

Whistleblowing and Protected Disclosures Policy

Skills Bootcamp Provision | Adult Learners 19+ | Version 2.0

Policy field	Current position
Provider	Quack Recruitment & Training Ltd
Applies to	Employees, workers, directors, agency workers, trainees, contractors, consultants, associates, subcontractor personnel and other people raising concerns about Quack activities. Learners, employers and other stakeholders may also use the route, although statutory whistleblowing protection depends on legal status and circumstances.
Policy owner	Dion Bishop - Director of Contracts & Operations
Operational lead	Jessica Roughton - Quality & Compliance Lead, DSL and SEND Lead
Alternative internal contact	Dion Bishop or Jessica Roughton, depending on who is implicated. Where both are implicated, or an internal route is reasonably considered unsafe, the concern may be sent to the Independent Governor / external governance adviser or an appropriate external body.
Independent escalation	Sealed correspondence marked "Private and Confidential - Independent Governor" sent to Quack Recruitment & Training Ltd head office must be passed unopened to the addressee.
Designated Safeguarding Lead	Jessica Roughton
Deputy Designated Safeguarding Lead	Aaron Jones
Internal reporting email	compliance@quackrecruitmentandtraining.co.uk - mark the subject "Private and Confidential - Whistleblowing"
Telephone / postal route	0333 577 0036 Business & Technology Centre, Bessemer Drive, Stevenage, Hertfordshire, SG1 2DX
Approved records	Restricted whistleblowing register, secure investigation file, governance records, HR records and safeguarding / Prevent records where the concern requires those procedures.
Effective date	August 2026
Next review	August 2027, or sooner following legislative, employment, safeguarding, funding, awarding-organisation, Ofsted or operational change

Policy intent:

People must be able to raise serious concerns about wrongdoing safely, promptly and without fear of retaliation. Quack will listen, protect confidentiality as far as reasonably possible, act on credible concerns, preserve evidence, investigate independently and notify funders, regulators, awarding organisations or enforcement bodies where required.

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1. Purpose and Policy Intent

Quack Recruitment & Training Ltd is committed to an open culture in which people can report suspected wrongdoing that affects learners, staff, public funds, qualification integrity, employers, commissioners or the wider public. Raising a concern early can prevent harm, protect public money, strengthen safeguarding and help leaders correct weaknesses before they become more serious.

This policy explains what whistleblowing is, how it differs from a personal grievance or service complaint, how concerns can be raised, how Quack will protect the person speaking up, how disclosures will be triaged and investigated, and when external notification may be necessary.

The policy is intended to be used in good faith. A person does not need proof before raising a concern and will not be penalised because a genuine concern is not substantiated. Quack expects reasonable belief and honest reporting, not certainty.

2. Scope and Who May Use This Policy

Person / group	How this policy applies
Employees and workers	May make a protected disclosure where the statutory conditions are met. Protection can apply from the beginning of employment and can continue after employment ends.
Agency workers and qualifying trainees	May be protected under whistleblowing law depending on their legal status and the facts.
Contractors, consultants and associates	May use the internal route. Statutory protection depends on whether the individual falls within the legal definition of worker.
Directors and volunteers	May use this policy and will receive Quack's non-retaliation commitment, but statutory protection may not apply in every case.
Learners, employers and stakeholders	May report serious wrongdoing through this route. Complaints, safeguarding, assessment appeals or funder routes may also apply. Quack will triage the issue rather than requiring the reporter to choose the perfect procedure.
Subcontractor personnel	Should normally raise the concern with their employer and may also report to Quack where the concern affects Quack-funded activity, learners, evidence, public funding or safeguarding.

The policy applies to past, current or anticipated wrongdoing connected with Quack's recruitment, training, assessment, learner support, employer engagement, funding claims, data, safeguarding, governance, supply chain and business operations.

3. Legal and Regulatory Context

Framework	Relevance
Employment Rights Act 1996, as amended	Protects qualifying workers from detriment and employees from unfair dismissal where they make a protected disclosure through an appropriate route.
Public Interest Disclosure Act 1998	Established the statutory whistleblowing framework by amending the Employment Rights Act 1996.
Employment Rights Act 2025 changes effective 6 April 2026	Sexual harassment is expressly included as a qualifying category of wrongdoing for whistleblowing protection.
Equality Act 2010	Victimisation, discrimination or harassment may require EDI, dignity-at-work or safeguarding action as well as whistleblowing handling.
UK GDPR and Data Protection Act 2018	Require whistleblowing information, witness evidence and investigation records to be processed lawfully, securely and proportionately.
Funder, awarding-organisation and Skills Bootcamp requirements	May require immediate notification of fraud, financial irregularity, safeguarding, malpractice, data or other serious concerns.
Ofsted further education and skills expectations	Inspectors consider whether staff can raise concerns, whether leaders act on issues and whether governance provides challenge and oversight.

Legal note:

This policy does not provide legal advice or guarantee that every disclosure will meet the statutory test. Legal protection depends on the facts, the person's legal status, the public-interest test, the type of wrongdoing and the route used. People may seek independent advice from Acas, a trade union, Protect or a legal adviser.

4. Definitions

Term	Meaning
Whistleblowing	Reporting suspected wrongdoing that the person reasonably believes is in the public interest.
Protected disclosure	A disclosure that meets the statutory conditions for whistleblowing protection.
Public interest	A reasonable belief that the issue affects others or an important wider interest, rather than being solely a private employment dispute.
Detriment	Unfair treatment because a person raised a whistleblowing concern, such as threats, exclusion, reduced hours, blocked progression, bullying or harassment.
Prescribed person	An external person or body named in legislation to receive disclosures about matters within its remit.
Reporter / whistleblower	The person who raises the concern. The term does not imply the concern has already been proven.
Subject of concern	A person or organisation whose conduct is raised in the disclosure.
Anonymous disclosure	A concern raised without identifying the reporter.
Confidential disclosure	A concern where Quack knows the reporter's identity but restricts access to it as far as reasonably possible.

5. What Counts as Whistleblowing

A worker may qualify for legal protection where they reasonably believe that the disclosure is in the public interest and tends to show that one or more of the following has happened, is happening or is likely to happen:

- a criminal offence, including fraud, bribery, theft, forgery or deliberate falsification;
- a breach of a legal obligation;
- a miscarriage of justice;
- danger to a person's health or safety;
- damage to the environment;
- sexual harassment;
- deliberate concealment of information tending to show any of the above.

A concern may also involve breaches of funding rules, qualification requirements, safeguarding duties or regulatory expectations. Whether it is legally protected will depend on how the facts fit the statutory categories and the public-interest test.

6. What Should Use Another Procedure

Issue	Primary route	Whistleblowing may still apply when...
Personal grievance about pay, workload, leave, management style or an individual employment decision	Grievance Policy	The concern also reveals wider wrongdoing affecting others or the public interest.
Learner dissatisfaction with teaching, support, communication or programme experience	Complaints Policy	The issue suggests deliberate concealment, systemic falsification, danger, fraud or serious legal breach.
Assessment decision	Assessment Appeals Procedure	The concern is about systemic manipulation, fraudulent certification, collusion or malpractice rather than disagreement with an academic judgement.
Safeguarding or Prevent concern	Safeguarding / Prevent procedure immediately	There is also concern about cover-up, systemic failure, retaliation or deliberate non-compliance.
Bullying, harassment or discrimination affecting the reporter personally	Grievance, Dignity at Work or EDI procedure	The issue affects others or concerns sexual harassment, public safety, legal breach or concealment.
Suspected personal data breach	Data Breach Procedure immediately	There is deliberate concealment, unlawful processing, retaliation or wider public-interest wrongdoing.

Quack will not reject a disclosure simply because it was submitted under the wrong policy. The receiving manager must triage it, preserve confidentiality and route each element appropriately.

7. Funded-Training and Skills Bootcamp Examples

Examples of concerns that may be appropriate for whistleblowing include:

- deliberately falsifying learner eligibility, residency, employment status, signatures, enrolment, attendance, guided learning hours or programme dates;
- claiming public funding for learners, milestones, qualifications, interviews or employment outcomes that are not supported by valid evidence;
- fabricating, altering or concealing MS1, MS2 or MS3 evidence, employer confirmation, payslips, contracts, assessment evidence or learner declarations;
- instructing staff to backdate, create, change or destroy records to mislead a funder, auditor, awarding organisation or inspector;
- withholding known material errors from a commissioner or continuing to claim after leaders know evidence is unreliable;
- fraud, bribery, kickbacks, misuse of funds, undisclosed related-party arrangements or improper supplier payments;
- systemic safeguarding, Prevent, health and safety or professional-boundary failures, including failure to act on known risks;
- deliberate misuse of learner data, unauthorised access, concealed data breaches or unlawful sharing;
- assessment malpractice, fraudulent certification, collusion or pressure on assessors/IQAs to change valid decisions;
- misleading learners about guaranteed jobs, interviews, qualifications or funding conditions where this is deliberate or systemic;
- sexual harassment, serious discriminatory conduct or a deliberate failure to act on such concerns;
- retaliation against a person who has raised a protected or good-faith concern.

8. Principles and Protection from Detriment

- Quack encourages concerns to be raised early and will respond without requiring the reporter to prove the case.
- No person will be dismissed, disciplined, threatened, bullied, isolated, disadvantaged or otherwise subjected to detriment for making a protected or good-faith disclosure.
- Confidentiality will be protected as far as reasonably possible, subject to legal, safeguarding, fairness and investigation requirements.
- Concerns will be assessed objectively. The subject of a concern will not control the investigation or access the reporter's identity without legitimate need.
- People raising concerns may request reasonable adjustments, a support person, trade union representative or workplace companion for meetings.
- Non-disclosure, confidentiality or settlement terms must not be used to prevent lawful whistleblowing, reporting sexual harassment to the police or obtaining legal advice.
- Any alleged retaliation must be reported immediately and will be considered separately from the original disclosure.

9. How to Raise a Concern Internally

Route	When to use	How to report
Quality & Compliance Lead	Normal first route where Jessica Roughton is not implicated.	Email compliance@quackrecruitmentandtraining.co.uk with "Private and Confidential - Whistleblowing" in the subject, or request a confidential meeting.
Director of Contracts & Operations	Where the concern relates to quality/compliance, the DSL, or the reporter prefers a senior alternative.	Telephone 0333 577 0036 and request Dion Bishop, or submit sealed correspondence marked private and confidential.
Independent Governor / external governance adviser	Where Dion and/or Jessica may be implicated, the issue concerns senior leadership, or an internal route is reasonably considered unsafe.	Sealed correspondence marked "Private and Confidential - Independent Governor" to the head-office address. It must be passed unopened.
Any manager / DSL / DDSL	Where the reporter first speaks to another manager or the concern includes safeguarding.	The recipient must record the concern, preserve confidentiality and transfer it promptly to an appropriate lead without investigating personally.
External body	Where urgent, legally appropriate, the internal route is unsafe, evidence may be destroyed, or the matter falls within an external body's remit.	Use the guidance in section 17 and Appendix C.

A written disclosure is preferable but not mandatory. It should include the background, relevant dates, people involved, what is believed to be wrong, whether it has been raised before, available evidence, any immediate risk and how the reporter can be contacted. The reporter must not obtain evidence unlawfully or access records outside their normal authority.

10. Confidential and Anonymous Disclosures

- Quack will accept anonymous concerns and assess them on their substance, credibility, seriousness, specificity and available evidence.
- Anonymous reporting can make clarification, protection and feedback more difficult. Reporters are encouraged to provide a secure contact route even if they do not wish to be identified more widely.
- Where confidentiality is requested, the reporter's identity will be restricted to those who genuinely need it. Records will separate identifying information where practical.
- Absolute confidentiality cannot be guaranteed. Identity may need to be disclosed where required by law, safeguarding duties, police or regulatory action, or where fairness makes disclosure unavoidable.
- Before disclosing identity, Quack will normally discuss the position with the reporter unless doing so would increase risk, prejudice an investigation or be legally prohibited.

11. Immediate Risk and Emergency Escalation

The whistleblowing process must not delay urgent action. A person who believes someone is in immediate danger should call 999. Suspected crime may be reported to police. Safeguarding and Prevent concerns must be reported immediately to the DSL or DDSL. Serious cyber incidents or personal data breaches must be escalated immediately under the relevant procedure.

Immediate action:

Managers must first protect people, public funds, evidence and systems. This may include suspending a claim, restricting system access, securing records, separating individuals, pausing delivery, contacting emergency services or making an urgent external report. Such action is precautionary and does not predetermine the investigation outcome.

12. Triage and Conflict-of-Interest Controls

1. Acknowledge receipt normally within 2 working days, unless anonymous with no contact route.
2. Assess immediate safeguarding, Prevent, health and safety, fraud, evidence-preservation, data, criminal and funding risks.
3. Confirm whether the matter is whistleblowing, another procedure, or requires parallel procedures.
4. Identify every person who may have a conflict of interest or personal relationship relevant to the case.
5. Appoint a sufficiently independent and competent investigator. A person implicated in the concern must not appoint, direct or receive unrestricted access to the investigation.
6. Decide whether a funder, awarding organisation, insurer, regulator, police, DBS, ICO or other body must be notified immediately.
7. Create a restricted case record, investigation terms of reference, action log and communication plan.
8. Explain to the reporter how the matter will be handled, what can be shared and the expected next update.

13. Investigation Procedure

Stage	Required action	Target / evidence
Terms of reference	Define the allegations, scope, investigator, decision-maker, conflicts, evidence sources, external reporting and confidentiality controls.	Written terms of reference and conflict declaration.
Evidence preservation	Secure relevant emails, PICS records, learner files, ILR reports, registers, Teams data, employer evidence, assessment records, CCTV, financial records or devices lawfully.	Preservation log and access controls.
Reporter meeting	Clarify the concern, chronology, evidence, immediate risk and requested confidentiality.	Meeting note agreed or offered for comment.
Witness / subject meetings	Give people a fair opportunity to provide information without disclosing more than necessary.	Interview notes and supporting evidence.
Analysis	Test facts against policy, contracts, funding rules, law, safeguarding thresholds and awarding-body requirements.	Evidence schedule and findings by allegation.
Report	Set out facts, findings, limitations, risk, required notifications, corrective action and lessons learned.	Investigation report and decision record.
Timescale	Aim to conclude within 20 working days. Complex cases may take longer.	Written progress update at least every 10 working days where unresolved.

The civil standard of proof - balance of probabilities - will normally be used for internal findings. Criminal, safeguarding or regulatory bodies apply their own thresholds. An internal investigation may be paused, adapted or coordinated where an external body advises that internal action could prejudice its work.

14. Communication, Support and Accompaniment

- The reporter will be given a named contact and reasonable updates, subject to confidentiality and legal restrictions.
- The reporter may be accompanied at meetings by a colleague, trade union representative or another agreed support person.
- Reasonable adjustments will be made for disability, health, neurodiversity, language, anxiety or other access needs.
- Managers must monitor for retaliation, changed treatment, exclusion, pressure to withdraw, adverse work allocation or other detriment.
- Where appropriate, Quack may offer welfare support, EAP/Health Assured support, time to obtain advice or temporary reporting-line adjustments.
- The subject of the concern must also be treated fairly, informed appropriately and protected from premature judgement.

15. Outcome, Corrective Action and External Notification

The reporter will normally be told whether the concern was upheld, partly upheld, not upheld or could not be determined. Detailed disciplinary, personal, legal or safeguarding information may be withheld. Quack will explain, as far as reasonably possible, that appropriate action has been taken.

Possible action	Examples
Immediate control	Pause a claim, correct learner data, secure records, restrict access, protect learners or stop unsafe activity.
People action	Training, supervision, capability, disciplinary action, suspension, dismissal, contractor termination or referral.
Funding / contract action	Notify the relevant commissioner, repay or withdraw unsupported claims, correct ILR/funder returns, strengthen checks and complete a root-cause review.
Qualification action	Notify Highfield or another awarding organisation, preserve assessment evidence, suspend certification or follow malpractice sanctions.
Safeguarding / regulatory action	Referral to local safeguarding services, police, Prevent/Channel, DBS, ICO, HSE, Ofqual or another competent body where required.
Improvement action	Update the risk register, QIP, SAR, policy, training, system permissions, segregation of duties, internal audit and governance monitoring.

Leaders must not delay mandatory external notification while waiting for an internal investigation to conclude. Notification decisions, reasons and dates must be recorded.

16. Review of Handling

A reporter who believes the concern was not handled appropriately may request a review within 10 working days of receiving the outcome or closure communication. The request should identify the procedural failure, significant evidence not considered, conflict of interest, unreasonable delay or other reason for review.

- The review will be allocated to a person not materially involved in the original handling, normally the Independent Governor, external governance adviser or another competent independent person.
- The review will not automatically reinvestigate every factual issue. It will assess whether the process was fair, sufficiently thorough, independent and proportionate.
- The reviewer may uphold the handling, require further investigation, appoint a new investigator, correct the outcome or require additional external notification.
- A review response will normally be issued within 15 working days, with an update where more time is necessary.

17. External Disclosures and Prescribed Persons

Quack encourages internal reporting where safe and appropriate because it can enable rapid action. A person is not required to report internally first in every circumstance. External legal protection depends on choosing an appropriate route and meeting the relevant statutory conditions.

Body / route	Typical relevance to Quack	Important limitation
Relevant mayoral combined authority, local authority or public funder	Skills Bootcamp funding, contract delivery, milestone evidence, safeguarding, fraud or serious non-compliance.	Use the route in the relevant contract or published provider guidance.
Department for Education / ESFA whistleblowing route	Public-interest disclosures connected with DfE-funded education and training.	Check the current DfE/ESFA route and remit before disclosure.
DfE fraud allegations mailbox	Suspected fraud or financial wrongdoing at an organisation funded by DfE.	Provide sufficient specific evidence; confidentiality cannot be guaranteed in every case.
Highfield Qualifications or another awarding organisation	Assessment malpractice, certification, centre compliance or qualification integrity.	Normally follow centre and awarding-body procedures; urgent issues may require immediate notification.
Ofqual	Matters within Ofqual's qualification-regulation functions.	Ofqual is a prescribed person for matters within its statutory remit.

Body / route	Typical relevance to Quack	Important limitation
ICO	Data-protection and information-rights concerns.	The disclosure must fall within the ICO's remit.
HSE	Serious workplace health and safety concerns.	Use HSE where the matter is within its enforcement functions.
Police / Serious Fraud Office	Crime, bribery, serious fraud or immediate danger.	Emergency and criminal routes are separate from internal policy.
Legal adviser / Acas / Protect / trade union	Independent advice on rights, reporting route and protection.	Advice routes do not replace mandatory emergency reporting.
Ofsted	Ofsted is prescribed only for specified matters within its listed remit, particularly certain child welfare and social-care matters.	It is not a general whistleblowing route for every adult Skills Bootcamp or FE concern; use the correct funder, DfE or regulator route.

The current statutory list of prescribed people and bodies must be checked before an external disclosure. A person may also disclose to a legal adviser in the course of obtaining legal advice. Wider disclosure to media or social media has stricter legal tests and should not be assumed to be protected.

18. Malicious or Knowingly False Allegations

A concern raised honestly will not lead to action merely because it is mistaken, unsupported or not upheld. A person is not required to prove the allegation and may raise a concern based on reasonable belief.

Deliberately fabricating evidence or making a knowingly false allegation for an improper purpose may be considered under the relevant conduct procedure. Leaders must distinguish this carefully from a genuine concern that cannot be substantiated. The possibility of conduct action must never be used to discourage legitimate reporting.

19. Records, Confidentiality and Data Protection

- Every disclosure must be assigned a reference and entered on a restricted whistleblowing register without unnecessary personal detail.
- Case files must be separated from general HR, learner or management files and access restricted to authorised people.
- Records should include receipt, risk decisions, conflicts, communications, evidence, investigation findings, notifications, corrective action, review and closure.
- Safeguarding records must remain within the safeguarding system where appropriate, with a cross-reference rather than duplicated sensitive detail.
- Information must be shared on a strict need-to-know basis and retained in accordance with the Records Retention Policy, legal advice, funder and regulatory requirements.
- Data-subject rights apply but may be restricted where necessary to protect others, preserve confidentiality or avoid prejudicing an investigation, subject to law.
- Whistleblowing information must not be uploaded to unauthorised AI tools, personal email, personal devices or informal messaging systems.

20. Roles and Responsibilities

Role	Responsibilities	Evidence / assurance
Director of Contracts & Operations	Senior accountability; ensures independence, resources, protection from detriment, external notification and corrective action.	Decision records, action plans, notifications, governance reporting.
Quality & Compliance Lead	Operational ownership; receives disclosures, maintains restricted records, coordinates triage and monitors actions unless conflicted.	Register, terms of reference, investigation file, QIP actions.
Independent Governor / external governance adviser	Receives senior-leadership concerns, provides independent challenge and may conduct or commission reviews.	Restricted correspondence, review report, governance assurance.
DSL / DDSL	Acts immediately on safeguarding and Prevent elements and coordinates statutory referrals.	Safeguarding chronology, referral and decision records.
Managers	Recognise disclosures, preserve confidentiality, avoid informal investigation, escalate promptly and prevent detriment.	Manager referral, meeting notes, protective actions.
Investigator	Acts impartially, declares conflicts, preserves evidence, interviews fairly and produces evidence-based findings.	Conflict declaration, evidence schedule, report.
All staff and workers	Raise concerns honestly, protect confidentiality, cooperate with investigations and do not retaliate.	Training, policy acknowledgement, investigation evidence.
Governance	Reviews anonymised themes, timeliness, retaliation risk, overdue actions and systemic learning.	Governance minutes, risk register, action monitoring.

21. Monitoring, Governance and Review

Monitoring activity	Purpose	Frequency / trigger
Register review	Check receipt, triage, investigator independence, updates, closure and outstanding risk.	At least quarterly and after each case milestone.
Retaliation check	Confirm the reporter has not experienced detriment or pressure.	During the case, at closure and follow-up where appropriate.
Action verification	Confirm corrections, repayments, notifications, training and control changes are complete and effective.	After each case and through QIP/risk review.
Trend analysis	Identify repeated issues by contract, process, team, system or manager without exposing identities.	Quarterly governance and annual SAR/QIP cycle.
Policy awareness	Ensure staff know routes and managers can recognise and respond to disclosures.	Induction, annual refresher and after material change.
Policy review	Check legal, contract, funder, awarding-body and prescribed-person information remains current.	Annual review or sooner after change.

Governance reporting must be anonymised unless disclosure is necessary and lawful. The absence of recorded cases should not automatically be interpreted as evidence of a healthy culture; leaders should test whether staff know and trust the reporting routes.

Appendix A: Whistleblowing Disclosure Form

Field	Information to record
Reporter details	Name and contact details, or "anonymous". Preferred safe method and time for contact.
Confidentiality request	Whether confidentiality is requested and any specific risk if identity becomes known.
Concern	What is believed to be wrong, who is involved and why it may be in the public interest.
Dates / locations	When and where the events occurred or are expected to occur.
Evidence	Documents, records, witnesses or systems that may support or disprove the concern.
Previous reporting	Who has already been told, when, and what response was received.
Immediate risk	Risk to learners, staff, public funds, evidence, data, health and safety or the public.
Requested support	Reasonable adjustments, companion, alternate reporting line or safety measures.
Reporter declaration	The information is provided honestly and reflects the reporter's reasonable belief.

Appendix B: Triage and Investigation Checklist

- Acknowledge within 2 working days where contact details are available.
- Check immediate danger, safeguarding, Prevent, health and safety, crime, fraud, cyber and data risks.
- Preserve records and suspend vulnerable claims or system access where proportionate.
- Identify conflicts involving leaders, family members, partners, investigators or decision-makers.
- Confirm the correct procedure(s) and mandatory external notifications.
- Appoint an independent, competent investigator and issue written terms of reference.
- Agree confidentiality, communication, support and anti-retaliation controls.
- Meet the reporter and secure available evidence.
- Interview witnesses and the subject fairly and proportionately.
- Analyse each allegation against the evidence and applicable requirements.
- Issue findings, corrective action, owners and deadlines.
- Provide appropriate feedback and offer a review of handling.
- Complete external notifications, repayments, data corrections or referrals.
- Verify actions, follow up retaliation risk and close the case formally.
- Report anonymised themes and learning to governance.

Appendix C: External Reporting Guide

Before reporting externally:

Choose the body whose remit matches the concern. Record specific facts and evidence rather than speculation. Check the current GOV.UK list of prescribed people and bodies. External disclosure to media or social media has stricter conditions and may not be protected.

Current official routes and guidance:

- [GOV.UK - Whistleblowing for employees](#)
- [GOV.UK - Whistleblowing guidance for employers](#)
- [GOV.UK - Prescribed people and bodies](#)
- [Acas - Whistleblowing at work](#)
- [DfE / ESFA complaints, fraud and whistleblowing routes](#)
- [Ofqual - Contact and whistleblowing](#)

For suspected fraud or financial wrongdoing at an organisation funded by DfE, current DfE guidance identifies Allegations.Mailbox@education.gov.uk. Staff should verify the route remains current before use and follow any separate contractual notification requirement.

Appendix D: Manager Response Checklist

Do	Do not
Listen, thank the person and take the concern seriously.	Dismiss it as gossip, disloyalty or a personal attack.
Explain confidentiality honestly and record the concern accurately.	Promise absolute secrecy or no external referral.
Escalate to an unconflicted lead and protect evidence.	Investigate informally, question multiple people or alert the subject prematurely.
Check immediate safety and retaliation risk.	Wait for a written complaint before acting on urgent risk.
Allow a companion or support person where requested.	Pressure the reporter to withdraw or confront the subject directly.
Keep information need-to-know and use secure systems.	Discuss the case casually, use personal messaging or upload it to AI tools.
Maintain neutral language and avoid conclusions before evidence review.	Assume the allegation is true or malicious before investigation.
Record decisions, reasons and action owners.	Rely on memory or undocumented verbal assurances.

Appendix E: Version Control and External References

Version	Date	Owner	Summary	Next review
1.0	October 2024	Dion Bishop	Original policy focused on regulated qualifications and ESFA-funded apprenticeships.	Superseded
2.0	August 2026	Dion Bishop / Quality Team	Complete rewrite for adult Skills Bootcamps, current roles, public-interest disclosures, 2026 legal changes, funded-training examples, independent escalation, investigation, anti-retaliation and external reporting.	August 2027

This policy should be read alongside the Safeguarding, Prevent, Complaints, Grievance, Disciplinary, Dignity at Work, EDI, Counter Fraud, Malpractice and Maladministration, Data Protection, Information Security, Conflict of Interest and Records Retention policies and relevant funder / awarding-organisation procedures.

External references considered: Employment Rights Act 1996 (as amended); Public Interest Disclosure Act 1998; 2026 GOV.UK whistleblowing guidance for employers; current GOV.UK prescribed-person list; Acas whistleblowing guidance updated June 2026; DfE / ESFA complaints, fraud and whistleblowing routes; Ofqual whistleblowing guidance; relevant Skills Bootcamp contract and commissioner requirements.