

Document title:	Whistleblowing Policy	Owner:	Beverley Ellis
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Date of Issue:	17/08/2026	Date for review:	17/08/2028
This policy has been reviewed and approved by the Operations Director:			Signed...  .

1. Policy Statement

- 1.1. TRS Training Ltd is committed to maintaining the highest standards of integrity, honesty, openness and accountability in all its activities. We encourage employees and other stakeholders to speak up where they have genuine concerns regarding wrongdoing, malpractice, fraud, safeguarding failures, financial irregularity or risks to learners, staff, public funds or the organisation.
- 1.2. TRS recognises that individuals may sometimes be the first to become aware of concerns occurring within the organisation. We are committed to creating a culture in which concerns can be raised openly, safely and without fear of retaliation.
- 1.3. No individual will suffer dismissal, disciplinary action, detriment, victimisation, harassment or any other disadvantage because they have made a protected disclosure in accordance with this policy.
- 1.4. TRS supports the principles of:
 - Transparency
 - Ethical conduct
 - Good governance
 - Effective safeguarding
 - Protection of public funds
 - Compliance with legal and regulatory requirements
- 1.5. This policy should be read alongside:
 - Anti-Bribery, Corruption, Fraud, Error and Conflicts of Interest Policy
 - Safeguarding and Prevent Policy
 - Grievance Policy
 - Staff Code of Conduct
 - Data Protection Policy
 - Complaints Policy

2. Scope of Policy

This policy applies to d employees, directors, associates, apprentices, learners, employers, job applicants, contractors, subcontractors, consultants, volunteers, business partners and any person carrying out work on behalf of TRS.

3. TRS Values

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

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

4. Our Commitment

TRS will:

- Treat disclosures seriously.
- Investigate concerns fairly and objectively.
- Protect confidentiality wherever reasonably possible.
- Protect whistleblowers from retaliation.
- Take appropriate corrective action.
- Report matters to regulatory or statutory authorities where required.
- Learn lessons from concerns raised.

5. What is Whistleblowing?

5.1. Whistleblowing is the disclosure of information where an individual reasonably believes:

- The information shows wrongdoing has occurred, is occurring or is likely to occur; and
- Disclosure is in the public interest.

5.2. A concern may qualify for protection if it relates to:

- Criminal offences including theft, fraud, corruption, bribery or financial crime.
- Failure to comply with legal obligations: Including regulatory or contractual breaches.
- Miscarriage of justice
- Health and safety risks to learners, staff, visitors or the public.
- Safeguarding concerns including abuse, neglect, exploitation, radicalisation or ineffective safeguarding practice.
- Environmental damage
- Financial irregularity including misuse of public funds or funding rule breaches.
- Fraud or error including funding fraud, learner eligibility fraud, falsified learner records, payroll fraud, procurement fraud
- Conflicts of interest where undeclared interests may compromise integrity or decision-making.
- Concealment attempts to conceal any of the matters listed above.

5.3. The following should normally be raised through other procedures:

- Personal employment disputes
- Pay concerns
- Bullying complaints affecting only an individual
- Requests for flexible working
- General dissatisfaction with management decisions

These should normally be handled through the Grievance Policy unless there is a wider public interest element.

6. Principles of Protection

- 6.1. Individuals do not need proof of wrongdoing before raising concerns. Individuals only need a reasonable belief that the information disclosed indicates wrongdoing.
- 6.2. Individuals will be protected if they make a disclosure honestly and reasonably, even if the concern subsequently proves to be unfounded.
- 6.3. TRS will not tolerate any of the following towards any individual who raises a concern under this policy:
 - Victimisation
 - Retaliation
 - Harassment
 - Bullying
 - Intimidation
- 6.4. Any employee engaging in retaliation may face disciplinary action up to and including dismissal.
- 6.5. Deliberately false or malicious allegations may result in disciplinary action.

7. How to Raise a Concern

- 7.1. Where possible, concerns should first be raised internally. Concerns may be reported to:
 - Line Manager
 - HR Officer
 - Operations Director
 - Managing Director
 - 7.2. Named Whistleblowing Contact
 - Samantha Heap, HR Officer
 - Email: samanthah@trstraining.net
 - 7.3. Where the concern involves line management, senior management, HR or Directors, concerns may be raised directly with:
 - Chair of the Board
 - Department for Education
 - Ofsted
 - Awarding Organisation
 - Relevant regulator
 - 7.4. Where possible, disclosures should include:
 - Nature of concern
 - Relevant dates
 - Names of individuals involved
 - Supporting information or evidence
 - Details of any previous reporting
- A concern may still be raised if some information is unavailable.

8. Investigation Process

8.1. TRS will normally acknowledge receipt of the disclosure within five working days where contact details are available. An initial review will normally take place within ten working days to determine the seriousness of the concern, whether immediate action is required and the most appropriate investigation route

8.2. TRS may:

- Undertake an internal investigation
- Appoint an independent investigator
- Refer the matter to external specialists
- Refer the matter to regulators or enforcement agencies

8.3. TRS aims to conclude investigations promptly and normally within thirty working days, although complex investigations may take longer.

8.4. Where possible, the whistleblower will be informed:

- That the investigation has concluded
- Whether the concern was upheld
- Whether appropriate action has been taken

Confidentiality and legal restrictions may limit information that can be shared.

9. Confidentiality and Anonymous Disclosures

9.1. TRS will protect the identity of whistleblowers wherever reasonably practicable.

- Information will only be shared where necessary eg to investigate concerns, to meet legal obligations, to protect learners or staff, to support regulatory investigations

9.2. Anonymous disclosures will be considered, although investigations may be more difficult where contact details are unavailable.

10. External Reporting Routes

Individuals may report concerns directly to prescribed external bodies where appropriate.

- **Department for Education:** Individuals may disclose concerns directly in accordance with DfE guidance on: **Blowing the Whistle to the Department for Education:** <https://www.gov.uk/guidance/blowing-the-whistle-to-the-department-for-education>
- **Ofsted:** Telephone: 0300 123 3155
Email: whistleblowing@ofsted.gov.uk
Address: WBHL, Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD
- **Protect:** Protect provides free and confidential whistleblowing advice.
Website: <https://protect-advice.org.uk>
- **Other Reporting Bodies:** Depending on the nature of the concern, disclosures may also be made to:
 - Police
 - Action Fraud
 - Information Commissioner's Office
 - Health and Safety Executive

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- Awarding Organisations
 - Funding bodies
 - Professional regulators

11. Fraud, Financial Irregularity and Public Funds

TRS is committed to protecting public funds and ensuring compliance with DfE funding requirements. Concerns relating to the following should be reported immediately.

- Fraud
- Theft
- Bribery
- Corruption
- Funding irregularities
- Learner evidence
- Funding claims
- Conflicts of interest
- Financial misconduct

TRS may notify:

- Department for Education
- External Auditors
- Awarding Organisations
- Action Fraud
- Police
- Local authorities

12. Roles and Responsibilities

12.1. The Board shall:

- Approve and review this policy.
- Promote a positive speaking-up culture.
- Monitor significant disclosures.
- Review trends and outcomes.
- Ensure appropriate governance arrangements are maintained.

12.2. The Managing Director shall:

- Ensure effective implementation.
- Monitor investigations.
- Ensure significant concerns are escalated appropriately.
- Ensure fraud and financial irregularities are reported where required.

12.3. Managers shall:

- Encourage concerns to be raised.
- Respond promptly to disclosures.
- Maintain confidentiality.
- Escalate concerns appropriately.

12.4. Individuals shall:

- Raise concerns responsibly.
- Cooperate with investigations.
- Provide information honestly.
- Respect confidentiality during investigations.

13. Monitoring and Review

- 13.1. TRS shall maintain a confidential Whistleblowing Register
- 13.2. The Board will receive periodic anonymised reports regarding, number of disclosures, types of concerns raised, investigation outcomes, lessons learned, corrective actions implemented
- 13.3. Whistleblowing arrangements will form part of TRS's governance, risk management and compliance framework.
- 13.4. This policy will be reviewed every two years or sooner if legislation changes, DfE guidance changes, funding requirements change or significant concerns arise

14. Summary of revisions

Version No	Date	Revision
26-1	01/01/2026	Full rewrite to align with Employment Rights Act 1996, Public Interest Disclosure Act 1998, DfE Financial Handbook for Independent Training Providers and DfE Whistleblowing Guidance
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

WHISTLEBLOWING PROCEDURE

1. Purpose

This procedure explains how concerns can be raised under the TRS Whistleblowing Policy and how they will be handled. Whistleblowing applies where an individual reasonably believes that information disclosed is in the public interest and indicates wrongdoing, malpractice, risk, illegality or misconduct. Individuals do not need proof before raising a concern, but should have a reasonable belief that the information provided is true.

2. Raising a Concern

Where possible, concerns should be raised internally in the first instance. Concerns may be reported to:

- A Line Manager
- The HR Officer
- The Operations Director
- The Managing Director

Where an individual believes that these routes are not appropriate, or the concern involves senior management, they may report concerns to an external prescribed body.

3. External Reporting Routes

Protected disclosures may be made to appropriate external bodies where permitted by whistleblowing legislation. These may include:

- Department for Education (DfE)
- Ofsted
- Awarding Organisations
- Police
- Action Fraud
- Health and Safety Executive
- Information Commissioner's Office
- Other prescribed regulators

Department for Education

Guidance on making disclosures directly to DfE is available at:

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

Ofsted

Telephone: 0300 123 3155

Email: whistleblowing@ofsted.gov.uk

Address: WBHL

Ofsted

Piccadilly Gate

Store Street

Manchester

M1 2WD

Independent Advice

Free confidential advice is available from:

Protect

<https://protect-advice.org.uk>

4. Investigation Process

Upon receipt of a disclosure, TRS will normally:

- Acknowledge receipt within five working days where contact details are available.
- Conduct an initial assessment.
- Determine whether further investigation is required.
- Appoint an independent investigator where appropriate.
- Maintain confidentiality wherever reasonably practicable.
- Take corrective action where concerns are substantiated.
- Investigations will normally be completed within thirty working days, although complex matters may take longer.

5. Protection for Whistleblowers

6. TRS will not tolerate:

- Victimisation
- Retaliation
- Harassment
- Disciplinary action
- Dismissal
- Any other detriment

against an individual who raises a concern or makes a protected disclosure.

Any employee found to have retaliated against a whistleblower may be subject to disciplinary action up to and including dismissal.

7. Confidentiality

TRS will protect the identity of a whistleblower wherever reasonably possible. Anonymous concerns will be considered, although investigation may be more difficult where contact details are unavailable.

8. Exceptionally Serious Concerns

In exceptional circumstances, where an individual reasonably believes that:

- there is an immediate or serious risk;
- evidence may be concealed or destroyed;
- they would suffer detriment if concerns were raised internally; or
- previous concerns have not been appropriately addressed,

a disclosure may be made directly to an appropriate prescribed person or regulatory body in accordance with whistleblowing legislation.

Public disclosures, including disclosure to the media, are protected only in limited circumstances specified by law and should normally be considered a last resort.