POLICY ON WHISTLEBLOWING – Review Feb 2026

1. Purpose of this Policy

1.1 Employees are often the first to realise that there may be something seriously wrong within an organisation. However, they may not express their concerns because they feel that speaking out would be disloyal to colleagues or their employer. They may also fear harassment or victimisation. In these circumstances it may seem to be easier to ignore the concern than to report what may be just a suspicion of malpractice. Bespoke Training and Education (BT&E) is committed to combating malpractice and, if it is discovered, to dealing with it seriously and urgently, to deter it in future and to promote a culture of openness and accountability.

1.2 The purpose of this policy is to encourage disclosure of concerns about malpractice so that those concerns can be investigated, without fear of reprisals, so long as the concerns are genuine and made in the public interest, rather than overlooking the problem or 'blowing the whistle' outside. The meaning of 'malpractice' is explained in paragraph 2.

2. Scope of this Policy

2.1 This policy applies to all individuals working at all levels of the organisation, all staff including casual staff, agency staff, volunteers, contractors and supporting committees.

2.2 There are existing procedures in place to enable employees to raise grievances about their personal employment situation (e.g. the grievance procedure, the disciplinary procedure or the capability/competence procedure). This policy is not intended to cover concerns that fall within the scope of those other procedures, nor to provide a means of review or appeal against individual management decisions unless in each case they involve malpractice.

2.2 There is no legal definition of 'whistleblowing' or of 'malpractice'. For the purpose of this policy, 'malpractice' in relation to

- fraud, theft, corruption, bribery or other financial irregularities;
- other criminal activities or dishonesty;
- failure to comply with a legal obligation, the staff code of conduct, the financial regulations or the Corporation's Standing Orders;
- a miscarriage of justice;
- creating or ignoring a serious risk to health, safety or the environment
- the deliberate concealment of any of the above matters

(whether by other employees, contractors, the public or members of the Corporation).

3. Procedure for Raising Concerns

3.1 Genuine concerns about suspected malpractice affecting any of BT&E activities should be raised at the earliest opportunity with your line manager. If this is inappropriate, perhaps because of the seriousness of the allegations or because of who is believed to be involved, concerns should be raised with the director of BT&E. In any case involving an allegation of fraud or other financial irregularities, the Chair of the Audit Committee should also be notified.

3.2 Concerns are best raised in writing, setting out the background, history and reasons for the concern, giving names, dates and places where possible. If you feel unable to put your concern in writing, you can telephone or meet the appropriate person and a note of your concern will be made.

3.3 If you raise a concern and do not want your name to be disclosed to the perpetrator of the alleged malpractice, the person(s) with whom you raise the concern will not do so without your prior approval. You should appreciate that if the investigation process is to be carried forward effectively, your identity may have to be revealed and a statement by you may be required as part of the evidence.

4. BT&E's Response

4.1 The action taken by BT&E will depend upon the type of concern. The matters raised may be

- investigated internally;
- reported to the police (this will normally be the case if criminal activity is suspected), the internal or financial statements auditors.

4.2 Initial enquiries will be made promptly to decide whether an investigation is appropriate and, if so, what form it should take. Concerns which fall within the scope of specific procedures (for example, harassment or discrimination issues) will normally be referred for consideration under those procedures.

4.3 Some concerns may be resolved by agreed action without the need for investigation.

4.4 Within ten working days of your concern being received, you will normally receive a written acknowledgement, sent to your home address. Thereafter, while it is not possible to stipulate specific timescales due to the nature of investigations of this type, you will be kept generally informed on how the matter is to be dealt with and the progress and outcome of the investigation.

4.5 The amount of contact between the person(s) considering your concerns and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from yo

5. How the Matter Can Be Taken Further

5.1 If you are not satisfied that your concern is being properly dealt with, you may refer it to the director of BT&E

5.2 This policy is intended to provide you with a way of raising concerns within BT&E. If, having used the alternatives above you are not satisfied with how the matter has been addressed and you feel it is right to take the matter outside BT&E, the following are possible contact points –

- the financial statements auditors
- the Skills Funding Agency
- the Department for Business Innovation & Skills
- your solicitor
- the police
- a member of parliament
- a trade union

In addition, Public Concern at Work, an independent, non-statutory charitable body, provides advice to individuals with concerns about malpractice at any time.

Details of where some of the above can be contacted is in paragraph 9 below.

6. Protection for Whistleblowers and Penalties for Abuse

6.1 BT&E will take reasonable action to protect you when you raise a concern which you reasonably believe to be in the public interest. Such action will be as follows:

- confidentiality clauses in contracts of employment will not be applied to the raising of such concerns under this policy;
- any action designed to prevent or deter an individual from raising a genuine concern of malpractice or to victimise an individual for doing so will be regarded as a serious disciplinary offence.

Unless proved otherwise it will be assumed that the person using this policy has a genuine concern and is not making the disclosure for personal gain or out of personal motive, even if an investigation results in the concern proving unfounded, provided that the person using this policy had reasonable grounds for believing that the information disclosed indicated the commission of malpractice.

6.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment you should inform your line manager immediately. If the matter is not remedied you should raise it formally using the grievance procedure.

6.3 This protection does not mean that if you are already the subject of disciplinary or other procedures relating to your employment, those procedures will be halted as a result of your whistleblowing.

6.4 Abuse of this policy by the malicious raising of unfounded allegations will be considered a serious disciplinary offence.

7. Anonymous Complaints

7.1 You are strongly encouraged to put your name to your concern. Concerns expressed anonymously are much less powerful, can be difficult to investigate effectively and may deprive those alleged to be guilty of malpractice of part of the means by which to defend themselves. Anonymous complaints may, however, be considered at the discretion of BT&E taking into account the nature and seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

7.2 Recipients of anonymous complaints should refer them to the director of BT&E, who may, after considering the above factors, discuss the matter, initially informally, with the subject of the complaint. If the director is satisfied that the complaint is totally without foundation, the complaint will be destroyed.

8. Monitoring

8.1 BT&E will monitor the reporting of concerns under this policy as part of its monitoring of complaints generally.