

Whistleblowing Policy

POLICY APPROVAL

Approval Required	Indicate with a tick (✓)		**Annual Review Required**	Indicate with a tick (✓)	
	Yes ✓	No		Yes ✓	No
Approval Panel	Loren Janes				
Approved by	Name: Loren Janes		Signature:	Date: September 2025	
Policy Review Date	September 2026				

Introduction

Employees are often the first to realise that there may be something seriously wrong within an organisation. However, they may not express their concerns because they feel that speaking out would be disloyal to colleagues or their employer. They may also fear harassment or victimisation.

Futures Changing Ltd is committed to combating malpractice and, if it is discovered, to dealing with it seriously and urgently, so as to deter it in future and to promote accountability.

The purpose of this policy is to encourage staff to disclose concerns about malpractice so that those concerns can be investigated without fear of reprisals, provided they are raised in good faith.

The meaning of “malpractice” is explained in paragraph 2.

Scope

This policy does not replace existing procedures that allow staff to raise grievances about their personal employment situation (e.g., grievance or disciplinary procedures). It is intended to cover concerns involving malpractice, not to provide a review mechanism for routine management decisions unless they involve malpractice.

For the purpose of this policy, malpractice includes, but is not limited to:

- Fraud, theft, corruption, bribery, or other financial irregularities.
- Other criminal activities or dishonesty.
- Failure to comply with a legal obligation, the staff code of conduct, or financial regulations.
- Miscarriage of justice.
- Creating or ignoring serious risks to health, safety, welfare, or the environment.

Procedure For Raising Concerns

Concerns about malpractice should be raised at the earliest opportunity with your line manager or a member of the Centre Management Team. Concerns are best raised in writing, setting out the background, history and reasons for the concern, giving names, dates and places where possible. If you feel unable to put your concern in writing, you can telephone or meet the appropriate person and a note of your concern will be made.
If you raise a concern and do not want your name to be disclosed to the perpetrator of the alleged malpractice, the person(s) with whom you raise the concern will not do so without your prior approval. You should appreciate that if the investigation process is to be carried forward effectively, your identity may have to be revealed and a statement by you may be required as part of the evidence.

- Concerns should be raised at the earliest opportunity with your line manager or a member of the Centre Management Team.
- Concerns are best raised in writing, including background, reasons for concern, names, dates, and places where possible. If you are unable to put your concern in writing, you may raise it verbally, and a note will be made.
- If you wish to remain anonymous, your identity will not be disclosed without your consent. However, for effective investigation, it may be necessary for your identity to be revealed.

Safeguarding Considerations

- Any whistleblowing concern that relates to the welfare or safety of children, young people, or vulnerable adults will also be handled under the safeguarding procedures, in line with KCSIE 2025.
- Staff raising concerns about potential abuse or safeguarding issues will be supported and protected from retaliation.

The Centres Response

The action taken by the Centre will depend upon the type of concern. The matters raised may be investigated internally, reported to the police (this will normally be the case if criminal activity is suspected), the internal or financial statements auditors, or the Skills Funding Agency. Or any combination of the above.

Initial enquiries will be made promptly to decide whether an investigation is appropriate and, if so, what form it should take. Concerns which fall within the scope of specific procedures (for example, harassment or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation.

Within ten working days of your concern being received, you will normally receive a written acknowledgement, sent to your home address. Thereafter, while it is not possible to stipulate specific timescales due to the nature of investigations of this type, you will be kept generally informed on how the matter is to be dealt with and the progress and outcome of the investigation.

The amount of contact between the person(s) considering your concerns and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from you.

How The Matter Can Be Taken Further

If you are not satisfied that your concern is being properly dealt with, you may refer it to the management team for further investigation of your concern.
This policy is intended to provide you with a way of raising concerns within the Centre. If, having used the alternatives above you are not satisfied with how the matter has been addressed and you feel it is right to take the matter outside the Centre, the following are possible contact points –

The Financial Statements Auditors
The Skills Funding Agency
The Department For Business Innovation & Skills
Your Solicitor
The Police
A Member Of Parliament
A Trade Union

In addition, Public Concern at Work, an independent, non-statutory charitable body, provides advice to individuals with concerns about malpractice at any time.

Details of where some of the above can be contacted are noted at the end of this document.

Protection For Whistle-Blowers And Penalties For Abuse

The Centre will take reasonable action to protect you when you raise a concern in good faith. Such action will be as follows:

Confidentiality clauses in contracts of employment will not be applied to the raising of such concerns under this procedure; any action designed to prevent or deter an individual from raising a genuine concern of malpractice or to victimise an individual for doing so will be regarded as a serious disciplinary offence.

Unless proved otherwise it will be assumed that an employee using the procedure acts in good faith and not for personal gain or out of personal motive, even if an investigation results in the concern proving unfounded, provided there were reasonable grounds for believing that the information disclosed indicated the commission of malpractice.

In addition, the Public Interest Disclosure Act 1998 is intended to protect employees and others raising concerns covered by the Act in good faith and on reasonable grounds from being subjected to detriment or dismissal for doing so.

This protection does not mean that if you are already the subject of disciplinary or other procedures relating to your employment, that those procedures will be halted as a result of your whistleblowing.

Abuse of the procedure by the malicious raising of unfounded allegations will be considered a serious disciplinary offence.

Anonymous Complaints

You are strongly encouraged to put your name to your concern. Concerns expressed anonymously are much less powerful, can be difficult to investigate effectively and may deprive those alleged to be guilty of malpractice of part of the means by which to defend themselves. Anonymous complaints may, however, be considered at the discretion of the Centre, taking into account the nature and seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

Recipients of anonymous complaints should refer them to the centre management team, who may, after taking into account the above factors, discuss the matter, initially informally, with the subject of the complaint. If the centre management team is satisfied that the complaint is totally without foundation, the complaint will be destroyed.

Contact details

Skills Funding Agency
Skills Funding Agency
Cheylesmore House
Quinton Road
Coventry
CV1 2WT
Telephone: 0845 377 5000

Department for Business, Innovation & Skills
1 Victoria Street
London SW1H 0ET
Telephone: 020 7215 5000

Public Concern at Work
3rd Floor, Bank Chambers
6 - 10 Borough High Street
London SE1 9QQ
Telephone: 020 7404 6609

UNISON North West Regional Centre
Arena Point
1 Hunts Bank
Manchester
M3 1UN
Telephone: 0845 355 0845