

Whistleblowing Policy

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Whistleblowing Policy

1.0 Purpose

Talented Training Ltd is committed to the highest standards of openness, probity and accountability. We take seriously the need to operate in a climate of openness in which legitimate grievances can be raised without fear of reprisal and are committed to:

- Fostering a culture of openness
- Encouraging a consultative style of management
- Ensuring that the standards of conduct the company sets itself (e.g. in its code of ethics and codes of conduct for staff) are understood and observed.
- Promoting accountability
- Raising awareness that genuine and legitimate concerns will be treated seriously

The Public Interest Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employer because of reporting certain serious concerns. Talented Training Ltd has endorsed the provision set out below to ensure that our people will not feel at a disadvantage because of 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 the company, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

1.1 Scope

All employees and workers employed by Talented Training Ltd. Other individuals including learners, and other stakeholders are also encouraged to follow the procedure set out in the policy.

This policy is designed to enable employees of Talented Training Ltd to raise concerns internally and 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 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 Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

2.0 Safeguards

Protection - this policy is designed to offer protection to those employees of Talented Training Ltd 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 if they make the disclosure to an appropriate person. 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 on the part of the people complained about.

Confidentiality - Talented Training Ltd 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 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.

Anonymous Allegations - 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 the Company. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations - 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.

3.0 Whistleblowing Procedure

Stage 1 – Raising your initial concern

If you witness or suspect there is some wrongdoing or malpractice taking place or about to take place, it is important to keep calm and discuss the issue informally with the appropriate manager.

Your initial concern should be raised as soon as possible and submitted using the Whistleblowing Report Form – Appendix 1.

The issue may be resolved through informal discussion. If the issue is resolved at this stage, no further action is required.

Stage 2 – Formal

If the concern/issue cannot be resolved, the matter will be escalated to an appropriate Manager who will oversee or conduct the investigation. An investigation meeting will be held by an appropriate manager and if necessary relevant investigating personnel. The concern will be explored and discussed fully. This meeting should be documented.

The meeting may decide:

- There is no case to answer and further action is not justified – the reason for this decision must be made clear to you
- The matter could be resolved through mediation – if you are happy with this, the other party will be informed, and discussions will take place
- There is a case to answer, and the matter will be referred to a disciplinary hearing. If the concern is not resolved, this becomes a formal concern that needs to be investigated.

Stage 3 – Appeal/Immediate Escalation

If your concern/complaint has not been resolved at either stage one or two of this policy or if your concern requires immediate escalation to stage three, you can send (post or email) the original whistleblowing report form along with the investigation report to the Managing Director (MD) who will decide on the appropriate action.

Within 10 working days of receiving a stage three concern, the MD will write to the discloser to:

- Acknowledge that the concern has been received
- Give an estimate of how long it will take to provide a final response
- Explain whether any initial enquiries have been made
- Explain whether further investigations are to take place

If an investigation has not been carried out by Stage 3 and it is appropriate to do so, one will be carried out by an appropriate manager and a report compiled and submitted to the MD. Stage three will follow the same stage 2 outcomes – no case to answer, mediation, referral to disciplinary hearing. This concludes the end of Talented Training's process.

Talented Training Ltd recognises the lawful rights of individuals to make disclosures to prescribed persons or bodies and where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. A full list of prescribed bodies can be found on the Government Website www.gov.uk.

Points to note:

If the allegation relates to fraud, potential fraud or other financial irregularity the CEO will be informed within 5 working days of receipt of the allegation. The MD will determine whether the allegation should be investigated and the method of investigation.

If the allegation concerns suspected harm to children, the appropriate authorities will be informed immediately. If the issue is around suspected harm to vulnerable adults or young people in the Safeguarding Policy should be referred to. If you do not feel able to report your concern internally, you can contact the NSPCC's dedicated helpline. This provides an alternative route for colleagues who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by Talented Training Ltd. Staff can call 0800 028 0285 – the line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

3.1 Reporting in Good Faith

If you make an allegation in good faith, but it is not confirmed by investigation, no action will be taken against you. If, however, you make allegations that are malicious or simply to cause anger, irritation or distress, disciplinary action may be taken against you.

3.2 Unfair Treatment After Whistleblowing

Whistleblowers are protected by law from suffering a detriment, bullying or harassment from another employee – if the disclosure is made in the public interest and made in good faith. Talented Training Ltd is committed to ensuring that employees who use this policy to raise a concern will not be treated unfairly as a result of doing so. We will not tolerate any attempt to victimise the whistleblower or attempts to prevent concerns being raised and will consider any necessary disciplinary or corrective action appropriate to the circumstances.

Complaints about unfair treatment following whistleblowing should be reported to the investigating officer or Managing Director.

3.3 Records

An official written record will be kept of each stage of the procedure, with all information stored in line with Data Protection and GDPR regulations.

4.0 Document Control

Below is the change history and document 'sign off' information.

4.1 Version Control

Record of Amendments		
Version Number	Date of Issue	Detail of Change
V1.0	Jan 2023	Policy Re-write and issue.
V2.0	May 2024	Policy update.
V3.0	May 2025	Policy review and update.

4.2 Next Review Date

The next scheduled review of this document will be May 2026 or earlier if there is a need for an additional review.

4.3 Document Authorisation

Document Authorisation		
Name and Position	Signature	Date

Laura Jambawai Quality and Adult Skills Lead	LJambawai	20 May 2025
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5.0 Appendix 1

Whistleblowing Letter Template

To:
From: <i>(name and contact details of whistle blower)</i>
Date of submission: <i>(when the individual makes the whistleblowing concern)</i>
Nature of concern: <ul style="list-style-type: none"> • <i>an outline of the known or suspected wrongdoing</i> • <i>details, to the best of your knowledge, about when, where it occurred.</i> • <i>a list of the names of those suspected of being involved.</i> • <i>a list of the names of anyone who may have relevant information.</i> • <i>details of how you came to know about the suspected activities.</i> • <i>what, if any breaches of internal controls, policy and procedure or other requirements you believe took place</i> • <i>the name of anyone who you have discussed or reported this incident to</i> • <i>your name and contact details (these will be kept confidential as far as reasonably practicable)</i> • <i>the date and time of making the report.</i>
Details of any previous attempts to raise a concern <i>(what, who with, if this applies)</i>
Outcome of any previous investigations <i>(if this applies)</i>
Comments/ suggestions for action <i>(if appropriate)</i>
Signed by the individual.