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POLICY & PROCEDURES

WHISTLEBLOWING

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Crosby Training is committed to the highest standards of openness, probity, and accountability. This policy provides a framework for employees and workers to raise genuine concerns about suspected wrongdoing within the organisation.

Crosby Training encourages all employees and workers who have serious concerns about wrongdoing to come forward and express those concerns. This policy is primarily for matters where the interests of others, learners, or the organisation itself are at risk.

Any employee or worker who raises a genuine concern in the public interest may do so on a confidential basis without fear of reprisal or victimisation.

This policy reflects the requirements of the Public Interest Disclosure Act 1998, which protects individuals who disclose information about alleged wrongdoing at work where they reasonably believe the information to be substantially true and make the disclosure in the public interest.

This policy is intended for use with allegations that may involve misconduct, malpractice, breaches of law or regulation, threats to employees or learners, or other matters that may put the organisation or public interests at risk. All other matters should be raised through the appropriate policy.

1. SCOPE & DEFINITIONS

This policy applies to all employees and workers of Crosby Training. It also applies to agency staff, contractors, volunteers, and any other individuals engaged by the organisation, where relevant.

It covers genuine concerns about suspected wrongdoing, misconduct, malpractice, breaches of law or regulation, threats to employees, learners, or the public, or any deliberate concealment of such matters.

For the purposes of this policy:

Whistleblowing refers to the disclosure of information about wrongdoing in the workplace.

Wrongdoing may include, but is not limited to, criminal offences, breaches of legal obligations, miscarriage of justice, health or safety risks, safeguarding concerns, damage to the environment, or deliberate concealment of any of the above.



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Concerns that relate solely to an individual employment matter, personal grievance, or complaint about working conditions should normally be raised under the grievance or complaints procedure, unless they also involve wider wrongdoing.

2. PRINCIPLES

Crosby Training is committed to ensuring that all concerns are dealt with seriously, fairly, and without delay.

The organisation will:

- Treat all disclosures sensitively and impartially.
- Protect the identity of the person raising the concern where possible.
- Ensure that no employee or worker suffers harassment, victimisation, or detriment for raising a genuine concern.
- Investigate concerns promptly and proportionately.
- Maintain appropriate records of concerns and outcomes.
- Take action where wrongdoing is substantiated.

3. EMPLOYEE PROTECTIONS

Crosby Training will not tolerate harassment, victimisation, or any form of retaliation against employees who raise genuine concerns.

Employees and workers have the right to:

- Raise concerns confidentially, with their identity protected unless disclosure is legally required.
- Expect fair and impartial treatment throughout the investigation process.



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- Escalate concerns externally if they believe internal reporting has failed or if the matter involves serious risk to learners, staff, the public, or the organisation.

Examples of external channels may include regulators or professional bodies relevant to the concern.

All disclosures must be made in good faith. Employees who knowingly make malicious or false allegations are not protected under this policy.

Timescales:

- Acknowledgement of receipt of a concern will normally be provided within 5 working days.
- Employees will be updated on progress at regular intervals during any investigation.

4. ROLES & RESPONSIBILITIES

Employees / Workers: Responsible for reporting concerns promptly, providing as much detail and evidence as possible, and cooperating with any investigation.

Line Managers: Receive disclosures, provide initial guidance, assess the seriousness of the concern, and escalate to the CEO or investigating officer if required.

Chief Executive Officer (CEO): Acts as the escalation point if the concern involves a line manager or senior staff, or if the employee chooses to bypass line management.

Investigating Officers / Panels: Conduct impartial investigations, maintain confidentiality, document findings, and provide updates and outcomes within agreed timescales.

Investigating officers must ensure that all concerns are handled fairly, objectively, and in accordance with this policy.



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Timescales:

- Assessment of concerns should normally be completed within 10 working days of receipt.
- Formal investigations should be completed as quickly as reasonably possible, with progress updates provided to the employee at agreed intervals.

4.1 ALTERNATIVE ESCALATION FOR SENIOR STAFF

If the concern involves a senior leader or line manager, employees should raise it with a designated independent senior officer (e.g. a member of the Governance & Leadership Team) or another appropriately senior person not involved in the matter.

If no suitable internal alternative exists, or if the employee prefers, concerns may be escalated externally to the relevant regulator, funding body, or professional body, depending on the nature of the allegation.

All steps will continue to respect confidentiality and protection from retaliation, as outlined in the Employee Protection section.

5. PROCEDURE

Employees and workers wishing to make a disclosure should, in the first instance, raise their concern with their line manager.

If the disclosure concerns the line manager, the employee or worker should raise the concern with the Chief Executive Officer.

If the concern involves a senior leader, employees and workers should follow the alternative escalation route described in Section 4.1.



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Concerns may be raised verbally or in writing. Where possible, the person raising the concern should provide:

- The nature of the concern.
- The background and history of the issue.
- Relevant dates, times, and locations.
- The names of any individuals involved or witnesses.
- Any available evidence or documents.

Crosby Training will not tolerate harassment or victimisation of anyone raising a genuine concern. Employees and workers may request to raise concerns in confidence, and the identity of the person raising the concern will not be disclosed without consent unless disclosure is required by law or is necessary for a fair investigation.

In situations where concerns cannot be resolved without revealing the employee's identity, the matter will be discussed with the employee, and their consent sought before proceeding where practicable.

Anonymous concerns may be considered, but they may be harder to investigate fully.

6. INVESTIGATION

The person receiving the disclosure will consider the information and determine the appropriate form of investigation.

Investigations will be conducted impartially, sensitively, and as quickly as reasonably possible.

INVESTIGATION STEPS:

Acknowledgement: The employee or worker will normally receive written confirmation that their concern has been received, along with information on the next steps and expected timescales, within 5 working days where contact details are available.



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Assessment: The seriousness of the concern is evaluated to determine the appropriate course of action, including whether a formal investigation is required. This should normally be completed within 10 working days of receipt where possible.

FURTHER STEPS:

These may include:

- A formal investigation conducted by a suitable person or panel.
- Referral to a senior manager, trustee/governor, safeguarding lead, external specialist, or external agency where appropriate.
- Immediate protective action where there is a risk to learners, staff, or the public.

OUTCOME & FEEDBACK

Once the investigation is complete, the employee or worker may be informed of the outcome, subject to confidentiality, legal constraints, and the rights of others.

All investigation records will be documented and retained securely. Any adjustments required to ensure confidentiality or protection from reprisal will be implemented.

7. SAFEGUARDING & EXTERNAL REFERRAL

Where a concern relates to the safety or welfare of a learner, it must also be considered under the safeguarding policy and referred immediately through the safeguarding route where appropriate.

If a learner or vulnerable person is at immediate risk of harm, the concern must be escalated without delay to the appropriate safeguarding authority, and the police should be contacted if necessary.

This policy does not replace safeguarding procedures, and staff should use the most appropriate policy or route according to the nature and urgency of the concern.



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8. MONITORING & REVIEW

Crosby Training will monitor whistleblowing concerns to identify patterns, themes, and lessons learned.

The policy will be reviewed annually, or earlier if required by changes in law, regulation, safeguarding guidance, or organisational need.