Public Interest Disclosure (Whistleblowing) Policy	
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Policy prepared by	Director of Quality, Compliance & Excellence
Policy Approved by	Educationwise Board
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Purpose

Educationwise is committed to being open, honest and accountable.

This policy explains how serious concerns about wrongdoing can be raised and how Educationwise will respond.

People should feel able to speak up where they believe something is seriously wrong without fear of being treated unfairly for doing so.

A person does not need to prove that wrongdoing has taken place before raising a concern.

Statutory basis

This policy reflects the Public Interest Disclosure Act 1998 and the whistleblowing provisions of the Employment Rights Act 1996, as amended.

Where this policy and the law differ, the law applies.

Scope

This policy is available to:

- Employees
- Workers
- Apprentices
- Associates
- Agency workers
- Contractors
- Learners
- Volunteers
- Subcontractors
- Suppliers
- Employers and business partners

This policy also applies to people whose relationship with Educationwise has ended.

Educationwise encourages anyone connected with the organisation to raise a serious concern.

Legal whistleblowing protection applies to people who meet the definition of a worker under whistleblowing law and make a qualifying protected disclosure. Apprentices are included within the legal protection. Some other people, such as volunteers or learners who are not workers, may not have the same statutory protection.

Educationwise will still take genuine concerns from these individuals seriously and will not treat them unfairly for raising a concern.

What is whistleblowing?

Whistleblowing is when a worker reports information about wrongdoing that they reasonably believe is in the public interest.

This normally means that the concern affects other people, such as colleagues, learners, employers or members of the public, rather than being only a personal issue.

For legal protection to apply, the worker must reasonably believe that the information shows that wrongdoing has happened, is happening or is likely to happen and must raise the concern through an appropriate route.

A person does not need to use the words **"whistleblowing"**, **"protected disclosure"** or **"formal"** for a concern to be considered under this policy.

A concern may be raised verbally, during a meeting or conversation, or in writing.

What can be reported?

A whistleblowing concern may relate to:

- A criminal offence
- A failure to meet a legal obligation
- A miscarriage of justice
- A risk to someone's health or safety
- Damage to the environment
- Sexual harassment
- Deliberate concealment of information about any of the above

Sexual harassment has been a specific qualifying disclosure under whistleblowing law since 6 April 2026, where the relevant legal tests are met.

Examples of concerns relevant to Educationwise could include:

- Fraud or theft
- False or dishonest funding claims
- Misuse of public money
- Bribery or corruption
- Serious financial malpractice
- Deliberate falsification of learner or assessment records
- Serious breaches of funding requirements
- Serious health and safety concerns
- Serious safeguarding failures
- Sexual harassment
- Modern slavery or exploitation
- Serious data protection or security breaches
- Criminal activity
- Serious malpractice within subcontracted provision
- Deliberately hiding wrongdoing
- Attempts to stop someone raising a legitimate concern

Not every mistake or breach of a procedure will amount to whistleblowing. Educationwise will consider the seriousness, circumstances and wider impact of the concern.

Whistleblowing and personal complaints

Whistleblowing is different from a personal complaint or grievance.

A personal employment issue will normally be dealt with under the Grievance Policy. This may include:

- A disagreement with a manager
- A personal pay issue
- A dispute about working arrangements
- A personal employment decision
- A concern only about how an individual has been treated

A learner complaint about their own course or service will normally be managed through the Learner Appeals and Complaints Policy and Procedures.

However, an issue may still amount to whistleblowing where it raises a wider concern that affects other people or the public interest.

Some concerns may contain both a personal grievance and information that could amount to whistleblowing. Where this happens, the relevant processes may run alongside each other.

Educationwise will decide which process is most appropriate and will explain this to the person raising the concern.

Safeguarding concerns

Safeguarding concerns should be reported immediately through Educationwise's safeguarding arrangements.

This includes concerns about:

- Abuse
- Neglect
- Exploitation
- Sexual harm
- Domestic abuse
- Criminal exploitation
- Online harm
- Radicalisation
- Risk of serious harm

A person raising a concern does not need to decide whether it is a safeguarding concern, whistleblowing concern or both.

Educationwise will make sure it is passed to the correct person and managed appropriately.

The whistleblowing process must not delay urgent safeguarding action.

How to raise a concern

A concern can be raised verbally or in writing.

People do not have to raise the concern with their manager or tutor first if they do not feel comfortable doing so.

Concerns can be raised through any of the following routes.

Tutor or manager

A learner may speak to their tutor and a member of staff may speak to their line manager or another manager.

Where a concern may amount to whistleblowing, the person receiving it should make a factual record and pass it to the Whistleblowing Contact and, where appropriate, People and Culture as soon as reasonably practicable, normally within one working day.

The person receiving the concern should not attempt to investigate it themselves.

Whistleblowing Contact

Concerns can be raised directly with:

Nick Preston
Director of Quality, Compliance & Excellence
npreston@education-wise.org
0117 379 0450

People and Culture

Concerns can also be sent to:

hr@education-wise.org

This route may be used where the concern relates to employment or where someone does not feel able to contact the Whistleblowing Contact.

Chief Executive Officer

Where a concern involves the Whistleblowing Contact, or it would not be appropriate for them to handle the concern, it should be raised with the Chief Executive Officer.

Chair of the Board

Where a concern involves the Chief Executive Officer or there is another serious conflict of interest, the concern can be raised with the Chair of the Board.

Accessibility

Educationwise will make sure that anyone who wants to raise a concern is able to do so.

Reasonable adjustments and support will be provided where needed, and a person does not need to explain why in order to ask.

What information should be provided?

The person should provide as much information as they reasonably can, including:

- What has happened or may happen
- Who may be involved
- When it happened
- Where it happened
- Who may be affected
- Why they are concerned
- Whether there is an immediate risk
- Any information or documents already available
- Whether they have raised the concern before

A person does not need to have evidence to prove the concern before reporting it.

They should not investigate the matter themselves or access information they would not normally be authorised to access.

Confidentiality

Educationwise will protect the identity of a person raising a concern as far as reasonably possible.

Information will only be shared with people who need it to:

- Consider the concern
- Protect someone from harm
- Complete an investigation
- Meet a legal or funding requirement
- Seek professional advice
- Report the matter to an appropriate authority

Complete confidentiality cannot always be guaranteed.

Where possible, Educationwise will explain if the person's identity needs to be shared and why.

Information will be handled in line with Educationwise's Data Protection Policy.

Confidentiality agreements

No contract, settlement agreement or confidentiality agreement can prevent a person from making a protected disclosure.

Educationwise will not use or seek to rely on any confidentiality provision to prevent a person from making a protected disclosure.

Anonymous concerns

Concerns can be raised anonymously.

Educationwise will consider an anonymous concern based on:

- The seriousness of the issue
- The information provided
- Whether someone may be at risk
- Whether the information can reasonably be checked
- Whether other evidence is available

Anonymous reporting may make it harder to:

- Ask further questions
- Check information
- Keep the person updated
- Fully investigate the concern

Where possible, people are encouraged to provide a safe way for Educationwise to contact them.

Initial response

Where contact details are available, Educationwise will normally acknowledge the concern in writing within five working days.

An initial review will consider:

- Whether anyone is at immediate risk
- Whether safeguarding action is required
- Whether evidence needs to be protected
- Whether the matter may be whistleblowing
- Whether another Educationwise policy also applies
- Who should review or investigate the concern
- Whether there is a conflict of interest
- Whether external advice or reporting is required

Serious or urgent action may be taken immediately where required.

Conflicts of interest

Any actual or potential conflict of interest must be identified and managed at the start of the process and reviewed if circumstances change.

A person who is the subject of, or materially involved in, a disclosure must not:

- Investigate the concern
- Advise on the investigation or outcome
- Decide the outcome
- Attempt to resolve the concern directly with the person who raised it

Another appropriate person will be appointed where a conflict exists.

Where a concern involves the Chief Executive Officer, it will be referred to the Chair of the Board.

Investigating concerns

Educationwise will respond to concerns fairly and proportionately.

Depending on the issue, Educationwise may:

- Carry out an internal review
- Appoint another manager
- Use external People and Culture support
- Use an independent investigator
- Refer the concern to the safeguarding team
- Refer a fraud concern through the Fraud and Error arrangements
- Use another appropriate internal procedure
- Contact a funder, regulator or Awarding Organisation
- Contact the police or another authority
- Take immediate action to protect people, information or public funds

The person handling the concern should be independent of the issue wherever reasonably possible.

Informal enquiries or asking someone for an explanation are not necessarily the same as an investigation. Where an investigation is required, the relevant evidence will be considered and the steps taken will be appropriately recorded.

During an investigation

An investigation may include:

- Reviewing relevant records
- Speaking to the person who raised the concern
- Speaking to relevant staff or other people
- Reviewing learner, assessment or financial information
- Seeking specialist advice
- Reviewing policies, contracts or funding requirements

The person who raised the concern is not responsible for proving that wrongdoing took place.

Educationwise will focus on the information available and reach a fair decision.

The person a concern is about

Being the subject of a concern does not mean that a person has done anything wrong.

Educationwise will treat them fairly, tell them about the concern at an appropriate point unless there is good reason not to, and give them a fair opportunity to respond before a decision is reached.

They must not approach the person who raised the concern or try to resolve it directly.

Timescales

Educationwise will deal with concerns without unnecessary delay.

We will normally:

- Acknowledge the concern in writing within five working days where contact details are available
- Start an initial review promptly
- Explain how the concern will be handled where possible
- Aim to complete an investigation within 30 working days where reasonably practicable
- Provide reasonable updates where an investigation takes time
- Explain where more time is required
- Confirm when the matter has been completed where possible

A fixed investigation timescale will not apply to every case.

Complex concerns may take longer where:

- Several people or organisations are involved
- External information is required
- A regulator or police investigation is taking place
- Specialist advice is needed
- Safeguarding restrictions apply
- Other circumstances make additional time reasonable

Where an investigation is likely to take longer than expected, Educationwise will normally explain this to the person who raised the concern where contact details are available and it is appropriate to do so.

Outcome

Where contact details are available, Educationwise will normally provide a written outcome when the matter has been completed.

The person who raised the concern will normally be told:

- Whether the concern has been considered
- Whether it was substantiated, partly substantiated or not substantiated where it is appropriate to say so
- Whether action has been taken
- Whether it has been referred elsewhere
- Whether the matter has been closed
- Who they can contact if they remain concerned

Educationwise may not be able to share:

- Personal information about another person
- Details of disciplinary action
- Confidential safeguarding information
- Information relating to another investigation

- Commercially sensitive information
- The full investigation report

Educationwise will provide as much information as it reasonably and lawfully can.

Action following a concern

Depending on the outcome, Educationwise may:

- Take no further action
- Change a policy or process
- Correct records
- Provide staff training or guidance
- Improve controls
- Take safeguarding action
- Take disciplinary action
- Take action under a subcontract or supplier agreement
- Recover or correct funding
- Report the matter to an external organisation
- Add or update an organisational risk
- Add actions to the Quality Improvement Plan
- Report significant matters through the appropriate governance arrangements

Protection from unfair treatment

Educationwise will not tolerate anyone being treated unfairly because they have raised a genuine concern or protected disclosure.

Examples of unfair treatment or detriment may include:

- Bullying or harassment
- Threats
- Being deliberately excluded
- Unreasonable changes to duties, responsibilities or working arrangements
- Unjustified increases in scrutiny
- Pressure to withdraw a concern
- Poor treatment during learning or employment
- Unfairly removing opportunities or responsibilities
- Ending a relationship because a concern was raised

Workers who make a qualifying protected disclosure are legally protected from detriment. Employees are also protected from dismissal because they have made a protected disclosure.

Raising a concern does not prevent Educationwise from continuing normal and reasonable management activity.

Performance can still be managed, work can still be allocated and appropriate employment decisions can still be made. However, decisions must be fair and must not be influenced by the fact that a person has raised a concern.

Where appropriate, the reasons for significant decisions affecting a person who has raised a concern should be recorded at the time the decision is made.

People and Culture should normally be consulted before making a significant change to duties, reporting arrangements or objectives where there is an active whistleblowing case.

Any concern about retaliation should be raised promptly with the Whistleblowing Contact, Chief Executive Officer, People and Culture or Chair of the Board.

Support

Raising a serious concern can be difficult. Educationwise will offer appropriate support to anyone who does so, proportionate to the circumstances.

Follow-up after a concern

Closing an investigation does not remove Educationwise's responsibility to protect a person from retaliation or detriment.

Where appropriate, People and Culture or the Whistleblowing Contact may carry out proportionate follow-up after a case has closed to check:

- Whether the person has experienced any retaliation or detriment
- Whether agreed actions have been completed
- Whether any further support is needed
- Whether there are wider lessons for Educationwise

The level and timing of any follow-up will depend on the circumstances and risk of the case.

Concerns that are not upheld

No action will be taken against someone simply because a genuine concern is not upheld.

A person may raise a concern which later turns out to:

- Be incorrect
- Have another explanation
- Have insufficient evidence
- Be better dealt with under another procedure

This does not mean they were wrong to raise it.

A person should not knowingly provide false information or deliberately alter or invent evidence.

Where someone knowingly makes a false or malicious allegation, action may be considered under the appropriate disciplinary, learner or contractual procedure.

Apprentices and learners

Apprentices and learners may raise concerns about:

- Educationwise
- Their programme
- Their workplace
- Their employer
- A member of Educationwise staff
- A subcontractor
- Another learner
- Assessment activity
- Funding arrangements
- Safeguarding

Apprentices may also be able to use their employer's whistleblowing arrangements.

Where a concern relates to an apprentice's workplace, Educationwise may:

- Support the apprentice
- Involve the safeguarding team
- Help identify the correct reporting route
- Raise the matter with the employer where appropriate and safe
- Contact an external organisation
- Consider any impact on the apprenticeship

Learners who are not legally classed as workers may not receive statutory whistleblowing protection. Educationwise will still take their concerns seriously.

External reporting

A worker may choose to report a whistleblowing concern outside Educationwise.

Whistleblowing law identifies organisations known as prescribed persons. The correct prescribed person depends on the type of concern.

Possible external organisations include:

- Department for Education
- Information Commissioner's Office
- Health and Safety Executive
- HM Revenue and Customs
- Equality and Human Rights Commission
- Relevant regulators or law-enforcement agencies

A person does not have to complete Educationwise's internal process before making a protected disclosure through an appropriate external route.

Anyone considering making an external disclosure should check that they are reporting it to the correct organisation for the type of concern involved.

Extra legal tests may apply where information is disclosed more widely, such as to the media or on social media. A person considering this should seek independent advice.

Independent advice

Confidential and independent whistleblowing advice is available from **Protect**, the UK whistleblowing charity.

Advice line: 020 3117 2520

Advice may also be obtained from:

- ACAS
- A trade union
- A solicitor
- Citizens Advice
- An appropriate professional body

Records and data protection

Educationwise will maintain a central record of whistleblowing concerns, overseen by the Whistleblowing Contact.

Records may include:

- The concern raised
- Key dates
- The person responsible for handling the concern
- Information provided
- Initial risk decisions
- Conflicts of interest identified
- Investigation information
- Actions taken
- External advice or referrals
- Outcomes
- Updates provided
- Follow-up activity
- Lessons learned

Records will be:

- Accurate
- Factual
- Stored securely
- Restricted to appropriate people
- Retained in line with Educationwise's Records Retention Schedule

Information will be handled in line with the Data Protection Policy.

The level of information recorded will be proportionate to the nature and seriousness of the concern.

Roles and responsibilities

Chief Executive Officer

The Chief Executive Officer is responsible for:

- Supporting an open reporting culture
- Ensuring suitable arrangements are in place
- Considering serious concerns
- Ensuring conflicts of interest are managed
- Supporting appropriate investigations
- Escalating significant matters to the Board

Whistleblowing Contact

The Whistleblowing Contact is responsible for:

- Receiving concerns
- Completing or arranging an initial review
- Considering immediate risks
- Managing confidentiality
- Identifying conflicts of interest
- Arranging appropriate investigation
- Maintaining the whistleblowing record
- Providing updates where possible
- Escalating serious concerns
- Identifying lessons or wider risks
- Ensuring an appropriate outcome is communicated where possible

Managers and tutors

Managers and tutors are responsible for:

- Listening to concerns
- Taking them seriously
- Making an appropriate factual record
- Passing possible whistleblowing concerns to the Whistleblowing Contact and, where appropriate, People and Culture as soon as reasonably practicable
- Not promising complete confidentiality
- Protecting relevant information
- Avoiding unnecessary investigation themselves
- Supporting the person raising the concern
- Reporting any retaliation or suspected detriment

People and Culture

People and Culture may:

- Receive concerns
- Provide procedural advice
- Support investigations
- Advise on employment matters
- Help manage conflicts of interest
- Support appropriate follow-up after a concern
- Advise where employment decisions affect someone who has raised a concern

Monitoring and governance

Educationwise will monitor the effectiveness of this policy.

This may include reviewing:

- The number and type of concerns
- How concerns were handled
- Timeliness
- Any repeated themes
- Actions arising
- Reports of retaliation or detriment
- Whether policy or process changes are needed

The Board will receive proportionate and anonymised assurance on whistleblowing at appropriate intervals.

This may include:

- Significant concerns
- Themes or repeated issues
- Timeliness
- Reports of retaliation or detriment
- Actions or improvements arising

Significant issues may also be reported through the appropriate Educationwise governance arrangements, including:

- Senior Leadership Team
- Fraud and Error Committee
- Safeguarding and Prevent Committee
- Relevant risk registers
- Master Risk Committee
- Board

Only information needed for appropriate oversight will be shared.

Awareness

Educationwise will make sure staff understand:

- What whistleblowing is
- What types of concerns can be raised
- Who they can contact
- That they do not have to raise a concern with their manager first
- That a concern does not have to be labelled as whistleblowing
- How confidential and anonymous concerns are handled
- That retaliation is not acceptable
- Where independent advice can be obtained

Whistleblowing arrangements will form part of appropriate staff induction, guidance and awareness activity.

Learners will also have access to clear information about how to raise serious concerns.

Others within the scope of this policy will be made aware of it through induction, contractual arrangements or other appropriate means.

This policy will be published where the people within its scope can readily find it.

Related policies

This policy should be read alongside:

- Counter Fraud and Error Policy
- Ethics and Anti-Bribery Policy
- Conflict of Interest Policy
- Safeguarding and Prevent Policy
- Modern Slavery and Human Trafficking Policy
- Data Protection Policy
- Grievance Policy
- Disciplinary Policy
- Learner Appeals and Complaints Policy and Procedures
- Malpractice and Maladministration Policy
- Equality, Diversity and Inclusion Policy
- Records Retention Schedule

Monitoring and review

This policy will be reviewed annually or sooner where:

- Legislation or official guidance changes
- A serious whistleblowing concern identifies a weakness
- A person reports retaliation
- Educationwise changes its reporting arrangements
- Funding or regulatory requirements change
- An audit or inspection identifies an issue
- There is evidence that the process is not working effectively

The policy will be approved by the Educationwise Board and significant whistleblowing matters will be reported to the Board through normal governance arrangements.