

# Whistleblowing Policy

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## Introduction

This document outlines Stanford Training Limited's policy and procedure for how an individual can confidentially and anonymously report concerns to STL regarding the delivery of regulated qualifications and ESFA funded apprenticeships.

The intended audience of this document is:

- STL staff
- All staff of employers associated with STL apprenticeship provision
- Learners registered on qualifications
- Apprentices
- Members of the public who suspect malpractice or maladministration is taking place or has taken place within STL.

## Purpose

The purpose of this document is to:

1. Outline in which instances an individual should inform STL of an allegation.
2. Outline how an individual can confidentially report suspected malpractice or maladministration to STL.
3. Outline how STL will protect the interests and confidentiality of whistleblowers, wherever this is possible.
4. Inform an individual how STL will respond to a whistleblowing allegation.

This policy is not applicable to individuals who wish to complain about a service provided by STL. If an individual wishes to complain about a service provided by STL, they should refer to the STL Complaints Policy.

## Policy

Whistleblowing is a term used to describe when an individual discloses concerns or information relating to potential malpractice or maladministration. Malpractice or maladministration can be committed by a Centre staff member, a learner, an employer or another third party.

If an individual has concerns regarding the practices of STL, a staff member or a Learner, they must first assess whether it would be appropriate to first report the concern to STL itself. If concerns are raised to STL and you are not satisfied that the concerns have been adequately investigated, or, that the issue is still occurring, you may wish to notify the awarding organisations, End Point Assessment organisations or ESFA directly and provide details of the action already taken.

There are a range of concerns that an individual may wish to raise under the External Whistleblowing Policy, including, but not limited to:

1. An individual suspects that STL, an STL staff member or a learner has committed, or is complicit with an instance of malpractice.

2. An individual suspects that STL is not compliant with the Awarding Organisation, End Point Assessment Organisation or ESFA Approval Criteria.
3. An individual suspects that STL, an STL staff member or a learner is involved in fraud or other illegal activity regarding qualifications or apprenticeships.
4. An individual has been asked, or forced, to perform an activity that they believe constitutes as malpractice.

Allegations which do not count as Whistleblowing:

It is important to note that personal grievances (for example bullying, harassment and discrimination) or dissatisfaction with the service received at STL (such as concerns regarding fees or contractual disputes) are not covered by this policy. If an individual has a concern of this type, they should follow the STL complaints policy or grievance procedure.

Whistleblowing does not apply to a learner making an appeal against STL or an assessment decision. STL has an Appeals Policy.

Individuals must refrain from making unwarranted allegations to STL (i.e. if an individual does not believe their allegation to be true). If an allegation was not confirmed by an STL investigation to hold any validity however the individual who has made the allegation had reason to believe it was true, no action will be taken against the individual. If, however, allegations are made by staff are deemed malicious or unfounded, STL may apply Sanctions against the individual or take legal action.

Confidentiality:

STL take all whistleblowing allegations seriously and will investigate disclosures in a sensitive and discreet manner. Individuals who make disclosures can have their identity kept confidential upon request. STL understands the importance of confidentiality for whistleblowers and, where it has been requested, will aim to protect an individual's anonymity, however this cannot be guaranteed.

STL is committed to ensuring that no individual who raises a genuine concern in good faith suffers any detriment, victimisation, or disadvantage as a result of making a disclosure. Any instance of victimisation will be regarded as a disciplinary matter and managed under STL's Disciplinary Policy.

It is important to note that STL may not be able to investigate a concern as effectively if an allegation is made to STL anonymously. STL encourages individuals to provide their name and contact details when raising their allegation, as we may need to contact the individual raising the concern for further information, or, to verify details provided throughout an investigation.

There may be instances where STL must reveal an individual's details, such as, if required to do so by law. Once an investigation into the allegations commences, individuals should also consider that they may be identifiable due to the nature, or content of, their allegations.

## Procedure

Identifying Malpractice:

In the first instance, where an individual suspects malpractice, they must first report it to the STL Operations and Business Development Manager, where it is appropriate to do so. STL will

investigate and respond to all concerns, as well as reporting all cases of suspected malpractice to the relevant external body.

If an individual does not feel able to report a concern directly to STL, or if they believe that their concern has not been handled appropriately, they may raise it externally with one of the following organisations:

- **Highfield Qualifications** – <https://www.highfieldqualifications.com/whistleblowing>
- **Ofqual (Office of Qualifications and Examinations Regulation)** – [whistleblowing@ofqual.gov.uk](mailto:whistleblowing@ofqual.gov.uk)
- **Education and Skills Funding Agency (ESFA)** – [complaints.esfa@education.gov.uk](mailto:complaints.esfa@education.gov.uk)
- **Apprenticeship Service Support** – via GOV.UK contact forms

These organisations can investigate concerns relating to the delivery, assessment, or management of regulated qualifications and apprenticeships.

## **Making an Allegation to STL**

If an individual wishes to raise an allegation of malpractice to STL, they should contact the designated Whistleblowing Officer.

Contact details: Akila Sharif  
Telephone: 0121 633 8100

If the concern involves the designated Whistleblowing Officer the allegation should instead be addressed to the Managing Director.

STL encourages individuals to notify STL of their concerns as soon as possible to minimise loss of information and ensure a timely investigation.

If an allegation is made by telephone, individuals may be asked to produce a written statement as supporting evidence. The name of the individual will be redacted from statements, upon the individual's request.

Although whistleblowers are not expected to prove an allegation, they will need to demonstrate that there are sufficient grounds for their concerns in order for STL to investigate. Therefore, whistleblowers should aim to provide as much information as possible regarding their concern. This includes, but is not limited to:

1. The background and history to the allegation.
2. Any specific details available including names, dates, times and places.
3. Details of any evidence which supports the concern.
4. Full details of the allegations, including the STL provision which is involved.
5. The individual's involvement, response and any personal interest they may have in the matter (if applicable).
6. How they think that things may be put right, if possible.

If, following receipt of an allegation, it is identified that the allegation was against an employer with whom STL works, the allegation will be passed onto the employer, who will follow their own whistleblowing procedure.

## How STL Will Respond

Once an allegation is made, the Operations and Business Development Manager will contact the individual who made the allegation within 5 working days to:

1. Confirm that the allegation has been received.
2. Indicate whether or not STL will be investigating the matter or not.
3. Request any further information which is required from the individual regarding the matter.

Initial enquires will be made to decide whether the allegation requires an investigation, and if so, in what form. If an investigation is required, the Operations and Business Development Manager will conduct this in line with the STL Malpractice and Maladministration Policy. STL Managing Director will be notified of all allegations received.

Although STL are able to confirm whether an investigation is open or closed to the whistleblower, STL are not required to release the outcomes of its investigations to individuals who raise allegations.

In cases of proven malpractice, STL will notify the relevant Awarding Organisation, End Point Assessment Organisation or Funding Bodies of the instigation and outcomes of STL's investigation.

STL will maintain a confidential log of all whistleblowing allegations, the actions taken, and the outcomes of any investigations. Records will be stored securely and retained for a minimum of six years in line with data protection legislation and the requirements of Awarding Organisations, End Point Assessment Organisations, and the ESFA.

Signed:

A handwritten signature in black ink, appearing to read "Mohamed Sowe", enclosed within a simple oval border.

Mohamed Sowe

**Policy Date:** 01/11/2025

**Next Review Date:** 31/10/2026