

 Integra Education North LTD trading as Let's Educate	Whistleblowing Policy	Ref:	POL/25
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Whistleblowing Policy

Version number: V1.0

Date approved: May 2026

Reason for production/revision: Updated to reflect current UK Government whistleblowing guidance and legislative developments

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Proposed next review date: May 2027

Related Policies

- Disciplinary Policy
- Grievance Policy
- Modern Slavery and Human Trafficking Policy
- Equality and Diversity Policy
- Code of Conduct
- Data Protection Policy

External References

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996
- Employment Rights Act 2025
- UK Corporate Governance Code
- ACAS Whistleblowing Guidance
- GOV.UK Whistleblowing Guidance for Employers
- GOV.UK Prescribed Persons and Bodies List

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Policy Statement

Let's Educate People is committed to maintaining the highest standards of openness, honesty, integrity, and accountability. We encourage a culture where individuals feel able to raise genuine concerns about wrongdoing or malpractice without fear of retaliation.

This policy provides a framework for reporting concerns safely, confidentially, and appropriately. Whistleblowing plays an important role in protecting colleagues, clients, the public, and the organisation itself by supporting legal compliance, ethical conduct, and good governance.

Purpose

The purpose of this policy is to:

- Encourage a culture of transparency and integrity
- Enable individuals to raise concerns confidentially and without fear
- Ensure concerns are investigated fairly and appropriately
- Provide protection for whistleblowers acting in good faith
- Promote compliance with legal and regulatory obligations

Scope

This policy applies to:

- All employees of Let's Educate People
- Contractors, consultants, and agency workers
- Suppliers and business partners
- Any individual working for or on behalf of Let's Educate People

Concerns may be raised even where the issue does not directly affect the individual making the disclosure.

What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing, malpractice, or illegal activity within the workplace.

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A disclosure may qualify for legal protection under the Public Interest Disclosure Act 1998 where the individual reasonably believes that:

- The disclosure is made in the public interest; and
- The information tends to show that wrongdoing has occurred, is occurring, or is likely to occur.

Individuals are not required to prove wrongdoing, only to raise concerns honestly and reasonably.

Types of Concerns to Report

Concerns covered under this policy may include, but are not limited to:

- Criminal offences (e.g. fraud, theft, bribery, corruption)
- Breaches of legal or regulatory obligations
- Miscarriages of justice
- Financial malpractice or sanctions breaches
- Sexual harassment or serious workplace misconduct
- Bullying, harassment, or victimisation linked to protected disclosures
- Abuse or endangerment of health and safety
- Environmental damage or harm
- Modern slavery or human trafficking concerns
- Deliberate concealment of wrongdoing
- Deliberate misuse of confidentiality agreements or NDAs to suppress legitimate concerns

This policy is not intended for personal employment grievances or disputes, which should be raised under the Grievance Policy.

Roles and Responsibilities

Corporate Board

- Ensure appropriate whistleblowing arrangements are in place
- Monitor whistleblowing trends and organisational risks

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- Promote an open and ethical culture

Senior Management

- Support implementation of this policy
- Encourage a positive “speak up” culture
- Ensure concerns are taken seriously and handled appropriately

Whistleblowing Officer (HR Director)

- Receive disclosures confidentially
- Manage investigations fairly and impartially
- Maintain appropriate records and reporting

All Staff

- Raise genuine concerns promptly and responsibly
- Co-operate with investigations where required
- Maintain confidentiality throughout the process

How to Raise a Concern

Individuals are encouraged to raise concerns as soon as possible.

Where possible, disclosures should include:

- A clear description of the concern
- Relevant dates, times, locations, or individuals involved
- Any supporting evidence available
- Details of whether the concern has previously been raised

Concerns may be raised verbally or in writing through one of the following channels:

- Line Manager
- HR Department
- Designated Whistleblowing Officer (HR Director)

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Anonymous disclosures will be considered seriously and investigated where sufficient information is provided, although anonymity may limit the ability to investigate fully or provide feedback.

Confidentiality and Protection

All disclosures will be treated sensitively and confidentially wherever possible.

Let's Educate People strictly prohibits retaliation against anyone who raises a concern in good faith. Retaliation may include:

- Dismissal
- Disciplinary action
- Threats or intimidation
- Harassment or bullying
- Discrimination
- Reduction in working hours or responsibilities
- Denial of opportunities or training
- Any other detrimental treatment

Any employee found to have subjected another individual to retaliation or victimisation may face disciplinary action.

Individuals who deliberately make false or malicious allegations may also be subject to disciplinary action.

Investigation Process

Upon receiving a concern:

1. Receipt of the disclosure will normally be acknowledged within 5 working days.
2. An initial assessment will normally be completed within 10 working days.
3. Where appropriate, a fair and objective investigation will be undertaken.
4. Investigations may involve interviews, evidence gathering, and consultation with relevant parties.
5. Outcomes and actions will be recorded appropriately.

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6. Feedback will be provided to the whistleblower where possible and lawful to do so.

If a concern relates to a serious legal or regulatory issue, Let's Educate People may refer the matter to the appropriate external authority.

External Reporting

Individuals may raise concerns externally with a prescribed regulator or relevant authority where they reasonably believe internal reporting is inappropriate or ineffective.

Examples may include:

- Health and Safety Executive (HSE)
- HM Revenue & Customs (HMRC)
- Financial Conduct Authority (FCA)
- Information Commissioner's Office (ICO)
- Ofcom
- ACAS

Further information can be found via the GOV.UK list of prescribed persons and bodies.

Employees may also seek confidential independent advice from:

Protect (formerly Public Concern at Work)

Website: www.protect-advice.org.uk

Telephone: 020 3117 2520

Data Protection

Personal data obtained during whistleblowing investigations will be processed confidentially and in accordance with UK GDPR and Let's Educate People's Data Protection Policy.

Information will only be shared where necessary and proportionate for investigation or legal purposes.

Monitoring and Review

This policy will be reviewed annually by the HR Director or sooner where legislative or organisational changes require.

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Anonymised whistleblowing data and trends will be reported periodically to the Corporate Board to support governance, oversight, and organisational learning.

Version Control

This policy aligns with:

- Version 1.0 - May 2026 - Original complaints procedure