whistleblowing reports confidentially and will only disclose information on a need-to-know basis during the investigation process.

However, confidentiality cannot always be guaranteed. Information may need to be shared where this is necessary to protect an individual, particularly in relation to safeguarding concerns, or where there is a legal or regulatory requirement to do so.

Individuals raising concerns are also expected to respect the confidentiality of the matter and should not discuss it unnecessarily with others.

7. Protection from Retaliation

Lunar Learning prohibits any form of retaliation against individuals who raise genuine concerns in good faith.

Retaliation may include adverse actions such as:

- Harassment or bullying
- Dismissal or termination of employment
- Unfair or discriminatory treatment
- Intimidation or threats
- Any other disadvantage as a result of raising a concern

Any form of retaliation will be taken seriously and may result in disciplinary action.

An individual will not be penalised simply because a concern they have raised is not ultimately substantiated, provided that the concern was raised honestly and in good faith.

Knowingly making a false or malicious allegation may, however, result in disciplinary or other appropriate action.

8. Investigation Process

All reported concerns will be taken seriously and investigated promptly where an investigation is considered appropriate.

Investigations will be conducted impartially by an appropriately qualified or experienced person.

The investigation may involve:

- Reviewing relevant documents or information
- Speaking with the individual who raised the concern
- Speaking with witnesses or other relevant individuals
- Reviewing any other available evidence

Where a concern relates to safeguarding, Lunar Learning's safeguarding procedures will also be followed.

The individual who raised the concern will be kept informed of the progress of the investigation where appropriate and where doing so will not compromise the investigation or confidentiality.

9. Outcome

If a report is substantiated, appropriate corrective action will be taken.

Depending on the circumstances, this may include:

- Changes to policies or procedures
- Additional training or supervision
- Safeguarding measures
- Disciplinary action
- Referral to an external organisation or authority
- Reporting the matter to the police where appropriate

Where feasible, the individual who raised the concern will be informed of the outcome of the investigation.

The amount of information that can be shared may be limited by confidentiality, data protection or other legal requirements.

10. Review and Monitoring

This policy will be reviewed annually to ensure its effectiveness and continued compliance with relevant legal and regulatory requirements.

Feedback from staff and tutors will be considered where appropriate to help improve the policy and Lunar Learning's approach to whistleblowing.

Any lessons identified through whistleblowing concerns will be used to improve relevant policies, procedures and training.

11. Training and Awareness

Employees and tutors will receive appropriate information or training on this policy to ensure they understand:

- What types of concerns should be reported
- How concerns can be raised
- The protection available to individuals who raise genuine concerns
- Their responsibilities when dealing with whistleblowing concerns

Lunar Learning will promote an environment where individuals feel able to raise concerns openly and without fear of retaliation.

12. Governing Law

This policy shall be governed by the laws of **England and Wales**.

13. Implementation

All staff, tutors and volunteers are expected to comply with this policy and contribute to fostering a culture of openness, transparency and accountability.

Lunar Learning encourages anyone with a genuine concern about wrongdoing, unethical behaviour, safeguarding or serious breaches of company policy to raise the concern promptly through the appropriate channels.