

Whistleblowing Policy

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Signed	
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1. Skills4 Group, the trading name of I & F Limited, contact details

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2.

1. Policy statement

Skills4 Group is committed to acting lawfully, ethically and with integrity. We recognise that the people closest to our work are often the first to notice when something is wrong. We therefore encourage workers and others connected with Skills4 Group to raise serious concerns at the earliest opportunity.

This policy explains how to report suspected wrongdoing, how Skills4 Group will respond and the protection available to a worker who makes a qualifying disclosure. It is intended to support an open culture across Skills4Pharmacy, Skills4Science, Skills4Dental and all other Skills4 Group activities.

2. Purpose

The purpose of this policy is to:

- provide safe, clear and accessible routes for raising concerns;
- help people distinguish whistleblowing from a personal grievance, learner complaint or safeguarding referral;
- ensure disclosures are considered promptly, consistently and by an impartial person;
- protect confidentiality as far as reasonably possible and prevent retaliation;
- support compliance with employment, education, funding, safeguarding, data protection and other legal or regulatory duties; and
- identify learning and improvements that protect learners, staff, employer partners, public funds and the wider public.

3. Scope

This policy applies across Skills4 Group to employees, workers, agency staff, contractors, consultants, interns, work-experience participants and trainees. It also provides a route for directors, non-executive directors, volunteers, learners, apprentices, employer partners, suppliers and other stakeholders to raise a serious concern, although the statutory protection available to them will depend on their legal status and the circumstances.

The policy covers concerns connected with Skills4 Group's employment practices, apprenticeship and Skills Bootcamp delivery, learner welfare, teaching and assessment, employer engagement, use of public funds, information systems, supply chain and corporate governance.

4. What whistleblowing means

Whistleblowing is the disclosure of information about suspected wrongdoing where the person raising the concern reasonably believes that the wrongdoing is in the public interest. A disclosure can relate to something that happened in the past, is happening now or is likely to happen.

Under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025, a protected disclosure may concern:

- a criminal offence;
- a breach of a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any person;
- damage to the environment;
- sexual harassment; or
- the deliberate concealment of information tending to show any of the above.

A concern does not need to be proved before it is raised. The person should, however, have a reasonable belief that the information tends to show wrongdoing and that raising it is in the public interest.

5. Concerns particularly relevant to Skills4 Group

Examples include, but are not limited to:

- fraud, bribery, corruption, theft, false accounting or misuse of apprenticeship, Skills Bootcamp or other public funding;
- deliberate falsification of learner records, attendance, off-the-job training, progress, prior learning, eligibility, achievement, assessment or Individualised Learner Record data;
- serious assessment malpractice, improper influence over assessment decisions or concealment of quality failures;
- a serious or systemic safeguarding failure, unsafe practice or failure to act on a risk to a child or adult at risk;
- conduct that creates a serious risk to patient, learner, staff or public health and safety;
- sexual harassment, serious harassment, discrimination or exploitation where the concern is reasonably believed to be in the public interest;
- serious breaches of data protection, confidentiality, cybersecurity or information security requirements;
- breaches of education, employment, equality, health and safety, environmental or other legal obligations;
- serious conflicts of interest, abuse of authority, unethical conduct or attempts to mislead an employer partner, awarding organisation, regulator, inspector or funder;
- retaliation against a person who has raised or supported a concern; or

- an attempt to hide, destroy or manipulate evidence of wrongdoing.

6. Choosing the right route

Type of issue	Usually use
Wrongdoing in the public interest	This Whistleblowing Policy.
A personal employment concern, such as an individual contractual dispute	The Grievance Procedure, unless the concern also has a wider public-interest element.
Bullying, harassment or discrimination affecting you personally	The Grievance Procedure or relevant harassment policy. Use whistleblowing where the concern is wider or in the public interest.
Dissatisfaction with a learner service or training experience	The Complaints Policy, unless serious public-interest wrongdoing is alleged.
Immediate concern about a child or adult at risk	The Safeguarding Policy and designated safeguarding route immediately. Do not wait for a whistleblowing review.
Immediate danger or suspected crime	Emergency services or the police where necessary, then notify the appropriate Skills4 contact when safe to do so.

If it is unclear which route applies, contact the Head of People or another senior leader. Skills4 Group will redirect the matter without penalising the person for using the wrong procedure in good faith.

7. How to raise a concern internally

A concern may be raised verbally or in writing. Written reports are helpful but are not required. Use whichever of the following routes feels most appropriate:

1. Your line manager or another manager you trust.
2. Sarah Wain, Head of People, as the policy owner and primary confidential contact.
3. Samantha Tobin, Operations Director, if the concern involves your manager, the Head of People or if you do not feel able to use the first routes.
4. Jamie Crinigan, Managing Director, or Barbara Van Der Eeken, Chairperson, if the concern involves a director or is exceptionally serious.
5. The Designated Safeguarding Lead or deputy where there is a safeguarding, Prevent or immediate welfare concern.

Reports can be made through normal internal contact details, by telephone, or by post marked 'Private and Confidential - Whistleblowing' to the Skills4 Group address shown in this policy. The central email address info@skills4group.co.uk may be used where a direct

internal address is not available; the subject line should state 'Private and Confidential - for the Head of People'.

URGENT RISK

If someone is in immediate danger, call 999. Safeguarding concerns must be referred promptly under the Safeguarding Adults & Children Policy. Evidence should not be accessed, copied or removed unlawfully in an attempt to investigate the matter personally.

8. Information to provide

Provide as much of the following as is known. Do not delay reporting because some details are unavailable:

- what happened, is happening or is likely to happen;
- who is involved and who may be affected;
- relevant dates, locations, programmes, employers or systems;
- why the matter is believed to be wrongdoing and in the public interest;
- whether there is an immediate safeguarding, health and safety, data or evidence-preservation risk;
- any lawful supporting information and where further evidence may be found;
- whether the matter has already been raised and what happened; and
- how Skills4 Group can communicate safely with the person raising the concern.

9. Confidential and anonymous reports

Confidentiality

Skills4 Group will keep the identity of the person raising a concern confidential as far as reasonably possible. Information will be shared only with people who need it to assess, investigate, obtain advice or take action. Absolute confidentiality cannot be guaranteed where disclosure is required by law, is necessary to protect someone from harm or is essential to a fair process. If identity may need to be disclosed, this will normally be discussed first where lawful and practicable.

Anonymous disclosures

Anonymous concerns will be considered. However, anonymity can make it harder to clarify information, assess credibility, provide updates or protect the person from retaliation. Anyone reporting anonymously should give enough detail to allow the concern to be assessed and, if possible, provide a safe way to receive questions without revealing their identity.

10. What Skills4 Group will do

The person receiving a disclosure must send it promptly to the Head of People or an alternative senior lead where a conflict exists. It must not be dismissed, debated widely or investigated informally by someone who may be involved.

Skills4 Group will normally:

- acknowledge a named disclosure within five working days;

- carry out an initial assessment to identify the issues, appropriate procedure, conflicts of interest and immediate risks;
- appoint a suitably impartial person to investigate or refer the matter to another competent body;
- agree a safe communication method and, where appropriate, offer a meeting;
- consider temporary measures to protect people, evidence, systems, public funds or service delivery;
- keep a proportionate, secure record of decisions and evidence;
- provide updates at appropriate intervals, recognising that confidentiality or legal constraints may limit detail; and
- communicate when the process is complete and, where possible, whether action has been taken.

The seriousness and complexity of concerns vary, so no fixed completion period applies. Skills4 Group will act without unreasonable delay and explain material delays where it can do so.

11. Meetings, support and representation

A person raising a concern may ask to be accompanied at a meeting by a workplace colleague or trade union representative. Skills4 Group may agree another support person where appropriate, particularly for accessibility, communication or wellbeing needs. The companion must respect confidentiality and must not obstruct the process.

Reasonable adjustments will be made for disabled people and accessible reporting arrangements will be offered where needed. The Head of People can also signpost wellbeing support and independent advice.

12. Protection from retaliation

Skills4 Group will not tolerate dismissal, disciplinary action, threats, harassment, exclusion, loss of hours or opportunities, adverse references, intimidation or any other detriment because a person raised or supported a genuine concern. This protection applies whether or not the concern is ultimately substantiated, provided it was not knowingly false.

Anyone who believes they have suffered retaliation should report it immediately to the Head of People, Operations Director, Managing Director or Chairperson. Alleged retaliation will be considered separately and may result in disciplinary or contractual action.

No confidentiality clause or non-disclosure agreement used by Skills4 Group is intended to prevent a worker from making a protected disclosure, reporting a crime, cooperating with a regulator or law-enforcement body, or obtaining legal advice.

13. Knowingly false or malicious allegations

A concern raised honestly and on reasonable grounds will not lead to disciplinary action merely because it is mistaken or not substantiated. Deliberately providing information known to be false, fabricating evidence or making an allegation solely to harm another

person may, however, be dealt with under the Disciplinary Procedure or relevant contractual arrangements. A decision that a concern is unsubstantiated does not, by itself, mean it was malicious.

14. External disclosures

Skills4 Group encourages internal reporting because it usually gives us the earliest opportunity to investigate and put matters right. A worker may nevertheless make a disclosure to an appropriate external body where the legal conditions are met. The correct body depends on the subject of the concern.

Potential routes relevant to Skills4 Group may include:

- the Department for Education for qualifying concerns about a post-16 provider or suspected fraud involving education or training funds;
- Ofsted or Ofqual where the concern falls within their prescribed remit;
- the Information Commissioner's Office for data protection matters;
- the Health and Safety Executive or relevant local authority for health and safety matters;
- the Equality and Human Rights Commission for matters within its remit;
- the police or Serious Fraud Office for appropriate criminal or serious fraud concerns; and
- another person or body included in the current GOV.UK list of prescribed people and bodies.

Different and more demanding legal tests can apply to disclosure to the media, social media or other third parties. A worker considering an external disclosure should seek independent advice and take care not to disclose personal data, confidential learner information, patient information or other material unlawfully.

15. Independent advice

Independent guidance is available from [Acas](#), the independent whistleblowing charity [Protect](#), a trade union or a legal adviser. Current government guidance and the list of prescribed people and bodies are available at [GOV.UK](#).

16. Records and data protection

Records created under this policy will be factual, relevant and stored securely with access limited to those who need it. Personal data will be handled in accordance with the UK GDPR, the Data Protection Act 2018, the Skills4 Group Data Protection Policy and applicable retention arrangements.

A central, restricted record should capture the date received, category of concern, risk assessment, actions, outcome and learning while avoiding unnecessary personal information. Records must not be kept in general personnel or learner files unless there is a lawful and documented reason.

17. Roles and responsibilities

Role	Responsibility
Board / senior leadership	Set the speak-up culture, ensure suitable oversight, review themes and confirm that retaliation is not tolerated.
Head of People	Own the policy, receive and triage disclosures, manage conflicts, maintain restricted records and advise on worker protection.
Operations / Quality / Compliance	Support investigation and corrective action involving delivery, funding, data, quality, assessment or regulatory duties.
Designated Safeguarding Lead	Lead immediate safeguarding and Prevent action and coordinate with the whistleblowing lead where issues overlap.
Managers	Listen, protect confidentiality, escalate promptly, avoid retaliation and do not investigate outside their authority.
All staff and workers	Raise serious concerns promptly, provide information honestly, preserve confidentiality and cooperate with a lawful investigation.
Investigator	Act impartially, define scope, gather and test evidence fairly, keep records and report findings and recommendations.

18. Learning, monitoring and review

Whistleblowing themes, response times, outcomes and control improvements will be reported in anonymised form to the appropriate senior governance forum. Reporting must not identify a person raising a concern unless this is lawful, necessary and proportionate.

This policy will be communicated during induction and made accessible to staff. Managers and those who may receive or investigate disclosures will receive suitable guidance. The policy will be reviewed annually and sooner following material legal, regulatory or organisational change, a serious incident, audit finding or identified weakness.

19. Related policies and procedures

- Anti-Harassment & Bullying Policy
- Sexual Harassment & Harassment Policy
- Complaints Policy

- Grievance Procedure
- Disciplinary Procedure
- Safeguarding Adults & Children Policy
- Prevent & Radicalisation Policy
- Staff Code of Conduct
- Fraud, Bribery and Corruption controls
- GDPR & Data Protection Policy
- Information Security / Cybersecurity arrangements
- Health and Safety Policy

Appendix 1 - Quick route guide

Situation	Action
Immediate danger	Call 999 or the appropriate emergency service.
Safeguarding or Prevent risk	Contact the Designated Safeguarding Lead or deputy immediately.
Serious public-interest wrongdoing	Use the internal whistleblowing routes in section 7.
Concern involves your manager	Contact the Head of People or another senior leader.
Concern involves the Head of People	Contact the Operations Director.
Concern involves a director or is exceptionally serious	Contact the Managing Director or Chairperson.
Personal employment issue	Use the Grievance Procedure unless there is also a public-interest concern.
Learner service complaint	Use the Complaints Policy unless serious public-interest wrongdoing is alleged.
External advice needed	Contact Acas, Protect, a trade union or legal adviser.

Appendix 2 - Whistleblowing disclosure record

This optional record can be used by a person raising a concern or by the authorised recipient. Store the completed record securely and restrict access.

Field	Record
Date and time received	
Person receiving the concern	
Name and safe contact details (if provided)	
Confidentiality or anonymity requested	
Summary of suspected wrongdoing	
Why it may be in the public interest	
People, learners, programmes or employers affected	
Key dates and locations	
Evidence identified and where held	
Immediate risk: safeguarding / safety / data / funds / evidence	
Previous report or action	
Conflict-of-interest check	
Initial route and lead appointed	

Acknowledgement date	
Actions, owner and review date	
Outcome and learning	
Closure communication date	