


<b>Document title:</b>	Whistleblowing Policy	<b>Owner:</b>	Beverley Ellis
<b>Version Number:</b>	25-1	<b>Previous Version:</b>	23-1
<b>Date of Issue:</b>	27/11/2025	<b>Date for review:</b>	27/11/2027
This policy has been reviewed and approved by the Operations Director:		Signed...	

## 1. Policy Statement

TRS Training Ltd is committed to responsible behaviour and full compliance with applicable laws and regulations. We foster a speak-up culture in which concerns can be raised safely and investigated fairly. Retaliation against anyone who makes a protected disclosure in the public interest is prohibited. (This reflects UK whistleblowing protections under the Employment Rights Act 1996 as amended by PIDA 199

## 2. Scope of Policy

This policy applies to **all** employees, learners, employers, job applicants, contractors, subcontractors, consultants, business partners and any other parties associated with TRS Training Ltd.

## 3. TRS Values

This policy underpins our commitment to our values, with reference to:

1. **RESPOND** – Listening to our customers, partners and stakeholders and being equipped to meet their changing needs
2. **PARTNERS** – Developing sustainable partnerships where everyone involved benefits from the relationship
3. **QUALITY** – Providing outstanding teaching, learning and customer service
4. **SUPPORT** – A strong ethos of care, guidance and support

## 4. Definitions & Qualifying Disclosures

4.1. A *protected disclosure* is a disclosure of information where the worker reasonably believes it is in the public interest and it tends to show one or more of the following:

- A criminal offence has been, is being, or is likely to be committed;
- A person has failed to comply with a legal obligation;
- A miscarriage of justice has occurred, is occurring, or is likely to occur;
- Health or safety of any individual has been, is being or is likely to be endangered;
- The environment has been, is being, or is likely to be damaged;
- Concealment of information relating to any of the above;
- Fraudulent activity;
- Activities relating to safeguarding, radicalisation or terrorism, or compromising our commitment to British Values;

- Insufficient or ineffective management of a safeguarding referral;
- Breaches of UK financial, trade, or transport sanctions

4.2. Disclosures must be made through proper channels for protection to apply; exceptions include disclosures that would themselves be unlawful or legally privileged.

## 5. Implementation Principles

- 5.1. We listen to concerns and investigate objectively and confidentially; individuals are not required to obtain proof before raising issues.
- 5.2. Malicious or knowingly false allegations may lead to appropriate action.
- 5.3. The individual should raise concerns with **Samantha Heap, HR Officer** first, who will deal with the matter objectively.
- 5.4. Workers who make protected disclosures are protected from dismissal and detriment. Compensation in dismissal cases is uncapped.
- 5.5. All matters are treated **confidentially**; identity is protected where possible. Individuals will **not** suffer detriment for making protected disclosures in good faith. Malicious false allegations may result in appropriate action.
- 5.6. The individual must show that they have a reasonable belief that the information disclosed demonstrates one or more of the above criteria. However, there are two important exceptions where the Disclosure will not qualify for protection and they are: if the person making the Disclosure commits an offence by making it or it is a matter in which a legal, professional privilege would apply, namely, correspondence between the employer and their lawyers regarding a specific case.
- 5.7. The protection applies to all individuals without any restriction on age, however, it is limited, and it is important that the individual follows the correct procedure or else they will be denied the protection.
- 5.8. The protection, which financial compensation without the statutory cap applying in the case of protection against dismissal, further includes the right not to suffer a detriment because of making a protected Disclosure.

## 6. Reporting Routes

### 6.1. Internal (preferred):

Raise concerns with your line manager or the Named Person below.

### 6.2. Named Person for Whistleblowing:

Samantha Heap, HR Officer - [samanthah@trstraining.net](mailto:samanthah@trstraining.net)

### 6.3. OFSTED:

0300 1233155

email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk).

write to: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD.20

## 6.4. Department for Education

0370 000 2288 Monday to Friday, 9am to 5pm

email: [customer.complaints@education.gov.uk](mailto:customer.complaints@education.gov.uk)

write to: Customer Service Team, Department for Education, Cheylesmore House, Quinton Road, Coventry CV1 2WT

## 7. Roles and Responsibilities

- 7.1. The Board approves and reviews this Policy; monitors effectiveness; addresses allegations.
- 7.2. Managers implement the Policy; ensure staff understanding; monitor practice; act as or support the Named Person; escalate appropriately.
- 7.3. Staff implement policy principles; behave exemplarily; participate in training; report concerns to the Named Person

## 8. Policy Monitoring and reporting arrangements

- 8.1. The Board is responsible for monitoring the application and effectiveness of this policy.
- 8.2. Staff are asked for their feedback on the whistleblowing process and this is evaluated and reported at Board meetings and considered as part of the self-assessment process. Arising areas for improvement are included within the Quality Improvement Plan.
- 8.3. This policy is reviewed bi-annually.

## 9. Summary of revisions

Version No	Date	Revision
25-1	26/11/2025	Updates of legislation to Public Interest Disclosure(Prescribed Persons) (Amendment) Order 2025
25-1	26/11/2025	Updates to DfE and Ofsted points of contact
23-1	21/12/2023	Change of logo and fonts
23-1	21/12/2023	Inclusion of clause 4.9

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## APPENDIX 1 – WHISTLEBLOWING PROCEDURE

1. In order to qualify for the whistle-blowing protection, the individual must use one of the six specified ways to make the Disclosure. The aim of the legislation is to encourage individuals to disclose the information through appropriate internal channels first rather than going directly to an outside person such as a member of the media.
2. The six permitted ways of Disclosure are as follows:
  - 2.1. **Disclosure to an Employer or Other Responsible Person** - This method of Disclosure will ensure that whistleblowers are protected in respect to Disclosures made in good faith. Where the whistleblower believes that the relevant failure relates solely or mainly to the conduct of a person other than the employer or to a matter for which that other person has responsibility, the Disclosure should be made to that other person.
  - 2.2. **Disclosure to a Legal Adviser** - This protects whistleblower who disclose information in the course of obtaining legal advice.
  - 2.3. **Disclosure to a Minister of the Crown** - This will only apply where the whistleblower's employer is an individual appointed under any enactment by a Minister of the Crown or a body whose members are so appointed. Examples include the Utility Regulatory Bodies and NHS trusts, i.e. could apply to nurses, care staff and workers supplied to local authorities.
  - 2.4. **Disclosure to a Prescribed Person** - Whistleblowers will qualify for protection when they make a Disclosure in good faith to a person prescribed by an order made by the Secretary of State.
  - 2.5. **Disclosure in Other Cases** - Disclosure in other cases apply where the whistleblower makes the Disclosure in good faith, reasonably believes that the information disclosed and any allegations contained within it are substantively true, does not make the Disclosure for the purposes of personal gain and meets one of the specified conditions set out below, namely:
    - that at the time he or she makes a Disclosure, the whistleblower reasonably believes that he or she will be subject to detriment by his or her employer if that whistleblower makes a Disclosure to his or her employer or to a prescribed person;
    - that in the case where no person is prescribed in relation to the relevant circumstances, the whistleblower reasonably believes that it is likely that the evidence relating to the relevant failure would be concealed or destroyed if he or she made the Disclosure to the employer; or
    - that the whistleblower has previously made a Disclosure of substantially the same information to the employer or a prescribed person. Further details are contained within the Act.
  - 2.6. Individuals who would like to make a disclosure to OFSTED should do so at:  
0300 1233155  
email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk).  
write to: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD.20

### 2.7. Department for Education

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0370 000 2288 Monday to Friday, 9am to 5pm

email: [customer.complaints@education.gov.uk](mailto:customer.complaints@education.gov.uk)

write to: Customer Service Team, Department for Education, Cheylesmore House, Quinton Road,  
Coventry CV1 2WT

### 3. **Disclosure of Exceptionally Serious Breaches**

The final type of protected Disclosure is one which covers situations where the subject matter is serious enough to merit by-passing one of the other procedures. The relevant criteria set out above must be met together with the matter which must be exceptionally serious. It does not mean that people will be protected where they act unreasonably, for example, by going straight to the press where there would clearly have been other less damaging ways to resolve the matter.