

BPIF
TRAINING

WHISTLEBLOWING **POLICY**

BPIF TRAINING LIMITED

Version 2.0 | July 2026

1 PURPOSE

BPIF Training Limited is committed to conducting its business with honesty, integrity and accountability.

This policy provides a mechanism for employees, workers, contractors, associates and other individuals connected with BPIF Training to raise concerns about suspected wrongdoing, misconduct, illegal activity or risks within the organisation.

BPIF Training encourages individuals to speak up where they have genuine concerns. Concerns raised under this policy will be taken seriously and investigated appropriately.

No individual will suffer any detriment, victimisation or retaliation for raising a genuine concern in good faith.

2 SCOPE

This policy applies to:

- ◆ Employees
- ◆ Directors
- ◆ Apprentices employed by BPIF Training
- ◆ Agency workers
- ◆ Consultants
- ◆ Contractors
- ◆ Volunteers
- ◆ Associates working with BPIF Training

3 WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information relating to suspected wrongdoing that is in the public interest.

Examples include concerns that:

- ◆ A criminal offence has been committed, is being committed or is likely to be committed.
- ◆ Fraud or financial malpractice has occurred.
- ◆ Funding rules are being deliberately breached.
- ◆ Safeguarding concerns are being ignored.
- ◆ A miscarriage of justice has occurred.
- ◆ Health and safety is being endangered.
- ◆ The environment is being damaged.
- ◆ Data protection laws are being breached.

- ◆ A legal or regulatory obligation is being breached.
- ◆ Information relating to any of the above is being deliberately concealed.

A worker does not need proof of wrongdoing. A reasonable belief that wrongdoing may have occurred is sufficient.

4 MATTERS COVERED BY OTHER PROCEDURES

This policy is not normally intended for:

- ◆ Personal employment disputes
- ◆ Grievances relating to an individual's own employment
- ◆ Pay disputes
- ◆ Performance management concerns

These issues should normally be raised through BPIF Training's Grievance Procedure.

However, where a personal complaint also involves wider wrongdoing or breaches of law, this policy may apply.

5 OUR COMMITMENT

BPIF Training will:

- ◆ Treat all concerns seriously.
- ◆ Investigate concerns promptly and fairly.
- ◆ Maintain confidentiality wherever possible.
- ◆ Protect individuals making disclosures in good faith.
- ◆ Take appropriate corrective action where required.
- ◆ Comply with all relevant legal obligations.

No employee will be dismissed, disciplined, disadvantaged or suffer retaliation for making a genuine disclosure under this policy.

Any victimisation of a whistleblower may result in disciplinary action.

6 FALSE OR MALICIOUS ALLEGATIONS

Individuals must raise concerns honestly and in good faith.

Knowingly making a false or malicious allegation may result in disciplinary action.

However, a disclosure made in good faith will not result in disciplinary action simply because an investigation concludes that no wrongdoing occurred.

7 CONFIDENTIALITY

BPIF Training will make every effort to protect the identity of anyone raising a concern.

Information will only be shared where necessary to investigate the matter or where required by law.

Individuals may make disclosures anonymously, although this can make investigations more difficult.

8 REPORTING A CONCERN

Concerns should be raised through the stages below. Move to the next stage where the previous stage is not appropriate or has not resolved the matter.

STAGE 1 — LINE MANAGER

In the first instance, concerns should normally be raised with your line manager, either verbally or in writing.

Information provided should include:

- ◆ Details of the concern
- ◆ Dates and times where relevant
- ◆ Names of those involved
- ◆ Any supporting evidence available

STAGE 2 — OPERATIONS DIRECTOR

Contact the Operations Director if the concern involves your line manager, you do not feel comfortable raising it with them, or you believe it has not been adequately addressed.

Contact	Max Walkington
Role	Operations Director, BPIF Training Limited
Email	enquiries@bpiftraining.co.uk

STAGE 3 — MANAGING DIRECTOR

Escalate to the Managing Director if the concern involves the Operations Director or remains unresolved.

Contact	Karly Lattimore
Role	Managing Director, BPIF Training Limited
Email	enquiries@bpiftraining.co.uk

9 INVESTIGATION PROCESS

Following receipt of a concern:

1. The concern will be acknowledged.
2. An initial assessment will be undertaken.
3. An investigation officer may be appointed.

4. Relevant evidence will be reviewed.
5. Witnesses may be interviewed where necessary.
6. Appropriate action will be identified and implemented.

Possible outcomes

- ◆ No further action required
- ◆ Additional monitoring
- ◆ Process improvements
- ◆ Staff training
- ◆ Disciplinary action
- ◆ Referral to external authorities

Where appropriate, the individual raising the concern will be informed of the outcome.

10 FAILURE TO RAISE CONCERNS

Any attempt to:

- ◆ Prevent a worker from raising a concern;
- ◆ Encourage concealment of wrongdoing; or
- ◆ Victimise a whistleblower

...may be treated as gross misconduct.

11 EXTERNAL DISCLOSURE

BPIF Training encourages concerns to be raised internally wherever possible.

However, where an individual reasonably believes that concerns have not been addressed appropriately, they may contact an appropriate prescribed body.

Relevant bodies may include

- | | |
|--|---|
| ◆ Education and Skills Funding Agency (ESFA) | ◆ Serious Fraud Office (SFO) |
| ◆ Ofsted | ◆ Environment Agency |
| ◆ Health and Safety Executive (HSE) | ◆ Competition and Markets Authority (CMA) |
| ◆ Information Commissioner's Office (ICO) | ◆ Financial Conduct Authority (FCA) |
| ◆ HM Revenue & Customs (HMRC) | ◆ Police |

Individuals should ensure that any external disclosure is made responsibly and within the protections provided by whistleblowing legislation.

12 POLICY REVIEW

This policy will be reviewed periodically to ensure ongoing compliance with legal requirements and best practice.

Policy owner	Managing Director
Approved by	Managing Director, BPIF Training Limited
Version	2.0
Date of issue	July 2026
Next review date	July 2027
Applies to	All employees, directors, apprentices, agency workers, consultants, contractors, volunteers and associates

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SPEAK UP. WE WILL LISTEN.

enquiries@bpiftraining.co.uk | www.bpif.training