

WHISTLEBLOWING POLICY & PROCEDURE

1) Introduction

ETT is committed to the highest standards of transparency, integrity, and accountability. We actively encourage a culture where concerns about malpractice can be raised without fear of detriment. This policy provides a framework for all stakeholders to raise concerns confidentially and responsibly.

Whistleblowing refers to the disclosure of information that relates to suspected wrongdoing or dangers in connection with ETT's delivery of education and training services objectives.

2) Purpose

- a) To enable all stakeholders to raise concerns about wrongdoing or malpractice in a confidential and secure manner.
- b) To ensure such concerns are dealt with seriously, thoroughly, and promptly.
- c) To protect whistleblowers from reprisals or victimisation for genuine disclosures.

3) Scope

- a) The policy applies to;
 - i) Learners
 - ii) Apprentices
 - iii) Employers
 - iv) Trustees
 - v) ETT Employees
 - vi) Subcontractors

4) What Can Be Reported

- a) See list within section 12 of this document
- b) Concerns relating to personal grievances should be addressed via the Complaint, Grievance and Appeals Policy.

5) Raising a Concern

- a) Whistleblowing concerns raised from a non-staff member:
 - i) Verbally or in writing to the Designated Safeguarding Lead (DSL) or Deputy DSL (see details below).
 - ii) Concerns can be raised anonymously, however investigation may be limited if contact cannot be made/maintained.
 - iii) Through an external reporting channel where appropriate (e.g. ESFA, DfE, NSPCC, Protect etc.)
- b) Whistleblowing concern raised by a staff member
 - i) If a concern about another staff member, then it should be raised with DSL (see below). If the concern relates to the DSL then this referral will be to Deputy DSL or the Chair of Trustees.
 - ii) Staff are encouraged to raise concerns about poor or unsafe practice and potential failures both within ETT, our Academy, employer premises, or our sub-contracted provision.
 - iii) ETT encourages whistleblowing. Staff are empowered to raise concerns without the risk or reprisal.

- iv) If a staff member feels unable to raise a concern, or feels that their genuine concerns are not being addressed, they are encouraged to raise it with an appropriate agency e.g. Ofsted or The Local Safeguarding Children Board.

6) Key People

- a) Designated Safeguarding Lead (DSL): Mark Vingoe, CEO,
m.vingoe@theengineeringtrust.org
- b) Deputy DSL (DDSL): Melvyn Parr, Director – Delivery and Operations,
m.parr@theengineeringtrust.org
- c) Deputy DSL (DDSL): Anthony Melia, Head of Quality, Risk and Compliance,
a.melia@theengineeringtrust.org
- d) Chair of Trustees: Richard Morris

7) Investigation Process

- a) Upon receipt of a concern, the DSL or DDSL will acknowledge receipt within 2 working days.
- b) An initial assessment will determine the appropriate course of action (which may include a full investigation).
- c) The whistleblower may be interviewed and asked to provide evidence.
- d) Outcomes may include internal action, referral to regulators, formal disciplinary proceedings or may not result in further action being warranted.
- e) The whistleblower will be kept informed of progress and outcomes where appropriate.

8) Protection & Confidentiality

- a) Whistleblowers will not face any detriment or retaliation for raising concerns in good faith.
- b) Identities will be protected wherever possible.
- c) Any victimisation of whistleblowers will result in disciplinary action.
- d) Malicious or knowingly false allegations may lead to disciplinary consequences.

9) External Disclosures

- a) ESFA: <https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures>
- b) Protect (formerly Public Concern at Work): <https://protect-advice.org.uk>
- c) NSPCC (Safeguarding concerns): 0800 028 0285 or help@nspcc.org.uk
- d) Ofsted Whistleblowing Contact Details: whistleblowing@ofsted.gov.uk or 0300 123 3155

10) Monitoring & Review

- a) ETT will keep a secure log of whistleblowing cases (excluding identities unless consented).
- b) Trends or themes will be reported to the Trustee Board (in a non-identifiable way).
- c) This policy is reviewed annually or after any significant incident or regulatory change.

11) Related Policies

- a) Safeguarding and Prevent Policy and Procedure
- b) Complaint, Grievance and Appeals Policy
- c) Apprentice Code of Conduct
- d) Staff Disciplinary Policy and Procedure

12) Whistleblowing Examples (not exhaustive)

a) **Financial Mismanagement or Fraud**

Example: A staff member at ETT notices that funds from the Apprenticeship Levy are being redirected into unrelated business expenses, with no audit trail or justification

b) **Bribery, Corruption, or Blackmail**

Example: A staff member is offered a gift or cash incentive by an employer in exchange for approving an apprentice's progress without proper assessment

c) **Unsafe Working or Learning Environments**

Example: An apprentice reports that their placement site regularly ignores health and safety regulations, such as not providing PPE on a construction site, despite multiple complaints.

d) **Abuse or Neglect of Learners**

Example: A Training Officer overhears a manager at an apprentice's workplace making sexually inappropriate comments to them, and the apprentice seems afraid to report it.

e) **Breach of Safeguarding Responsibilities (including Prevent)**

Example: A learner discloses that they are being groomed online, and the staff member they told did nothing and failed to report it to the Designated Safeguarding Lead.

f) **Breach of Legal Obligations or Regulatory Requirements**

Example: A subcontractor consistently delivers fewer hours of training than required by ESFA funding rules, and nobody is informing the regulators.

g) **Discrimination or Harassment**

Example: An apprentice with a learning difficulty is consistently left out of sessions and mocked by peers during off-the-job training, and staff take no action when informed.

h) **Misuse of Public Funds**

Example: Funding claims for apprentices who no longer work at a placement are made. The apprentice is no longer receiving training, but their ILR records are left active to draw payments.

i) **Academic Malpractice or Qualification Fraud**

Example: A tutor completes written assignments on behalf of apprentices to speed them through their qualification and boost provider success rates.

j) **Deliberate Concealment of Any of the Above**

Example: A manager instructs staff to delete emails and notes related to a safeguarding concern so the issue won't show up in an Ofsted inspection.