

Whistleblowing Policy

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Last reviewed date: 1st September 2025

Next review date: 1st September 2026

Policy owner: Camilla Griggs

Version: 1.2

Scope

This policy applies to all employees of Varsity Training. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are also encouraged to use this policy.

This policy sets out the way in which individuals may raise concerns about wrongdoing, and how those concerns will be dealt with.

The procedure in this policy is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the organisation's grievance procedure.

Safeguarding or Prevent concerns in relation to a learner or learners should be reported in accordance with Varsity Training's Safeguarding Policy.

The organisation encourages workers to raise their concerns under this procedure in the first instance. If a worker is not sure whether or not to raise a concern, they should discuss the issue with the General Manager or the Designated Safeguarding Lead (DSL).

Legislation

The Public Interest Disclosure Act (PIDA) 1998 provides protection for workers who raise legitimate concerns about specified matters. These are known as "qualifying disclosures".

A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment of any of the above

is being, has been, or is likely to be, committed.

It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be committed; a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is Varsity Training's responsibility to ensure that an investigation takes place.

A worker who makes a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised because they have made a disclosure.

Further information can be found on the GOV.UK website – whistleblowing for employees.

Principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work.

Workers should remain vigilant for illegal or unethical conduct and report anything of that nature that they become aware of.

Where there are grounds for proceeding, any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially.

No action will be taken against anyone who makes an allegation, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.

Varsity Training will not tolerate any negative behaviour towards an individual who has reported possible wrongdoing. Anyone who feels they have been unfairly treated as a result of reporting a concern should refer to the organisation's Grievance Policy.

Internal Procedure

This procedure should be used to disclose a concern that, in the worker's honest and reasonable belief, wrongdoing has been committed, is being committed, or is likely to be committed.

Examples of wrongdoing include (but are not limited to):

- Serious breach of Varsity Training's Code of Conduct
- An unlawful or criminal offence (e.g. fraud, corruption or theft)
- A breach of a legal obligation
- A miscarriage of justice
- A disregard of legislation governing health and safety at work
- Action that has led to or could lead to environmental damage
- Breach of the Anti-bribery and Corruption Policy
- Behaviour or action that harms, or poses a risk to, the welfare of a learner or learners
- Conduct likely to harm the reputation of Varsity Training
- Deliberate covering up of information relating to any of the above

If a worker is unsure whether to raise a concern under this procedure, they should discuss the issue with the General Manager.

Victimisation of a worker for raising a qualifying disclosure will be treated as a disciplinary offence.

If misconduct is discovered as a result of an investigation, Varsity Training's disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is also a disciplinary offence.

An instruction to cover up wrongdoing is itself a disciplinary offence. Workers should not agree to remain silent, even if instructed to do so by a manager. The matter should be reported to the General Manager. Where the concern relates to a member of the senior Varsity Training team, it should be reported to the CEO.

Reporting a Concern

A worker who reasonably believes that inappropriate business conduct or activity has occurred, is occurring, or is likely to occur should, in the first instance, raise the issue with the General Manager.

Where the issue relates to the safety or welfare of a learner or learners, it should be reported in accordance with Varsity Training's Safeguarding Policy and referred to a DSL.

The worker should make it clear that they are reporting the matter under the Whistleblowing Policy.

Reporting Concerns to External Authorities (ESFA / DfE)

Where a worker reasonably believes that concerns raised internally have not been appropriately addressed, or where the concern relates to serious matters such as fraud, financial irregularity, or misuse of public funds, they may report the matter to an external authority.

For apprenticeship providers, this includes the Education and Skills Funding Agency (ESFA) and the Department for Education (DfE), which are prescribed bodies under the Public Interest Disclosure Act 1998.

Concerns that may be reported externally include (but are not limited to):

- Misuse of apprenticeship funding
- False or misleading Individualised Learner Record (ILR) data
- Non-compliance with funding rules
- Fraud, corruption, or financial malpractice
- Serious governance failures

Disclosures to the DfE can be made via the GOV.UK whistleblowing guidance:

<https://www.gov.uk/guidance/blowing-the-whistle-to-the-department-for-education>

Individuals may also report concerns to other prescribed bodies as appropriate. A full list is available on GOV.UK.

Before making an external disclosure, individuals are encouraged to seek independent advice to ensure the disclosure qualifies for protection under the Public Interest Disclosure Act. The independent whistleblowing charity Protect provides a confidential advice line.

Nothing in this policy prevents an individual from making a protected disclosure to a prescribed body.

Whistleblowing for Learners, Employers, and External Stakeholders

Varsity Training is committed to ensuring that learners, apprentices, and employer partners are able to raise concerns safely and confidently.

Learners and employers may raise concerns:

- Directly with their tutor, coach, or usual contact
- With the Designated Safeguarding Lead (DSL)
- Through Varsity Training's formal complaints procedure
- By contacting senior management where appropriate

Where concerns relate to:

- The quality of education or training
- Safeguarding, welfare, or wellbeing of learners
- Misconduct, malpractice, or serious organisational failings

Individuals may also report concerns directly to Ofsted, the independent regulator for education and training providers.

Ofsted whistleblowing can be accessed via GOV.UK:

<https://www.gov.uk/government/organisations/ofsted/about/complaints-procedure>

Ofsted may be contacted where:

- Concerns have not been resolved through internal procedures
- There are serious concerns about the safety or quality of provision
- There is a need to raise concerns independently of the organisation

Varsity Training will ensure that information about how to raise concerns is:

- Clearly communicated to learners and employers
- Accessible and easy to understand
- Reinforced through induction and ongoing training

No learner, employer, or stakeholder will be disadvantaged or treated unfairly for raising a genuine concern in good faith.

Confidentiality

Every effort will be made to ensure confidentiality and, where requested, all reasonable steps will be taken to protect the anonymity of the whistleblower. However, in certain

circumstances, the individual's identity may need to be revealed to assist with the investigation.

Concerns may also be reported anonymously. However, Varsity Training encourages individuals to raise concerns directly with senior managers to allow for more effective investigation, follow-up, and feedback.

Investigation

Once a concern has been raised, the matter will be acknowledged within 5 working days and investigated by the person to whom it was reported or, where appropriate, by another manager appointed by Varsity Training.

It is not the responsibility of the individual raising the concern to investigate the wrongdoing or gather evidence.

The investigation process may involve meetings and/or written statements. All investigations will be conducted in line with the principles set out in this policy and will be handled promptly, fairly, and confidentially.

Varsity Training will aim to complete investigations within 20 working days. Where this is not possible due to the complexity of the case, the individual who raised the concern will be kept informed of progress and provided with indicative timescales for completion.

Once the investigation is complete, the individual who raised the concern will be informed of the outcome and any further steps to be taken, subject to legal and confidentiality considerations.

If the individual is dissatisfied with the investigation or outcome, they should raise the matter with the CEO.

Record-Keeping

A written record of all whistleblowing concerns will be maintained. This will include:

- The nature of the concern raised
- The date the concern was received
- Details of the investigation undertaken
- Any actions taken and outcomes reached

Records will be held securely and confidentially in line with data protection requirements and will only be accessible to authorised personnel. These records may be used for monitoring, audit, and compliance purposes, including demonstrating adherence to regulatory requirements.

External Authorities

Where a worker reasonably believes that appropriate action has not been taken following the internal procedure, they may consider reporting the matter to an external authority.

Individuals may wish to seek independent advice before doing so, as disclosures must be made to the correct prescribed person or body to qualify for protection under the Public Interest Disclosure Act.

The independent whistleblowing charity **Protect** operates a confidential helpline.

A list of prescribed people and bodies is available on GOV.UK.

Policy Review and Contact

If you have any questions about this policy, please contact the General Manager or the Designated Safeguarding Lead (DSL).

This policy is reviewed and updated annually in line with legal obligations, business objectives, and operational needs. Staff are responsible for ensuring they are familiar with the most current version.

Further guidance on disclosures to the Department for Education (DfE) or the Education and Skills Funding Agency (ESFA) is available on GOV.UK.

Policy review

This policy will be reviewed annually.

Signed

CGriggs

Camilla Griggs

General Manager

Version log

Version	Change Detail	Effective From	Effective To	Approved By
1.2	New section: Whistleblowing for Learners, Employers, and External Stakeholders Amendments to Inspection, including details of record keeping. Policy owner updated	01/09/2025	Not set	David Maytham
1.1	Approved	01/09/2024	31/08/2025	David Maytham