Whistleblower Policy 2026-2027

Document Control

Field	Details
Author	Head of Operations and Compliance
Document owner	Head of Operations and Compliance
Executive owner	Chief Executive Officer
Approved by	Senior Management Team
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Regulatory Framework	Employment Rights Act 1996, as amended; Public Interest Disclosure Act 1998; Employment Rights Act 2025; Equality Act 2010; UK General Data Protection Regulation; Data Protection Act 2018; current Whistleblowing Guidance for Employers; DfE Apprenticeships-Provider Agreement, July 2026, Version 4.6; Apprenticeship Funding Rules 2026 to 2027; Keeping Children Safe in Education 2026, where a disclosure relates to safeguarding practice

1. Purpose

Supply Chain Academy Limited (SCA) is committed to an open, accountable culture in which concerns about wrongdoing can be raised promptly and safely. This policy explains how concerns will be received, assessed, investigated, escalated and recorded, while protecting those who speak up from retaliation.

This policy also supports SCA's obligations as an apprenticeship training provider to prevent fraud and administrative malfunction, report suspected fraud or financial irregularity to the Department immediately in writing, and maintain an effective, approved and publicly available whistleblowing procedure.

2. Scope and status

This policy applies to employees, workers, agency workers, apprentices employed by SCA, contractors, consultants and other persons working under SCA's direction. Former workers may also raise concerns about matters encountered during their engagement.

Apprentices, learners, employers, subcontractors, partners and members of the public may use the reporting routes in this policy. However, statutory whistleblowing protection depends on the person's legal status and whether the disclosure meets the legal tests. SCA will nevertheless protect anyone raising a genuine concern from retaliation so far as it lawfully can.

This policy is non-contractual and may be amended following approval. It does not remove any right to report externally through a legally protected route.

3. What whistleblowing means

Whistleblowing is the disclosure of information which the person reasonably believes is in the public interest and tends to show that wrongdoing has occurred, is occurring or is likely to occur. A qualifying disclosure may concern:

- a criminal offence, including fraud, bribery, corruption or theft;
- a breach of a legal obligation;
- a miscarriage of justice;
- danger to health and safety;
- damage to the environment;
- sexual harassment;
- deliberate concealment of information about any of the above.

A person does not need proof and must not investigate the matter personally. The concern should be raised honestly on the information available. The motive for raising a concern does not determine whether legal protection applies, but knowingly false allegations may be addressed under the relevant conduct procedure.

4. Matters covered in apprenticeship delivery

Concerns connected with public apprenticeship funding must be raised immediately.

Examples include:

- false, inaccurate, incomplete or misleading funding or ILR information;
- claims unsupported by evidence, fabricated learning activity or falsified signatures;
- funding claimed for ineligible training, apprentices, learners or costs;
- manipulation of start, end, break, withdrawal, employment, prior learning or off-the-job training records;
- collusion involving staff, employers, subcontractors, assessment organisations or awarding organisations;
- improper learner or employer financial contributions;
- failure to pass on funding payments where required;
- computer fraud, unauthorised system access or deliberate data manipulation;
- concealment of audit findings, funding errors or financial irregularities;
- retaliation against a person raising a funding, safeguarding or quality concern.

5. Whistleblowing, grievances, complaints and safeguarding

Issue	Use this route
Wrongdoing affecting others or the public interest	Whistleblowing procedure
A personal employment concern, such as an individual contractual dispute	Grievance procedure. If the matter also includes public-interest wrongdoing, both procedures may apply.
Dissatisfaction with training or service delivery	Complaints procedure, unless the information indicates public-interest wrongdoing.
Immediate or potential harm to a child, young person or vulnerable adult	Safeguarding procedure immediately. Do not delay while deciding whether it is also whistleblowing.
Immediate danger or suspected serious crime	Contact emergency services or the police as appropriate, then notify SCA when safe to do so.

6. How to raise a concern

Concerns may be raised verbally or in writing. Written reports are encouraged because they create a clear record, but a verbal concern will be treated seriously. The reporter should provide, where known: the nature of the concern; relevant dates, people and locations; why wrongdoing is suspected; and any available documents or records. Reporters must not obtain evidence unlawfully or put themselves or others at risk.

6.1 Internal reporting routes

Raise the concern with your line manager, unless they may be involved or you are

uncomfortable doing so.

Raise the concern directly with the Chief Executive Officer or the Group HR Team by telephone on 01708 259480.

Where the concern involves the Chief Executive Officer, a member of SMT or a conflict of interest, raise it with the Executive Owner or another independent member of SMT. The recipient must arrange independent handling.

Safeguarding concerns must also be referred immediately through SCA's safeguarding reporting route under the Safeguarding Policy.

Reports should be clearly marked "Whistleblowing concern - confidential". SCA will acknowledge receipt as soon as reasonably practicable and identify a case manager who is independent of the matters raised.

6.2 Anonymous and confidential reports

A concern may be raised anonymously. SCA will consider it, although anonymity can limit the ability to clarify information, investigate or provide feedback. A reporter who gives their identity may request confidentiality. SCA will restrict identity information to those who need it for handling the concern, but cannot promise absolute secrecy where disclosure is required by law, necessary for a fair process, or needed to protect a person from harm. The reporter will be informed before identity is disclosed where lawful and practicable.

7. Assessment, investigation and outcome

The recipient records the concern securely and completes an initial assessment of urgency, conflicts, safeguarding, criminality, data protection, funding and regulatory reporting obligations.

An independent investigator is appointed with clear terms of reference. The investigator may obtain documents and statements, preserve relevant records and recommend interim safeguards.

The reporter may be invited to clarify information and may be accompanied at a meeting by a workplace colleague or trade union representative where appropriate.

SCA will provide proportionate updates and, at conclusion, confirm whether the concern was upheld in whole or part and whether action has been taken, so far as confidentiality, legal privilege and the rights of others permit.

Findings and actions are reported to the appropriate owner and SMT. Disciplinary, safeguarding, regulatory, recovery, control improvement or law-enforcement action may follow.

No person implicated in a concern may control the assessment, investigation or outcome.

If independence cannot be achieved internally, SCA will appoint a suitably qualified external investigator or adviser.

8. Immediate apprenticeship funding escalation

Any employee or worker receiving information that may indicate suspected fraud or financial irregularity in apprenticeship delivery must notify the Chief Executive Officer and Head of Operations and Compliance immediately. They must preserve relevant evidence and must not wait for the internal investigation to conclude before contractual notification is considered.

The Chief Executive Officer, supported by the Head of Operations and Compliance, is responsible for ensuring that the Department is notified immediately in writing where the threshold in clause 21.1 of the current Apprenticeships-Provider Agreement is met. The notification must use the current official contract notice, portal or helpdesk route and must be retained on the case file. Legal or specialist advice should be obtained where notification could prejudice a criminal investigation or breach law.

9. External disclosures and independent advice

SCA encourages internal reporting where appropriate, but a worker may make a protected disclosure to another lawful recipient. This may include a legal adviser or the correct prescribed person or body for the subject matter. A person considering an external disclosure should use the current GOV.UK list of prescribed people and bodies and may seek independent advice from Acas or Protect. Wider disclosures, including to the media, are subject to stricter legal conditions.

For education or apprenticeship matters, use the current official Department for Education or Department for Work and Pensions complaints, helpdesk or contractual notification route. Contact details can change and must be checked on GOV.UK at the date of reporting; outdated email or postal details must not be relied upon.

10. Protection from retaliation and support

SCA will not tolerate dismissal, detriment, victimisation, bullying, harassment, threats, reduced opportunities or other retaliation because a person has raised, supported or participated in the handling of a genuine concern. Retaliation may result in disciplinary action. Any suspected retaliation should be reported immediately through this policy or to HR.

Reasonable wellbeing, HR and occupational support will be offered as appropriate.

Managers must not seek to identify an anonymous reporter or instruct anyone to conceal, withdraw or avoid reporting wrongdoing.

11. Deliberately false allegations

A concern that is not upheld will not by itself result in action against the reporter. Where there is evidence that a person knowingly made a false allegation or falsified evidence, SCA may consider action under the relevant disciplinary, learner conduct or contractual procedure. This provision must not be used to deter genuine reporting or punish an honest mistake.

12. Confidentiality, data protection and records

SCA will process personal data lawfully, fairly, transparently and securely under its Data Protection Policy, the UK GDPR and the Data Protection Act 2018. Access to whistleblowing records will be limited by role. Case records must document the concern, triage, conflicts check, decisions, investigation, evidence, notifications, outcomes, actions, feedback and closure.

Records will be retained in line with SCA's retention schedule and any longer legal, funding, audit or litigation requirement. Records supporting apprenticeship funding or the provider agreement must be retained for the applicable contractual period. A legal hold overrides routine deletion. At the end of the retention period, records must be securely destroyed.

13. Roles and responsibilities

Role	Responsibility
SMT	Approve and regularly review the procedure; oversee significant themes, retaliation risks and corrective action; ensure public website publication.
Chief Executive Officer	Executive owner; ensure independence, resources, regulatory and contractual notifications, and action on findings.
Head of Operations and Compliance	Maintain the policy and central register; advise on funding-rule and provider-agreement implications; monitor actions and reporting evidence.
Group HR Team	Provide advice and support; help distinguish whistleblowing from grievance; monitor retaliation and employment actions.
Managers	Recognise disclosures, listen without judgement, keep information restricted, record and escalate promptly, and avoid investigating without authority.
All staff and workers	Raise concerns promptly; preserve evidence; cooperate with authorised investigations; maintain confidentiality.
Investigator	Act independently, manage conflicts, keep an evidence trail, report findings objectively and recommend proportionate actions.

14. Monitoring, training and assurance

- The policy will be included in induction and periodic manager training.
- SCA will publish the current approved procedure on its public-facing website.
- The Head of Operations and Compliance will maintain a restricted whistleblowing register and track actions to closure.
- SMT will receive anonymised trend and assurance reporting at least annually, and sooner for significant matters.
- Effectiveness checks will consider awareness, timeliness, independence, confidentiality, retaliation, overdue actions and whether required external notifications were made and evidenced.
- The policy will be reviewed annually and earlier after legal, funding-rule, provider-agreement, organisational or contact-route changes, or after a significant case.

15. Related policies and documents

- Safeguarding Policy
- Complaints Policy
- Grievance Procedure
- Disciplinary Procedure
- Data Protection Policy and retention schedule
- Anti-Fraud, Bribery and Corruption controls
- Conflict of Interest Policy
- Apprenticeship Funding Rules and current Apprenticeships-Provider Agreement

Appendix A

Authoritative sources checked

Source	Relevance	Location
Apprenticeship funding rules: 2026 to 2027, version 3	Department for Work and Pensions, current funding rules for starts from 1 August 2026 to 31 July 2027	https://www.gov.uk/government/publications/apprenticeship-funding-rules-and-assessment-plan-guidance-2026-to-2027
Apprenticeships-Provider Agreement, July 2026, version 4.6	Clauses 21.1 and 40.5, plus data and evidence obligations	Internal executed agreement reference 10001733_APPLEVY-6713_v10
Whistleblowing guidance for employers	Department for Business and Trade, published 6 April 2026	https://www.gov.uk/guidance/whistleblowing-guidance-for-employers
Whistleblowing for employees	GOV.UK overview of protected disclosures and qualifying wrongdoing	https://www.gov.uk/whistleblowing
Whistleblowing at work	Acas guidance updated 19 June 2026	https://www.acas.org.uk/whistleblowing-at-work
Whistleblowing: list of prescribed people and bodies	Department for Business and Trade, updated 2 June 2026	https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2
Keeping children safe in education 2026, Part One	Whistleblowing arrangements for concerns about safeguarding practice	Current internal copy / GOV.UK

SMT APPROVAL

Date	Updates / amendments	Signature
06/08/2022	Format change and version update	Neil Roll
01/08/2024	No Change	Neil Roll
01/10/2024	Update business name and logo from CP Training Services Ltd to Supply Chain Academy Limited WEF 12 September 2024.	Neil Roll
24/11/2025	Further Review	S Ozkaya
22/09/2026	Full 2026-2027 reformat and compliance update to version 8.0	Makayla Whyte