

WHISTLEBLOWING POLICY

Issue	Date	Sections Affected	Description of Change / Change Request Reference / Remarks	Amended & reviewed by
3	16/11/23	N/A	Updated	SB
3	12/11/24	N/A	Reviewed	CC
3	13/03/2026	ALL	Complete re read and check for and required changes. No other amendments required at this time.	RR
4	01/07/2026	Whistleblowing and Confidential Reporting	Updated to reflect sections 4.25 and 4.26 of the Financial Handbook for Independent Training Providers, strengthening arrangements for confidential reporting, escalation to the Board, recording, monitoring and protection from victimisation.	CC
5	21/07/26	Blowing the whistle to the DFE	Clear direction of blowing the whistle to the DFE	CC

This Policy should be read alongside the Maladministration & Malpractice Policy (Whistleblowing) and the Employee Code of Conduct Policy.

Definition:

Whistleblowing is when an employee of an organisation passes on information that they reasonably believe shows wrongdoing or a cover up by that organisation. This might be about activity that is:

- illegal
- risk to others' health and safety.
- is about poor practice or leadership.
- failure to meet statutory requirements
- linked to Safeguarding / Prevent issues.

WHISTLEBLOWING POLICY

As long as you fit the [criteria for whistleblowing](#), you are protected under the law.

To be a whistle-blower, you need to be a worker. This includes:

- employees.
- temporary agency staff.
- home workers.
- trainees on vocational schemes.
- people whose employment has ended.

For those not covered by whistleblowing legislation, His Majesty's Chief Inspector (HMCI) will listen to their concerns seriously and consider them when an inspection of the organisation occurs. This includes:

- self-employed people
- volunteers

His Majesty's Chief Inspector (HMCI) is a [prescribed person](#), which means they are listed in legislation as someone you can whistle blow to regarding Safeguarding issues / concerns.

The legislation that underpins the HCMI whistleblowing role is the [Public Interest Disclosure Act 1998](#) and the [Employment Rights Act 1996](#).

Accessibility and Scope

This policy is readily accessible to all employees, workers, contractors, board members and any other individuals who carry out work related to DfE-funded delivery on behalf of Training Works. It applies to organisation-wide whistleblowing concerns and to concerns specifically linked to DfE-funded delivery, including apprenticeship funding, learner safety, governance, financial management, fraud, safeguarding, Prevent, compliance with funding rules and misuse of public funds.

How to Whistle blow

Training Works has a Whistleblowing Policy as part of its Maladministration & Malpractice Policy. You are encouraged to follow the process outlined in the Policy for reporting concerns. However, we acknowledge that at times you may want to go beyond the level of reporting outlined in the Policy.

WHISTLEBLOWING POLICY

If you wish to make an internal whistleblowing disclosure, you should raise your concern as soon as possible with your line manager, a member of the senior leadership team, the Director responsible for the area of concern, or the Chair of the

Board where the concern relates to senior leadership, governance, finance, public funding or potential breach of the Financial Handbook for Independent Training Providers. Concerns can be raised verbally or in writing and should include, where possible, the nature of the concern, relevant dates, people involved, supporting evidence and whether the concern has already been raised elsewhere.

If the concern relates to DfE-funded delivery, individuals may also make a disclosure directly to the Department for Education.

The GOV.UK guidance "[Blowing the whistle to the Department for Education](#)" explains how to make a disclosure about an academy or post-16 provider and states that disclosures about a post-16 provider can be made through the DfE customer help portal, including anonymously by using the guest option, or in writing to:

Customer Service Team
Department for Education
Cheylesmore House
Quinton Road
Coventry
CV1 2WT

Training Works has a Board of Governors.

You are free to approach the Board directly via the chair, this will be in confidence, with your concern: maureen@training-works.co.uk

Alternatively, you can contact **OFSTED** directly:

- call whistleblowing hotline on 0300 1233155 (8am to 6pm, Monday to Friday)
- email whistleblowing@ofsted.gov.uk
- write to: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD

You can also contact the [NSPCC National Whistleblowing Advice Line](#).

The [NSPCC is also a prescribed person](#) for providing protection to those making any disclosures about child welfare and protection.

WHISTLEBLOWING POLICY

Independent Advice

We cannot advise whether you will receive legal protection in your specific case, but you can get independent advice for this at any time. You may also want to check who is the best person to whistle blow to, discuss how to raise your concern or simply to talk the matter through in confidence.

You can do this with:

- your union or professional body
- the local safeguarding partners for your area
- the independent whistleblowing charity [Protect](#)
- an independent legal adviser

How Training Works Deals with a Whistleblowing Disclosure

Training Works will deal with whistleblowing disclosures fairly, consistently and without unreasonable delay. The concern will be acknowledged within five working days where contact details have been provided. An initial review will normally be completed within ten working days to determine the nature of the concern, whether urgent action is required, who should investigate it and whether the matter needs to be escalated to the Chair of the Board, DfE, Ofsted, ESFA, a safeguarding partner, the police or another prescribed body.

Where an investigation is required, this will be completed as promptly as possible and will normally aim to conclude within twenty working days. If the matter is complex, involves external agencies, or requires additional evidence, the individual raising the concern will be informed where appropriate that more time is needed. Training Works will provide feedback on the outcome where it is appropriate and lawful to do so, while protecting confidentiality, data protection obligations and the integrity of any investigation.

All whistleblowing disclosures will be recorded securely, including the concern raised, action taken, timescales, outcome, escalation, learning identified and any improvements required. The Board will monitor whistleblowing arrangements to ensure concerns are handled effectively and that learning is used to strengthen governance, risk management, safeguarding, compliance and public funding assurance.

WHISTLEBLOWING POLICY

Confidentiality

You may be encouraged to share your identity with the external organisation you have contacted, even if you want them to keep you identify confidential from Training Works because:

- if they know who you are, it will help them to keep your identity confidential when they investigate your concerns
- it is useful for them to contact you for more information
- it supports whistle-blowers to receive the [legal protections](#) available

Internally at Training Works, we will always do everything we can to help keep your identity confidential. However, depending on the nature of the information you provide, this may not be possible. We will however discuss this with you.

Protection for the Person Making the Disclosure

Training Works will not tolerate victimisation, bullying, harassment, dismissal, disadvantage, intimidation or any other detrimental treatment because an individual has raised a genuine whistleblowing concern. Anyone who raises a concern in good faith will be treated respectfully, listened to seriously and supported throughout the process. Any attempt to treat a person unfairly because they have made a protected disclosure may be managed under the appropriate disciplinary or governance process.

Individuals can find further information about legal protection and what counts as whistleblowing in the GOV.UK guidance “Whistleblowing for employees”. Individuals can also seek free, confidential and independent advice from Protect, the UK whistleblowing charity, which advises and supports individuals and organisations on raising concerns safely and building effective speak-up arrangements.

Training Works will consider appropriate support for the individual raising the concern, taking account of the nature of the disclosure and the person’s circumstances. This may include a confidential discussion with an appropriate senior contact, agreed welfare check-ins during the process, signposting to independent advice, reasonable adjustments where needed, and clear communication about what will happen next. Support will be offered sensitively and without pressuring the individual to withdraw or change their concern.

Financial Handbook for Independent Training Providers: Whistleblowing and Confidential Reporting

Training Works is committed to maintaining a culture of openness, accountability and transparency.

In line with sections 4.25 and 4.26 of the Financial Handbook for Independent Training Providers, Training Works will ensure that staff, board members, governors, contractors, apprentices, employers and other stakeholders are able to raise genuine concerns about wrongdoing, malpractice, financial irregularity, safeguarding, fraud, misuse of public funds, poor governance, failure to comply with funding rules or any other serious concern without fear of victimisation, disadvantage or unfair treatment.

Concerns may include, but are not limited to:

- suspected fraud, theft, bribery or financial mismanagement;
- misuse of public funding or failure to comply with DfE funding requirements;
- deliberate concealment of information relating to financial, operational or safeguarding matters;
- failure to comply with legal, regulatory or statutory obligations;
- unsafe practice, safeguarding concerns or Prevent-related concerns;
- bullying, harassment, discrimination or abuse of position;
- conduct that damages public trust, learner safety, organisational integrity or the reputation of Training Works;
- attempts to prevent or discourage an individual from raising a concern.

Training Works will ensure that whistleblowing concerns are taken seriously, recorded appropriately, investigated proportionately and escalated where required. Individuals raising concerns in good faith will be protected from victimisation or detrimental treatment. Any attempt to victimise, intimidate or disadvantage an individual for raising a genuine concern may be treated as a disciplinary matter.

Where a concern relates to senior leadership, governance, financial control, public funding, serious misconduct or a potential breach of the Financial Handbook for Independent Training Providers, the matter must be escalated to the Chair of the Board.

The Chair will ensure that the concern is reviewed independently and that appropriate action is taken. Where the concern relates to the Chair, the matter should be escalated to another appropriate board member or, where necessary, to an external prescribed body.

WHISTLEBLOWING POLICY

Training Works will maintain a confidential record of whistleblowing concerns, including the nature of the concern, action taken, outcome, any learning identified and any required reporting or escalation. Records will be stored securely and only shared with those who need access to manage, investigate or resolve the concern.

The Board will receive oversight of whistleblowing arrangements and will monitor whether concerns are being handled effectively, fairly and in line with this policy. This oversight supports effective governance, assurance, risk management and compliance with the Financial Handbook for Independent Training Providers.

Where appropriate, whistleblowing concerns may also be raised with external prescribed bodies, including Ofsted, the Department for Education, the Education and Skills Funding Agency, Protect, or another relevant regulator or authority. Individuals are encouraged to seek independent advice if they are unsure how to raise a concern or whether whistleblowing protections may apply.

Training Works will review this policy regularly to ensure it remains compliant with current legislation, funding requirements, regulatory expectations and the Financial Handbook for Independent Training Providers.