

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

## TTT POLICY DOCUMENT

# Whistleblowing Policy

*A safe, confidential route for anyone to raise concerns about serious wrongdoing at TTT.*

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## Document Control

<b>Document Title</b>	Whistleblowing Policy
<b>Version</b>	1.0
<b>Effective Date</b>	22 April 2026
<b>Next Review Date</b>	22 April 2027
<b>Policy Owner</b>	Phenil Mehta, Centre Manager
<b>Primary Disclosure Contact</b>	Phenil Mehta, phenil@theteachertrainer.co.uk
<b>Alternative Contact (where CM is conflicted)</b>	Shaily Mehta, shaily@theteachertrainer.co.uk
<b>Approved By</b>	Phenil Mehta, Centre Manager
<b>Classification</b>	Public
<b>Applies To</b>	All TTT employees, associates, contractors, volunteers, learners and third parties

# Whistleblowing Policy

## 1. Purpose

This policy gives TTT staff, associates, contractors, volunteers, learners and third parties a safe and confidential route to raise concerns about serious wrongdoing and be protected when they do. It supports TTT's compliance with the Public Interest Disclosure Act 1998 (PIDA), which amends the Employment Rights Act 1996 and the Ofqual centre expectations around integrity and culture.

## 2. Scope

This policy applies to concerns raised in the public interest about wrongdoing at TTT, including:

- A criminal offence, including fraud, bribery, theft or violence
- A failure to comply with a legal or regulatory obligation, including Awarding Organisation or Ofqual requirements
- A miscarriage of justice
- A danger to the health or safety of any individual
- Damage to the environment
- Deliberate concealment of any of the above
- Serious breach of TTT's own policies, including safeguarding, data protection, malpractice, anti-bribery, equality or conflict of interest

This policy does not cover:

- Personal grievances relating to a staff member's own employment (see the Grievance Policy)
- Learner complaints about service (see the Complaints Policy)
- Appeals against assessment decisions (see the Appeals Policy)

## 3. Definitions

The following terms carry the meanings given throughout this policy.

<b>Whistleblower</b>	A person who raises a concern about wrongdoing at TTT in the public interest.
<b>Protected Disclosure</b>	A disclosure that meets the definition in PIDA and therefore attracts protection from detriment and unfair dismissal for the discloser.
<b>Good Faith</b>	An honest belief that the information disclosed and any allegation contained in it, is substantially true.
<b>Detriment</b>	Any action or failure to act that puts the whistleblower at a disadvantage because of the disclosure, including dismissal, denial of opportunities, isolation or harassment.
<b>Prescribed Person</b>	A regulator or other person to whom a disclosure can be made lawfully under PIDA, such as Ofqual, the ICO, HSE, HMRC or the Charity Commission.

## 4. Policy Statement

TTT is committed to the following principles and commitments.

1. TTT encourages anyone with a genuine concern about wrongdoing to raise it and provides multiple routes to do so.
2. Whistleblowers who raise a concern in good faith are protected from detriment, in line with PIDA and TTT's own commitment, regardless of whether the concern turns out to be upheld.
3. Confidentiality is preserved as far as possible; where full confidentiality is not practical, the whistleblower is told why and kept informed.
4. Anonymous disclosures are accepted and investigated, although the absence of a known source may limit what can be done.
5. TTT takes vexatious, malicious or knowingly false disclosures seriously; they are not protected and may lead to disciplinary action.
6. TTT investigates disclosures proportionately, fairly and promptly and keeps the whistleblower informed of the outcome, subject to lawful restrictions.
7. The Whistleblowing Policy operates alongside the Complaints, Appeals, Grievance and Safeguarding policies, which handle matters those policies were designed for.

## 5. Roles and Responsibilities

Role	Responsibility
Centre Manager (Phenil Mehta)	Overall accountability; receives and investigates disclosures where not conflicted; decides outcomes; liaises with regulators where needed; reviews this policy annually.
Alternative Contact (Shaily Mehta)	Receives and investigates disclosures where the Centre Manager is the subject of the concern or is conflicted.
Course Coordinator	Logs disclosures securely in the Whistleblowing Register; manages timescales; supports the investigator with evidence retrieval.
All staff, associates and contractors	Act in good faith; raise genuine concerns promptly; cooperate with investigations; do not retaliate against a whistleblower.

## 6. How to Raise a Concern

A concern can be raised through any of the following routes, in order of preference. The whistleblower is not required to go through line management first and may use any route they consider appropriate.

### 6.1 Internal routes

- Email: phenil@theteachertrainer.co.uk, with the subject line 'Whistleblowing disclosure'
- Post: marked 'Private and Confidential' to Phenil Mehta, Centre Manager, The Teacher Trainer Ltd, Regus House, Fairbourne Drive, Atterbury, Milton Keynes MK10 9RG
- In person: by requesting a private meeting with the Centre Manager or Alternative Contact

- Where the concern is about the Centre Manager directly or the Centre Manager would be conflicted, the disclosure should be made to the Alternative Contact at shaily@theteachertrainer.co.uk

## 6.2 External routes (Prescribed Persons)

A whistleblower may, instead of or after raising a concern internally, raise it with a Prescribed Person. Typical Prescribed Persons relevant to TTT include:

- Ofqual (Office of Qualifications and Examinations Regulation) for regulatory matters affecting qualifications
- The Awarding Organisation for the relevant qualification
- The Information Commissioner's Office (ICO) for data protection concerns
- The Health and Safety Executive (HSE) for safety concerns
- HMRC for tax-related concerns
- The Police, Action Fraud or the National Crime Agency for criminal matters
- Protect (formerly Public Concern at Work), the independent UK whistleblowing charity, for confidential advice

## 6.3 What to include

- A clear description of the concern, with dates, places and people involved where known
- Why the whistleblower believes the conduct is wrong
- Any supporting information the whistleblower already has
- Contact details, if the whistleblower wishes to be updated (anonymous disclosures are accepted)

## 7. Handling a Disclosure

Stage	Activity and Timescale
<b>Acknowledgement</b>	The disclosure is acknowledged in writing within 7 calendar days of receipt (where the whistleblower has given contact details).
<b>Initial assessment</b>	Within 7 calendar days, the Centre Manager or Alternative Contact assesses the concern, decides whether it falls under this policy and determines the investigation approach.
<b>Investigation</b>	A proportionate investigation is carried out, typically within 28 calendar days. Complex cases may take longer; the whistleblower is kept informed of progress.
<b>Independent support</b>	Where the Centre Manager is conflicted, the Alternative Contact leads; in complex or serious cases, an external investigator such as an HR consultant may be appointed.
<b>Outcome</b>	A written outcome is provided to the whistleblower (subject to lawful restrictions), setting out the conclusion, any action taken and any next step available to the whistleblower.

Stage	Activity and Timescale
Learning	Root-cause analysis and corrective actions are tracked to closure; lessons are fed into TTT's self-evaluation and staff training.

## 8. Protection from Detriment

- No staff member, associate, contractor, volunteer, learner or third party will be subjected to dismissal, disciplinary action, threats, denial of opportunities, isolation or any other form of detriment for raising a genuine concern in good faith under this policy
- Retaliation against a whistleblower is itself a serious breach of the Staff Code of Conduct and is subject to action under the Staff Disciplinary and Sanctions Policy
- The PIDA provides legal remedy where an employee or worker is subjected to detriment or dismissal because of a protected disclosure
- Where a whistleblower is concerned about retaliation, TTT considers temporary measures such as redeployment of tasks, confidentiality enhancement or temporary reporting-line change

## 9. Confidentiality

- TTT treats the identity of a whistleblower as confidential, to the extent practical within the investigation
- Where disclosure of the whistleblower's identity is required by law or is essential for the investigation, the whistleblower is informed in advance
- Personal data processed during a disclosure is handled under the Data Protection and GDPR Policy

## 10. Anonymous, Malicious or Vexatious Disclosures

- Anonymous disclosures are accepted and investigated as far as practical; limitations caused by anonymity are recorded
- Disclosures made in bad faith, for personal advantage or where the discloser knows the allegation is untrue are not protected by this policy and may lead to disciplinary action under the Staff Disciplinary and Sanctions Policy or the Sanctions Policy (learner)
- A disclosure that turns out not to be upheld is still protected, provided it was made in good faith

## 11. Records and Retention

TTT retains the following for a minimum of six years after the case is closed or longer where law or the Awarding Organisation requires it:

- The disclosure and any supporting evidence
- Investigation folder, including interview notes and evidence considered
- Outcome letter and any actions or sanctions resulting

- Correspondence with Prescribed Persons or external advisers, where applicable

Records are held securely in line with the Data Protection Policy and the Data Retention and Disposal Policy. Access is strictly limited.

## 12. Training and Awareness

- This policy is issued to every new staff member and associate at induction
- Awareness refresh is included in annual training and staff meetings
- The Centre Manager and Alternative Contact receive training on handling disclosures, including confidentiality, PIDA protections and investigation skills

## 13. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by legal or regulatory changes, significant cases or patterns in disclosures. All outcomes are recorded in the Version History at Section 15.

## 14. Related Documents

This policy should be read alongside:

- Staff Code of Conduct
- Staff Disciplinary and Sanctions Policy
- Grievance Policy
- Safeguarding and Prevent Duty Policy
- Conflict of Interest Policy
- Anti-Bribery and Corruption Policy
- Malpractice and Maladministration Policy
- Complaints Policy
- Appeals Policy
- Data Protection and GDPR Policy
- Data Retention and Disposal Policy

## 15. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	Supersedes prior Whistleblowing Policy dated 07/04/2026. PIDA and Prescribed Persons framework added explicitly. Named Alternative Contact added. Timescales, handling stages and PIDA protection from detriment clarified. Anonymous, malicious and vexatious disclosure handling specified.

## 16. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta  
Name

*P Mehta*  
Signature

22/04/2026  
Date