



## Whistleblowing Policy

### Monitoring and Version Control

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# The Marketing Trainer

## Whistleblowing Policy

*(Reviewed in line with KCSIE 2025)*

## 1. Introduction

This policy sets out the procedure for raising concerns and whistleblowing at The Marketing Trainer.

We are committed to creating a culture of openness, honesty, and accountability, where employees, apprentices, employers, and partners feel able to raise genuine concerns without fear of victimisation or retaliation.

This policy aligns with the Public Interest Disclosure Act 1998, which protects individuals who disclose information in the public interest from detriment or dismissal

This policy ensures that:

- Concerns are dealt with appropriately and fairly.
- Individuals who raise concerns are protected.
- Safeguarding and the welfare of children remain the highest priority.

## 2. Scope

This policy applies to:

- All employees, volunteers, and contractors of The Marketing Trainer.
- Apprentices and employers working with The Marketing Trainer.
- Former employees who have concerns about actions that occurred during their employment.
- Individuals or organisations that have a business relationship with The Marketing Trainer.

## 3. Definition of Whistleblowing

Whistleblowing is the disclosure of information about suspected wrongdoing or malpractice which is in the public interest.

This may include, but is not limited to:

- Safeguarding concerns or failure to follow statutory guidance.
- Fraud, financial malpractice, or misuse of public funds.

- Health and safety risks.
- Harassment, bullying, or discrimination.
- Criminal activity or breach of legal obligations.
- Serious breaches of company policies.

## 4. Principles

This policy is based on the principles of the *Freedom to Speak Up Review* and the requirements of KCSIE 2025:

- **A safeguarding culture:** Safeguarding is everyone's responsibility.
- **Encouragement:** Concerns will always be taken seriously.
- **Protection:** Individuals who raise concerns will be protected from retaliation.
- **Confidentiality:** Identities will be kept confidential wherever possible.
- **Accountability:** Leaders and governors are responsible for ensuring whistleblowing arrangements are effective and accessible.
- **Improvement:** Concerns are used as opportunities for organisational learning.

While all concerns will be taken seriously, any deliberately false or malicious allegations may be treated as a disciplinary matter.

## 5. Whistleblowing Procedures

### Employees

- **Step 1: Safeguarding Concerns**  
If the concern relates to the safety or welfare of a child, you must report it immediately to the **Designated Safeguarding Lead (DSL)** or a Deputy DSL.  
If you believe a child is at immediate risk of harm, contact **Children's Social Care or the Police** straight away, and inform the DSL as soon as possible.
- **Step 2: Other Concerns**  
For all other concerns (e.g. malpractice, fraud), staff should first raise the issue with their line manager.
- **Step 3: Escalation**  
If you feel unable to raise the concern with your manager, or you are not satisfied with the response, contact a member of the **Senior Management Team (SMT)**.
- **Step 4: Investigation**  
The SMT will investigate the concern promptly and provide feedback.
- **Step 5: External Escalation**  
If the issue remains unresolved, you may escalate concerns externally (see Section 7: Important Contacts).

## Apprentices and Employers

- **Step 1:** Raise the concern with your designated **Coach**.
- **Step 2:** If unresolved, escalate to a member of the **SMT**.
- **Step 3:** If still unresolved, concerns may be taken externally (Ofsted, ESFA, DfE).

The SMT will aim to acknowledge all reports within 5 working days and complete investigations within 20 working days where possible

## Anonymous Reporting

Anonymous disclosures will be handled with care, but they may limit our ability to provide updates or gather further information necessary for a full investigation.

## Confidentiality & Protection

- All concerns will be treated in confidence unless disclosure is required by law.
- No whistleblower will suffer detriment, victimisation, or dismissal for raising concerns in good faith.

## 6. Low-Level Concerns

Concerns about staff behaviour that do not meet the threshold for whistleblowing (e.g. being late, minor conduct issues) should be reported under our **Safeguarding Policy** or **Staff Behaviour (Code of Conduct)** policy.

## 7. Important Contacts

- **DSL:** Mitchell Goodall – [mitch@themarketingtrainer.co.uk](mailto:mitch@themarketingtrainer.co.uk) – 07386 679 512
- **Deputies:**
  - Ashleigh Gorton – [ash@themarketingtrainer.co.uk](mailto:ash@themarketingtrainer.co.uk) – 07386 679 510
  - Andrew Smithson – [andy@themarketingtrainer.co.uk](mailto:andy@themarketingtrainer.co.uk) - 07386 679 511
- **Ofsted Whistleblowing Hotline:** 0300 123 3155
- **ESFA Whistleblowing Email:** [complaints.esfa@education.gov.uk](mailto:complaints.esfa@education.gov.uk)
- **DfE Whistleblowing Hotline:** 0370 000 2288

## **8. Training & Awareness**

- This policy is introduced at staff induction and refreshed annually.
- Apprentices and employers are made aware of the whistleblowing procedure during onboarding.

## **9. Role of the Governance Board**

The Governance Board provides independent oversight of whistleblowing arrangements at The Marketing Trainer. It ensures that concerns are handled fairly, promptly, and without conflict of interest. The Board reviews anonymised reports of whistleblowing activity annually to identify patterns, lessons learned, and areas for improvement. It holds the Senior Management Team accountable for maintaining a culture of openness, ensuring that individuals who raise concerns are protected from victimisation, and that appropriate actions are taken to address any substantiated issues.

## **10. Policy Review**

- This policy will be reviewed annually by the SMT and governance board.
- Updates will be communicated through official channels and version-controlled.