

**Whistleblowing Policy**

Version 1 29/07/2025

Next Review 01/07/2026

# ELA TRAINING SERVICES

## Whistleblowing Policy

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## Whistleblowing Policy

### Statement of Intent

ELA Training Services is committed to the highest standards of openness, integrity, and accountability. Employees are often the first to recognise potential wrongdoing within the organisation, but they may feel reluctant to report their concerns due to fears of disloyalty, victimisation, or retaliation. This policy provides a clear and confidential process for employees and stakeholders to report concerns without fear of reprisal. It ensures that serious issues are addressed appropriately and that individuals raising concerns in good faith are protected in line with the Public Interest Disclosure Act 1998 (PIDA).

### Definition and Scope

This policy applies to:

- All employees, and Operational board members of ELA Training Services
- Subcontractors, consultants, and external partners engaged in work with ELA Training Services
- Any individual who has concerns about ELA Training Services operations, finances, governance, or ethical conduct.

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work that is in the public interest. This may include:

- Criminal activity; (e.g., fraud, bribery, corruption)
- Miscarriages of justice.
- Danger to health and safety; (violations that put individuals at risk)
- Damage to the environment.
- Failure to comply with any legal obligation or regulatory requirements.
- Financial fraud or mismanagement.
- Negligence.
- Breach of our internal policies and procedures.
- Conduct is likely to damage our reputation.
- Unauthorised disclosure of confidential information.
- The deliberate concealment of any attempts to conceal wrongdoing including those above.

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

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- This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

If you are uncertain whether something is within the scope of this policy, you should seek advice from

**Raising a whistleblowing concern**

- We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.
- However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should report the matter to the Whistleblowing Officer, Catherine Goodwin – Chief Operating Officer and send an email to [cath@ela-training.co.uk](mailto:cath@ela-training.co.uk)
- We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will make a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

For further guidance, refer to the following website:

- UK Government's whistleblowing page: [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)
- How ESFA handles whistleblowing disclosures:  
<https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures>

**Confidentiality**

- We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity undisclosed. If it is necessary for anyone to investigate your concern to know your identity, we will discuss this with you.



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- We do not encourage employees to make disclosures anonymously. An appropriate investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline.

## How to Raise a Concern

### Step 1 – Internal Reporting

If you suspect malpractice or wrongdoing, you should report your concerns to your Operations Manager. If this is not appropriate due to the nature of the concern, you may contact:

- Chief Operating Officer
- Chief Executive Officer
- Toni Eastwood (Chair/Non-Executive Board Member – *Independent*)

[Toni@ela-training.co.uk](mailto:Toni@ela-training.co.uk)

Concerns can be raised verbally or in writing. Written reports should include:

- A description of the concern.
- Any supporting evidence.
- Details of any previous attempts to raise the issue.

### Step 2 – Acknowledgement and Initial Response

Within 10 working days, you will receive a written response outlining:

- How the concern will be handled.
- The estimated timeframe for investigation.
- Whether initial enquiries have been made.
- Whether further investigation is required, and if not, why.
- Information about available support.

At this stage, the Chief Operating Officer will be notified that a whistleblowing report has been received.

### Step 3 – Investigation Process

Depending on the nature of the concern, investigations may involve:

- Internal review by the relevant manager or Whistleblowing Officer.
- Independent investigation by the Operations Board Members.
- Referral to external bodies, such as ESFA, Ofsted, or the Police.
- Commissioning an independent external inquiry.

### Step 4 – Outcome and Follow-up

Once the investigation is completed, you will be informed in writing of:

- The outcome of the investigation.



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- Any actions taken (subject to confidentiality restrictions).
- Any further steps required.

If you feel your concern has not been handled appropriately, you may escalate it to an external authority.

**Investigation Process**

- Once a concern has been raised, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter.

The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

- We will aim to keep you informed of the progress of the investigation and its likely timescale (as detailed above). However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

**If you are not satisfied**

- While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts whose details are set out above: **Step 1 – Internal Reporting**

**Escalation - External disclosures**

- The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a learner, client or

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supplier. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first.

If you are not satisfied with the internal response, or if you believe the concern is so serious that external reporting is necessary, you may contact:

- Ofsted
- A relevant voluntary organisation
- The Police
- The Local Government Ombudsman
- Equality and Human Rights Commission
- Education & Skills Funding Agency (ESFA)

You can report fraud or financial irregularity (including suspicions) by emailing allegations [mailbox@education.gov.uk](mailto:mailbox@education.gov.uk).  
<https://www.gov.uk/guidance/report-fraud-or-financial-irregularity-to-esfa>

It is your responsibility to ensure that the disclosure is made in the public interest and to a recognised body. Disclosures to non-recognised external bodies may not be protected under PIDA.

Seeking Advice If you are unsure about how to proceed, you may seek independent advice from: Protect Advice on [020 3117 2520](tel:02031172520) and <https://protect-advice.org.uk/> in accordance with the provisions of the Public Interest Disclosure Act 1998.

### Protection and support for Whistleblowers

- It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support any employee who raises genuine concerns under this policy, even if they turn out to be mistaken.
- Employees must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the individuals named in this policy immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

Under the Public Interest Disclosure Act 1998 (PIDA), employees who report concerns in good faith are legally protected from:

- Unfair treatment or victimisation.
- Dismissal or negative changes to their employment conditions.



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- Retaliation against a whistle-blower is a serious disciplinary offence; therefore, employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

**Responsibility for the success of this policy**

- The Management has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- The Management may delegate day-to-day operational responsibility for this policy to the Whistleblowing Officer. The Management will ensure that all managers and other employees who may deal with concerns or investigations under this policy receive appropriate training.
- This policy should be reviewed from a legal and operational perspective at least once a year.
- All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.
- Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to your line manager.

**Fraud Prevention**

- ELA take an active role against potential fraud. The presence of a whistleblowing policy highlights the process that should be followed in order to ensure all business activities are ethical, genuine and in the public interest.
- Our IQA process, countersigning policies, internal audit function and the use of third-party external auditors is designed to ensure learner claims are genuine and that all activity is valid.


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**Review**

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Chief Operating Officer.

Adoption Date	Updated	Review Date	COO
08/2024	29/07/2025	01/07/2026	



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