edt

Global Whistleblowing Policy

All policies and procedures are version controlled.
The most up to date versions are all available on edt's Internal SharePoint site.
If you have questions about how to interpret this policy, please ask the Policy Owner.

Document Control

Document Control	
Title:	Global Whistleblowing Policy
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Owner:	HR Director
Business Area:	People
Classification:	Internal & External
Date of next review:	21/04/2028

Document Distribution / Stakeholders

Document Distribution / Stakeholders				
Name	Organisation	Date issued	Version	Action
All staff	edt	25/06/2026	9.0	All staff to read the policy. Policy to be added to policy hub. Comms to be sent out.
All staff	edt	12/08/2025	8.0	All staff to read the policy. Policy to be added to policy hub. Comms to be sent out.

Document Revision History

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Version	Date	Author	Summary of changes
9.0	08/04/2026	M. Sefton	Inclusion of sexual harassment as a protected disclosure. Minor updates to personnel names and streamlining of internal reporting routes.
8.0	12/08/2025	HR Projects Lead (Policy, Wellbeing & Compliance)	Approved
7.1	05/08/2025	L. Richardson A. Hawkins	Template change for approval. No changes to content of policy.
7.0	05/04/2025	S. Farquar	Approved - Routine – Annual Review
6.1	01/07/2024	S. Farquar	Review/Approved - Minor – Change of AFC Chair
6.0	07/12/2023	S. Farquar	Approved - Routine – Annual Review

Scope

We want all employees and stakeholders to feel safe raising concerns about unacceptable practice and misconduct: this policy helps you do so. We recognise this can take courage and confidence: we are committed to supporting you throughout the process.

The policy applies to everyone associated with edt, including employees, Trustees, consultants, contractors, agency workers, apprentices and employees or representatives of partner organisations. It reflects the UK Public Interest Disclosure Act (PIDA) 1998 (the Act), which protects workers from unfair dismissal or 'detrimental treatment' if they make a protected Qualifying Disclosure (see Appendix 1).

The Policy is not designed for questioning business decisions, for employment grievances, or other aspects of the working relationship, all of which are dealt with under separate policies.

Policy

If you discover information which you believe to show malpractice or wrongdoing at edt, you should disclose it as soon as possible via the most appropriate of the following channels: -

- A senior manager or executive leadership team member
- Submit a report to edt's confidential email: **confidentialconcerns@educationdevelopmenttrust.com**

A Disclosure Form is provided in Appendix 2 to help you report your concern.

This Whistleblowing Policy will be posted on the organisation's website and is available in multiple languages via the Recite Me accessibility tool.

If you are confident in the veracity of your disclosure, you should feel assured in reporting it as part of your duty to edt and will receive support throughout the process.

Whistleblowers have legal protection from retaliation. If you suffer any detriment, harassment or victimisation as a result of the disclosure you have made, you should tell your line manager if appropriate to do so, a senior manager or contact HR. The organisation strictly prohibits retaliation against any employee for making a protected disclosure. Any detriment, reprisal, threats, or harassment, where proven, will result in disciplinary action, which could include termination of employment. An investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that may already affect an employee.

You are encouraged to put your name to your concern wherever possible. Anonymous concerns will still be considered, taking into account factors such as seriousness, credibility and the likelihood of confirming the allegation from other attributable sources.

Disclosures will by default be handled in confidence. Where an allegation is particularly serious it may be necessary to take protective action and / or refer the matter to the police. If

there is a legal requirement to disclose your identity with appropriate authorities, you will be consulted first.

Edt will aim to resolve whistleblower concerns as quickly as reasonably possible depending on the complexity of the investigation. Whistleblowers will not necessarily be consulted or involved in an enquiry but will receive confirmation that their disclosure is being addressed and may be notified when the matter is closed, depending on whether the concern is raised anonymously or not.

If you raise a concern in good faith that is then not confirmed by investigation, the case will be closed and remain confidential.

If a concern is found to be deliberately false or made in bad faith, disciplinary action will be taken, or other relevant action if a false concern is raised by a consultant/partners or non-employee.

If you need to report a safeguarding concern involving employees, consultants or partner staff, a direct report can be made to Marisa Sefton, Head of Safeguarding. More information about safeguarding reporting can be found on the **Safeguarding SharePoint Pages** If you wish to make a report about safeguarding malpractice (illegal practice or systemic safeguarding concerns) a whistleblowing report under this policy can be made.

If you believe a disclosure is not being handled effectively, please contact the Chair of Audit and Finance Committee **@Anne Tutt.** If after that you still believe that edt has not dealt with a concern properly, in the UK only, you should contact one of the prescribed bodies under the Act (see Appendix 1).

Roles and Responsibilities

All staff and anyone disclosing is responsible for reading this policy, making disclosures in good faith and attending related meetings where necessary.

Line Managers are responsible for providing support to the discloser, where relevant; escalating emerging concerns promptly to senior management or to the Executive Leadership Team.

Senior Managers are responsible for ensuring that disclosers and witnesses receive appropriate support throughout an enquiry process; that emerging concerns are escalated promptly to the Executive Leadership Team, and for participating in investigations, as required.

The HR Director is responsible for convening a team to assess and investigate a disclosure; deciding on the involvement of outside agencies (including the police); sourcing legal advice as required; escalating to the Executive Leadership Team and / or the Chair of Audit and Finance Committee, where appropriate.

The Chair of the Audit and Finance Committee **@Anne Tutt** is responsible for acting as final internal point of escalation and arbiter of the disclosure.

The Audit and Finance Committee is responsible for reviewing the Whistleblowing Policy and environment annually and reporting to Trustees.

Related Documents

Regulatory

- Public Interest Disclosure Act (PIDA) 1998 (UK)
- The Employment Rights Act 2025 – sexual harassment is treated as a qualifying disclosure

Policies

- Bullying and Harassment in the Workplace (re: harassment / bullying in the workplace)
- Code of Conduct (including overview of policies)
- Conflict of Interests Policy
- Data Protection Policy (including data subject requests)
- Disciplinary Policy and procedure
- Duty of Care Policy (protection from exposure to unnecessary risk)
- Global Safeguarding Policy (re: reporting / handling all safeguarding concerns & safeguarding whistleblowing to external agents)
- Grievance Policy (re: internal mediation for workplace issues)
- Health and Safety Policy (re: high HSE failure including corporate manslaughter)
- Inclusion and Diversity Policy (re: discrimination related to a protected characteristic)
- IT Acceptable Usage Policy (including access to / dissemination of information)
- Protection from Sexual Exploitation, Abuse and Harassment (SEAH) Policy
- Use of Social Media Policy (re: unacceptable sites and information sharing)
- Sexual Harassment in the Workplace Policy (re: sexual harassment in the workplace)

Procedures / guidance / forms

- Whistleblowing Disclosure Form (Appendix 2).

Appendix One

Qualifying Disclosure

Under the Act, a Qualifying Disclosure is a disclosure that you reasonably believe one of the following matters is either happening now, took place in the past, or is likely to happen in the future. The Act provides protection for workers who raise a Qualifying Disclosures. Examples include: -

- a criminal offence;
- the breach of a legal obligation;
- a miscarriage of justice;
- a danger to the health and safety of any individual, including a safeguarding matter;
- sexual harassment (that has occurred, is occurring or is likely to occur);
- damage to the environment;
- a conflict of interest;
- deliberate concealment of information tending to show any of the above matters;
- gross mismanagement;
- gross waste of funds;
- abuse of authority.

A Qualifying Disclosure will be 'protected' provided you:

- make the disclosure in good faith; and
- reasonably believe that the information disclosed, and any allegation is substantially true.

The Charity Commission

You can also whistleblow to edt's regulator in England, The Charity Commission, if you think that a disclosure made under this policy has not been handled effectively by edt:
Report serious wrongdoing at a charity as a worker or volunteer - GOV.UK

Whistleblowing: UK Government List of Prescribed People and Bodies
Whistleblowing: list of prescribed people and bodies - GOV.UK

Appendix Two

Whistleblowing Disclosure Form

Whistleblowing - Formal public interest disclosure Mail to: **confidentialconcerns@educationdevelopmenttrust.com**			
Use this form to report wrongdoing. First read the Whistleblowing Policy to see if your concern qualifies as whistleblowing. You can report a concern without filling the form – the form shows what sort of information is needed. If you are unsure what to do, contact Suzie Walker, HR Director			
Your name		Your email	
Date of disclosure		Does this disclosure relate to your line manager?	Yes / No
Summary of Disclosure			
Describe your concern. Give examples, including where possible dates / times, locations.			
Individuals involved			
Give names and contact details of people involved in your concerns, including witnesses.			

Whistleblowing - Formal public interest disclosure Mail to: **confidentialconcerns@educationdevelopmenttrust.com**	
Outcome requested	
How you would like to see the issue dealt with / how you believe this will resolve the issue.	
Declaration:	
I confirm the above statements are true to the best of my knowledge and belief. I understand that if I knowingly make false allegations edt may take disciplinary action against me.	
Signature	Date: