



Whistleblowing Policy

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Responsible Officer: Head of Human Resources
Approved by: Governors/ Senior Leadership Team / Other
Review Due: 12/02/27

Summary of Changes

Version	Review date	Comments
1.7	12/02/2026	Policy rebrand. A full review of the Whistleblowing Policy includes clear procedural stages. Identifies that staff must follow this policy to report a whistleblowing concern and learners and apprentices use the 3 Cs policy to make a whistleblowing complaint. Removed the terminology Safeguarding Concern from this policy.

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1. Purpose

The purpose of this policy and procedure is to provide employees, workers and governors (referred to as employees in this document, only for the purposes of this policy) with a confidential process for raising concerns about suspected serious malpractice. For example, disclosure of a suspected crime, so that it can be investigated appropriately without fear or retribution from the organisation.

This Policy aims to encourage and empower employees, learners, apprentices, and others to voice serious concerns without fear of victimisation, subsequent discrimination, or disadvantage.

Runway Training aim to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith

The Whistle Blowing Policy is intended to cover major concerns that fall outside the scope of other procedures.

This policy is not intended for grievances as these are dealt with under the Grievance Policy. This policy makes it clear that individuals raising a concern can do so without fear of victimisation, subsequent discrimination or disadvantage. The aim of the policy is to encourage employees to raise serious concerns via internal proceedings. However, the policy also provides an avenue for external disclosure, outlining protection arrangements in accordance with the Public Interest Disclosure Act, 1998 (PIDA, 1998). Last updated 2022.

2. Scope

The policy applies to all employees and other stakeholders at Runway Training offices, centres, and pop-up sites, including contractors working on Runway Training's premises, such as freelance staff. It also covers suppliers and service providers contracted to Runway Training operating on their own premises. If a learner or apprentice wishes to raise a concern or complaint regarding malpractice or wrongdoing, they should follow the Complaints Procedure outlined in the Learner Handbook.

The Public Interest Disclosure Act 1998 offers legal protection to workers against dismissal or other disciplinary actions as a result of raising serious concerns for which they have reasonable grounds, indicating malpractice or wrongdoing within the organisation.

3. Policy Statement

Employees and others directly involved in Runway Training's activities are often the first to realise that there may be something seriously wrong within the organisation. However, they may not voice their concerns because they believe that speaking out would be disloyal to their colleagues or the Company. They might also fear harassment or victimisation. In these situations, it can be easier to ignore the concern than to report what may only be a suspicion of malpractice.

Runway Training is committed to the highest standards of openness and accountability. In line with this commitment, we expect anyone involved with Runway Training activities who has serious concerns about any aspect of Runway Training's work to come forward and voice those concerns. It is recognised that most cases will need to be handled confidentially.

Runway Training commits to addressing any genuine concerns promptly and effectively, taking action against malpractice. Although false and malicious allegations may result in disciplinary measures against the complainant, employees can be confident that those raising concerns in good faith and following this procedure will have their intentions respected, their initiative welcomed, and their right to be free from retaliation protected.

The Public Interest Disclosure Act 1998 was enacted in July 1999. This legislation establishes a framework to encourage responsible and protected disclosures of concerns on the following matters:

- That a criminal offence has been, is being, or is likely to be committed.
- That a person has failed, is failing, or is likely to fail to comply with a legal obligation to which they are subject.
- That a miscarriage of justice has happened, is happening, or is likely to happen.
- That the health and safety of an individual has been, is being, or is likely to be endangered.
- That the environment has been, is being, or is likely to be damaged; and
- That information tending to show any matter falling within the matters above has been, is being, or is likely to be concealed.

4. Definitions

Whistleblowing

Whistleblowing occurs when an employee or worker reveals specific types of information, usually to the employer or a regulator, which they have become aware of through work. It can be defined as the disclosure of confidential information concerning a danger, fraud, or other illegal or unethical conduct related to the workplace, where the whistleblower lacks sufficient confidence in normal management procedures to address the misconduct. Typically, the misconduct involves a breach of law, rule, or regulation and/or poses a direct threat to others.

Whistleblowing does not include:

- Grievances about an employee's employment situation
- Complaints about terms and conditions
- Matters concerning learners or apprentices for which other forums exist
- Financial or business decisions that are taken by the CEO or other Senior Leaders, unless these decisions fall within the context of malpractice as described above

5. Procedures

These procedures are intended to address concerns in the public interest, provided they are made lawfully and without malice. Such concerns may include:

- criminal activity
- financial malpractice, impropriety or fraud
- failure to comply with legal obligations
- serious danger to health, safety and the environment
- professional malpractice
- improper conduct or ethical matter
- academic or professional malpractice
- abuse or misuse of Runway Training property
- attempts to conceal any of the above

Where such concerns have been raised in the public interest through this procedure, individuals will not face detriment as a consequence of the disclosure.

Anonymous Allegations

This policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at Runway Training's discretion.

In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

Raising a Concern

Step 1: Internal Management

If colleagues have concerns about malpractice, we encourage them to raise these first with their Line Manager, a more senior manager, or the HR Manager. This can be done verbally or in writing. Colleagues should clearly state the facts, explain the reason for their concern, and suggest how they would like it to be investigated. If colleagues have a direct or personal interest in the matter, they should inform us at this stage. When submitting this in writing, please provide your contact details so we can reach you.

Step 2: Alternative Internal Contacts

If colleagues are unable to raise the issue with someone in their immediate line management for any reason, they should contact the HR Manager. If colleagues wish to raise the matter confidentially, we will ensure that appropriate measures are taken to protect their identity. We will communicate with employees through the most secure methods available. We will not disclose a colleague's identity without their consent unless required by law.

If the concern relates to the HR Manager, they should raise their concerns with the CEO.

Step 3: External Contacts

If the concern relates to the CEO, it should be raised with the Chair of Governors.

If colleagues are unsure about following this policy or want to seek further independent advice, they can contact "Protect". This charity operates independently from Runway Training and specialises in offering free, confidential legal advice on raising concerns about serious malpractice at work. Protect will also advise on whether a situation can be appropriately reported to external bodies such as the Police.

Protect Telephone: +44 (0)20 3117 2520

The Green House
244-254 Cambridge Heath Rd
London

E2 9DA Free,
www.protect-advice.org.uk

Handling a Concern

When a concern is reported, we will review and assess the appropriate initial action. The colleague raising the concern may be asked for their opinion on how the matter might be best resolved. If we believe that a concern is more appropriately covered by other Company policies (e.g., 'Grievance Policy' or 'Bullying & Harassment Policy'), we will inform the colleague.

The Company will conduct the appropriate enquiries and/or investigations and will:

- Inform the colleague managing the matter and provide their contact details.
- Indicate whether further assistance from the colleague may be requested.
- If the colleague requests, they will be contacted in writing, with a summary of their concern and an outline of how the Company proposes to address it.

Within **ten** working days of a concern being raised, the responsible person will write to you:

- acknowledging that the concern has been received
- indicating how we propose to deal with the matter
- giving an estimate of how long it will take to provide a final response
- supplying you with information on relevant support mechanisms, and
- telling you whether further investigations will take place and, if not, why not

When a concern has enough substance or merit to warrant further action, Runway Training will take appropriate steps, including actions under any other Runway Training policy or procedure. Possible actions may include an internal or external investigation, referral to Runway Training's compliance or audit team, or referral to relevant external bodies such as the Police, Ofsted, the Health and Safety Executive, the Information Commissioner's Office, or the DfE.

If appropriate, any internal investigation will be carried out by an impartial manager, member of the SLT, Chair of Governors, or an external investigator appointed by Runway Training. Meetings will generally occur within 10 working days, with a trade union representative or workplace colleague present if suitable.

Timescales should remain adaptable, recognising that different concerns demand varying levels of investigation. Communication should be in writing, and updates on lengthy investigations should, where possible, include estimated timeframes for conclusion.

The amount of contact between the person(s) considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, Runway Training will seek further information from you.

Where any meeting is arranged, off-site if you so wish, you can be accompanied by a representative or a friend.

Runway Training will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, Runway Training will arrange for you to receive advice about the procedure.

Runway accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

While the aim of this policy is to allow the Company to investigate potential malpractice and take suitable action, we will provide colleagues with as much feedback as we practically can. If requested, we will confirm our response in writing. Please note, however, that we may not be able to respond with the specific action we take if doing so would breach a duty of confidentiality owed by us to someone else.

Following a Concern

If you are dissatisfied with our response, colleagues may escalate the matter to the other levels and bodies outlined in this policy. While the Company cannot guarantee that all issues will be addressed exactly as colleagues might wish, they will be handled fairly and properly. By following this policy, colleagues help us achieve this goal.

How the matter can be taken further

This policy is intended to provide you with a route within Runway to raise concerns. Runway Training hopes you will be satisfied with any action taken.

If you are still not satisfied you may feel it is right to take the matter outside of Runway Training

The following are possible contact points:

- Apprenticeship Funding Commissioner
- The Awarding Organisation (i.e. NCFE CACHE, City and Guilds, ILM)
- Your trade union
- Your local Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- The police

If you do take the matter outside of Runway, you need to ensure that you do not disclose otherwise confidential information.

Whistleblowing national guidance for employees can be found on the government website:
Whistleblowing for employees: What is a Whistleblower - <https://www.gov.uk/whistleblowing>

6. Monitoring

The HR Manager oversees ongoing monitoring of concerns and whistleblowing complaints received by Runway Training. Regular reports are presented to the SLT during meetings and to Governors at governor meetings. The data and actions outlined in these reports are used to inform improvements and strategic planning.

Compliance is checked regularly through:

- Staff training records
- SLT and Governor meetings
- Learner handbook
- Induction
- Feedback received from staff, learners, apprentices, employers, and other stakeholders
- Concerns and whistleblowing complaints received from staff, learners, apprentices, employers, and other stakeholders.
- Investigation reports and actions
- Disciplinary and Behaviour Records

Effectiveness will be measured through:

- The SLT and Governors' meeting minutes and actions
- Feedback received from staff, learners, apprentices, employers and other stakeholders and any improvements or alterations
- The number of concerns or whistleblowing complaints received and the way they are managed
- Robust recording of concerns and whistleblowing complaints
- Staff leaving the organisation or learners and apprentices not completing their programme of learning and leaving early due to concerns and whistleblowing complaints that have not been recognised or addressed.
- Specific feedback received from users of the whistleblowing procedures and their impact.
- Impact of training on concerns and whistleblowing complaints, for the SLT, governors, and staff
- The Organisational Risk Register does not recognise poor concern/whistleblowing complaint handling as a risk to the business.
- Progress on the Action Points of the Quality Improvement Plan

7. Linked Policies

- Fraud Protection and Prevention and Anti-Bribery
- Safeguarding and Child Protection
- Equality, Diversity and Inclusion and Anti-Bullying and Harassment
- Health and Safety and Welfare
- Data Protection

8. Legislation and Guidance

- Public Interest Disclosure Act, 1998 (PIDA, 1998). Last updated 2022
- HM Treasury's Managing Public Money publication, updated May 2023
- Malicious Communications Act 2003, updated 2024

9. Review

This policy will be reviewed annually and updated accordingly by the Governance Board. Where necessary, the review will be more frequent to ensure compliance with current legislation. The HR Manager will be responsible for this policy.