

# Ginger Nut Training.



## Document Title

**Whistleblowing Policy**

## Originator

**Quality & Compliance Lead**

## Responsible Person

**Quality & Compliance Lead**

## Date of Approval

**April 2026**

## Policy Due for Renewal

**April 2027**

Version

**1.3**

## What is Whistleblowing?

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

To be covered by whistleblowing law, the individual must make a qualifying disclosure of information, and the information must relate to one of the types of relevant failures set out above.

Ginger Nut Training recognises that under the Ofsted 2025 Education Inspection Framework, safeguarding is evaluated as a distinct area and is judged as 'Met' or 'Not Met'. We are committed to maintaining a strong and proactive safeguarding culture in which concerns are identified early, reported appropriately, and handled in line with statutory requirements and sector best practice.

All whistleblowing concerns relating to the safety or welfare of learners will receive immediate prioritisation and will be handled in accordance with our safeguarding procedures and the Keeping Children Safe in Education (KCSIE) requirements. This includes the reporting of low-level concerns, which may not meet the harm threshold but could indicate emerging risks.

Our processes support Ofsted's emphasis on robust safeguarding systems, clear reporting routes, effective governance oversight, and an organisational culture in which learners and staff feel safe to speak up. See here for our Safeguarding Policy [Safeguarding Policy](#)

We actively promote a speak-up culture in which staff, learners and stakeholders feel psychologically safe to raise concerns without fear. We reinforce this through training, communication and feedback mechanisms to ensure confidence in reporting concerns.

Anonymised whistleblowing themes, trends and outcomes will be reported to Senior Leadership and the Board on a termly basis as part of our governance cycle and Apprenticeship Accountability Framework compliance, ensuring effective oversight and continuous improvement.

## This policy

---

This Policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity 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 made any disclosure in good faith.
- This policy does not cover personal employment disputes or grievances such as disagreements about workload, pay, or line-management decisions. These should be raised through the Grievance Procedure unless they involve wrongdoing in the public interest.

All staff receive whistleblowing training at induction and regular refresher updates to ensure awareness of reporting routes and responsibilities.

The Policy applies to all:

- Apprentices and Employers under the Apprenticeship Agreement for Ginger Nut Training's Apprenticeship training services.
- Employees of Ginger Nut Media Ltd.
- Those providing services under a contract or other agreement with Ginger Nut Media Ltd.

Clear and accessible reporting routes are made available to learners and apprentices, including age-appropriate guidance and anonymous options.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. We cannot promise not to act against such an employee, but the fact that they came forward will be taken into consideration.

Disclosures made under this policy contribute directly to the organisation's ability to meet the **Leadership & Governance** expectations set out in the Ofsted Report Card, including:

- promoting a transparent and accountable culture;
- ensuring safeguarding concerns are escalated and acted upon;
- enabling leaders and governors to identify organisational risks early;
- demonstrating that staff are valued, heard and protected when raising concerns.
- This includes the reporting of *low-level concerns*, which may not meet the harm threshold but could indicate emerging risks and are essential to maintaining a strong safeguarding culture.

Ginger Nut Training is committed to responding to whistleblowing disclosures in a manner that reflects Ofsted's strengthened evaluation of leadership, governance, inclusion and wellbeing.

## Confidentiality

---

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

## Who should you raise your concerns with?

---

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns with:

- Your Line Manager
- A Company Director
- By using the Whistleblowing Form: [Whistleblowing Form – Ginger Nut Training](#)

## How to raise a concern

---

There are several options for raising a concern. You can do this in person, via email, telephone, or post.

To raise a concern anonymously, please use the Whistleblowing Form on our website:

[Whistleblowing Form – Ginger Nut Training](#)

The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- The nature of your concern and why you believe it to be true.
- The background and history of the concern (giving relevant dates if possible).

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

While anonymous disclosures will always be reviewed, anonymity may limit our ability to gather further information, investigate fully, or provide feedback. Providing contact details, where possible, may support a more effective investigation.

## What we will do

We will arrange a meeting with you as soon as possible to discuss your concern. Do not forget that testing your concerns is not the same as either accepting or rejecting them. You may invite a colleague to be present for support during any meetings or interviews in connection with the concerns you have raised. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. Any meeting can be arranged away from your workplace.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- be referred and put through established child protection/abuse procedures
- form the subject of an independent inquiry

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

- acknowledging that the concern has been received
- indicating how we propose to deal with the matter
- supplying you with information on staff support mechanisms
- telling you whether further investigations will take place and if not, why not.

The amount of contact between you and the Director considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Ginger Nut Media will do what it can to minimise any difficulties that you may experience as



a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, we will arrange for you to receive appropriate advice and support. You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

## How the matter can be taken further

---

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

This Policy does not prevent you from seeking your own legal advice.

## Protection and support for whistleblowers

---

Ginger Nut Training complies with the Public Interest Disclosure Act 1998 (PIDA). Workers making a protected disclosure in the public interest are legally protected from dismissal, detriment or victimisation as a result of raising concerns.

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform a director immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Throughout this process:



- you will be given full support from senior management.
- your concerns will be taken seriously, and
- We will do all it can to help you throughout the investigation.

### Protect operates a confidential helpline:

Protect Independent whistleblowing charity	Helpline: 0203 117 2520 Email: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="https://protect-advice.org.uk">https://protect-advice.org.uk</a>
--	--

## Further Escalation

---

If the whistleblower is not satisfied with the response from Ginger Nut Training, they may escalate their concern to the DfE.

### Reporting Concerns Directly to Ofsted

If your concern relates to safeguarding, serious misuse of public funds, or significant risks to learners, and you believe it has not been adequately addressed internally, you may report it directly to Ofsted.

#### Ofsted Whistleblowing Team

Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

Telephone: **0300 123 3155**

Online: **Ofsted online concern form (for providers and the public)** [Ofsted](#)

Concerns sent to Ofsted should relate to the safety and wellbeing of learners, leadership or governance failures, or evidence that the organisation is not meeting Ofsted regulatory expectations.

Making a disclosure to Ofsted does not replace your right to contact the DFE or other statutory bodies.

Concerns raised through this policy contribute to continuous improvement, helping us strengthen safeguarding, leadership oversight and organisational effectiveness.

### Version Control

Version	Date	Author	Summary of changes
1.0	April 2025	Quality Assurer	Policy Updates
1.1	April 2026	Q&C Lead	Updated to reflect Ofsted EIF 2025 Changes, Safeguarding and governance enhancements

*J Celino*

[J Celino \(Mar 31, 2026 14:50:13 GMT+1\)](#)

*Dan Williams*

[Dan Williams \(Mar 31, 2026 14:55:43 GMT+1\)](#)













# 2026 Whistleblowing Policy Final

Final Audit Report

2026-03-31

Created:	2026-03-31
By:	Ginger Nut Training (delivery@gingernuttraining.co.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAAj2CXTgaanQxCdDjPiB9S81_w20edXkgI

## "2026 Whistleblowing Policy Final" History

-  Document created by Ginger Nut Training (delivery@gingernuttraining.co.uk)  
2026-03-31 - 1:46:22 PM GMT
-  Document emailed to jacqui.celino@gingernuttraining.co.uk for signature  
2026-03-31 - 1:46:27 PM GMT
-  Email viewed by jacqui.celino@gingernuttraining.co.uk  
2026-03-31 - 1:49:51 PM GMT
-  Signer jacqui.celino@gingernuttraining.co.uk entered name at signing as J Celino  
2026-03-31 - 1:50:11 PM GMT
-  Document e-signed by J Celino (jacqui.celino@gingernuttraining.co.uk)  
Signature Date: 2026-03-31 - 1:50:13 PM GMT - Time Source: server
-  Document emailed to dan.williams@gingernut.co.uk for signature  
2026-03-31 - 1:50:16 PM GMT
-  Email viewed by dan.williams@gingernut.co.uk  
2026-03-31 - 1:55:12 PM GMT
-  Signer dan.williams@gingernut.co.uk entered name at signing as Dan Williams  
2026-03-31 - 1:55:41 PM GMT
-  Document e-signed by Dan Williams (dan.williams@gingernut.co.uk)  
Signature Date: 2026-03-31 - 1:55:43 PM GMT - Time Source: server
-  Agreement completed.  
2026-03-31 - 1:55:43 PM GMT