

Whistleblowing Policy

Approved: April 2025 | Review Due: April 2026

Key Themes

This policy is underpinned by the following principles:

- Openness and transparency in raising concerns.
- Protection of individuals making disclosures in good faith.
- Confidentiality and lawful handling of information.
- Independent oversight and accountability.
- Compliance with statutory, regulatory and funding requirements.
- Safeguarding of learners, staff and the public.
- Continuous improvement and learning culture.

1. Purpose and Scope

Salt Training Limited ("the College") is committed to the highest standards of openness, integrity and accountability. This policy provides a clear framework for employees, governors, contractors, volunteers and apprentices to raise concerns about wrongdoing, malpractice or safeguarding issues in a safe, confidential and legally protected way.

2. Legal and Regulatory Framework

This policy complies with:

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996
- Bribery Act 2010
- ESFA Post-16 Audit Code and Funding Guidance
- Ofsted safeguarding and culture expectations
- UK GDPR and Data Protection Act 2018

3. Definitions

Protected Disclosure – is a legal term in the UK that refers to a disclosure of information by a worker about wrongdoing, usually in the workplace, that is protected under the Public Interest Disclosure Act 1998 (PIDA). This is often known as "whistleblowing."

Prescribed Body – An external organisation authorised to receive whistleblowing disclosures under PIDA.

Whistleblower – Any individual raising a concern under this policy.

Safeguarding – Action taken to protect the welfare of children, young people and vulnerable adults.

Whistleblowing concerns – A public-interest disclosure

Policy Owner: Chair Of Governors

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Personal grievances- Handled via Grievance Policy

Safeguarding reports- Handled via Safeguarding Policy

Extremism & Radicalisation- The risk of a person being radicalised

Prevent Duty breaches-;

- Failing to have policies or procedures in place to identify and manage risks of radicalisation.
- Not training staff on how to spot and report concerns about radicalisation.
- Ignoring or inadequately responding to signs that a learner or staff member may be at risk of extremism.
- Not making appropriate referrals (e.g., to the Channel programme) when there are safeguarding concerns.
- Failing to maintain appropriate records of Prevent-related incidents or actions taken.

4. Specific Subject Matter

A protected disclosure relates to information that the individual reasonably believes shows one or more of the following:

- 4.1 A criminal offence has been, is being, or is likely to be committed.
- 4.2 A failure to comply with any legal obligation.
- 4.3 A miscarriage of justice.
- 4.4 A risk to health or safety of any individual.
- 4.5 Environmental damage.
- 4.6 Deliberate concealment of any of the above.
- 4.7 Financial irregularities, misuse of public funds or ESFA funding breaches.
- 4.8 Safeguarding concerns involving learners, staff or the public.

5. Reporting Routes and Escalation

Concerns may be raised via any of the following routes:

- Line Manager (where appropriate)
- Managing Director
- Safeguarding Lead
- HR Manager
- Chair of Governors (independent route)

If a concern involves senior leadership, or where the individual feels unable to raise the matter internally, the Chair of Governors should be contacted directly.

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Where the initial route does not resolve the concern satisfactorily, escalation may be made to the Chair of Governors or an appropriate external prescribed body. Such As;

- Education Skills Funding Agency (ESFA)
- OFSTED
- Department of Education (DfE)

- Local Authority Designated Officer (LADO)
- Health and Safety Executive (HSE)
- Information Commissioners Office (ICO)
- Police

Serious malpractice, criminality or safeguarding concerns may be escalated immediately without prior internal reporting.

6. Confidentiality, Anonymity and Data Protection

Anonymous disclosures are accepted. Anonymity will be respected wherever possible, although this may limit the ability to investigate fully.

Information will be handled confidentially and stored securely in line with UK GDPR and the Data Protection Act. Access will be restricted to authorised individuals only.

Confidentiality may be breached where legally required, or where there is a safeguarding or criminal risk that requires referral to statutory agencies as part of the our legal duty. In this case information will be shared with statutory agencies on a need to know basis to maintain confidentiality.

Generic shared inboxes will not be used for confidential disclosures.

7. Investigation Process

All concerns will be acknowledged within five working days where contact details are provided.

The Managing Director (or Chair of Governors where appropriate) will appoint an investigating officer with sufficient independence and competence.

Investigations will be proportionate, documented and subject to governance oversight. Records will be retained securely in line with data protection requirements.

Indicative timescales will be communicated to the whistleblower where possible. Regular and appropriate feedback will be provided to whistleblowers to ensure reasonable updates, Explanation of any confidentiality limits and outcomes communication where lawful.

Outcomes will be communicated where legally appropriate and subject to confidentiality constraints.

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Support will be available to whistleblowers throughout the process, including access to HR or external support where appropriate.
Data retention will be in line with GDPR and our Data retention policy with investigation records be retained for 7 years.

8. Protection from Detriment

No individual will suffer detriment, victimisation or disciplinary action for raising concerns in good faith. Any retaliation will be treated as a disciplinary matter.

9. Governance Oversight and Quality Assurance

The Board of Governors will monitor whistleblowing activity, themes, outcomes and compliance to ensure transparency, accountability and continuous improvement.

10. Contact Details

Chair of Governors – Confidential route Nicola.Kelly@salt-college.co.uk

Managing Director – Kurt.salter@salt-college.co.uk

Safeguarding Lead – safeguarding@salt-college.co.uk

Postal Address:
Salt Training Limited
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Approved by:

Position:

Date:

Signature:

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