



Institute for  
Advanced Learning  
& Metacognition

**INSTITUTE FOR ADVANCED LEARNING AND METACOGNITION**

*Advancing the Science of Learning*

# Whistleblowing Policy

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Policy and Procedures

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## Document Control

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## Approval and Review

Approved by	Role	Date	Signature
Fabian Lord	Chair of the Board of Trustees	24 <sup>th</sup> June 2026	

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## 1. Purpose and commitment

The Institute for Advanced Learning and Metacognition (IALM) is committed to being open, honest and accountable, and to maintaining a culture in which people feel able to speak up. This Policy aims to help anyone connected with the Institute to raise serious concerns about wrongdoing with confidence, and without fear of being victimised, disadvantaged or treated less favourably as a result.

It is written in the context of the Public Interest Disclosure Act 1998, which protects workers who “blow the whistle” about wrongdoing.

## 2. Scope

The legal protections of the Public Interest Disclosure Act apply to “workers” (including employees, agency staff and contractors). As a matter of policy, IALM extends the principles and protections of this Policy to its volunteers, trustees and members, and will treat their genuine concerns in the same way.

This Policy is for raising concerns about wrongdoing. It is not a route for personal complaints or grievances — those should be raised through the Institute’s grievance arrangements or its Complaints Policy.

## 3. What whistleblowing is

Whistleblowing is when a person raises a concern about wrongdoing, malpractice or a risk that affects others or the Institute. To be protected, the person should reasonably believe that the disclosure is in the public interest and tends to show one or more of the following:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a danger to the health or safety of any individual;
- damage to the environment;
- a failure to safeguard children or vulnerable adults; or
- the deliberate concealment of any of the above.

A whistleblower is a witness, not a complainant: you do not need to prove the wrongdoing, and it is not your responsibility to investigate it. You simply need to raise the concern so that it can be addressed.

## 4. Our commitment to protect you

Anyone who raises a genuine concern under this Policy will be supported and protected from harassment, victimisation or detriment of any kind. Raising a genuine concern will not affect your position, employment, membership or standing with the Institute.

Your concern will be treated in confidence if you ask, and your identity will not be disclosed without your consent unless the Institute is required to do so by law, or it becomes unavoidable in order to investigate the matter — in which case we will discuss it with you first. You may raise a concern anonymously, although anonymous concerns are harder to investigate and to provide protection in respect of.

If, however, a person knowingly or maliciously makes an untrue allegation, the Institute may take disciplinary or other appropriate action. Raising a concern does not protect a person from the consequences of their own wrongdoing.

## 5. How to raise a concern

In most cases, you should raise your concern internally in the first instance:

- ordinarily, with your line manager or main point of contact at the Institute; or
- if that is not appropriate — for example, because of the seriousness or sensitivity of the matter, or because it concerns that person — directly with the Institute's designated Whistleblowing Officer, Montgomery Lord; or
- if the concern relates to the Whistleblowing Officer or a trustee, with the Chair of the Board of Trustees (or, if it concerns the Chair, with another trustee).

Please raise your concern in writing where possible, setting out the background, with names, dates and places where you can, and the reasons for your concern. You may bring a colleague or representative with you to any meeting about a concern you have raised.

If you would like free, confidential and independent advice at any stage, you can contact Protect, the independent whistleblowing charity ([protect-advice.org.uk](https://protect-advice.org.uk)). Disclosures made to a legal adviser in the course of obtaining legal advice are also protected.

## 6. How we will handle your concern

The Institute will take your concern seriously and decide how best to deal with it. This may involve internal enquiries, an investigation by the Whistleblowing Officer or the trustees, action under the disciplinary process, or referral to the police, the Charity Commission, or another appropriate agency.

We will acknowledge your concern, keep you informed of progress and the outcome wherever it is appropriate to do so, and explain how the matter has been handled. If a

concern is not confirmed by investigation, the matter will be closed, and you will not be treated any differently for having raised it.

## 7. Raising a concern externally

We hope you will feel able to raise concerns internally. However, the law also allows protected disclosures to be made to certain “prescribed persons” where it is appropriate — for example, where the matter is not resolved internally, or where internal disclosure is not appropriate. The most relevant prescribed persons for IALM include:

- the Charity Commission for England and Wales (the charity regulator);
- the Health and Safety Executive (HSE);
- HM Revenue & Customs (HMRC);
- the Information Commissioner’s Office (ICO); and
- the police.

A full list of prescribed persons is published by the UK government at [gov.uk](http://gov.uk). Where a concern relates wholly or mainly to another organisation, it should be raised with that organisation or the relevant regulator.

## 8. Whistleblowing and safeguarding

Where a concern relates to the safety or welfare of a child or vulnerable adult — including a concern about the conduct of a member of staff, volunteer or member — it must also be raised under the IALM Safeguarding Children Policy and with the Designated Safeguarding Lead, without delay. Safeguarding a child always takes priority.

## 9. Related policies

- IALM Safeguarding Children Policy;
- IALM Complaints Policy;
- IALM grievance arrangements;
- IALM Disciplinary procedures; and
- IALM Members’ Charter.

## 10. Review of this Policy

This Policy will be reviewed by the Board of Trustees at least every two years, or sooner if required by changes in law or guidance, to ensure it remains effective and current.