

WHISTLEBLOWING POLICY

Revision history

Version	Revisions made	Date approved	Approved by
1.4	Owner Changed	26 September 2008	Judith Shepherd
2		24 October 2011	Management Board
		24 November 2011	Audit and Risk Committee
3	Amendments in line with the Enterprise and Regulatory Reform Act 2013	22 August 2014	Management Board
		11 September 2014	Audit and Risk Committee
3.1	General update	17 November 2016	Audit and Risk Committee
3.2	Update to Protection for Whistleblowers	3 March 2020	Group Legal
3.3	General update	9 June 2021	Group Legal
3.4	General update	16 March 2022	Legal Department
3.5	Update of contact details	20 July 2022	Legal Department
3.6	Update to include alternative reporting options	25 April 2023	Legal Department
4	General update	28 October 2025	Head of Legal

Review date

This Policy will be reviewed every 3 years (or more often if necessary). The next review date is **28 October 2028**.

1 Introduction

City & Guilds is committed to the highest standards of conduct and integrity in its business activities in the UK and overseas. This requires honesty and integrity in all areas of the business and a culture of openness between all staff, contractors and suppliers.

We encourage those that have any concerns about any aspect of the work of City & Guilds to come forward and voice those concerns. We recognise that whistleblowing and questioning the activities of others can be difficult, details of support are set out in section 11 of this policy.

2 Purpose

The purpose of this policy is:

- to set out City & Guilds' policy relating to whistleblowing;
- to provide information on how to identify situations that may represent wrongdoing (see section 5);
- to provide information on how to report allegations of wrongdoing (see section 6);
- to give reassurance to those reporting concerns of wrongdoing that they are protected from adverse consequences (see section 8); and
- in common with all City & Guilds policies, to provide clarity and consistency, to reflect good governance and best practice, and to enhance risk management and time/cost control.

2 Terms used in this policy and their meanings

City & Guilds	City & Guilds Limited and any of its subsidiaries from time to time;
City & Guilds Employee	a person who is employed by City & Guilds;
Policy Owner	Head of Legal;
Constitutional	relating to or covered by the constitution of City & Guilds;
Compliance	relating to or covered by any type of law (for example tax, education, charity, contract, company, employment, competition); and
Whistleblowing Process	means the Whistleblowing Process as updated from time to time.

3 Scope and related policies

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3.1 This policy applies to:

- all City & Guilds Employees at all levels and grades, including, the Chief Executive Officer, members of the Executive Leadership Team, and all employees (whether permanent or fixed-term) and temporary workers, wherever located; and
- contractors and suppliers of City & Guilds including associates.

4 Constitutional and compliance aspects

4.1 Constitutional

There are no constitutional provisions which are relevant to this policy.

4.2 Compliance

The Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998) provides protection for whistleblowers reporting malpractice.

5 What is whistleblowing?

Whistleblowing is the process whereby an individual can raise a concern about suspected wrongdoing or malpractice within City & Guilds.

A whistleblowing concern may include an action or risk of an action committed by an individual or team, which you feel constitutes one of the following:

- malpractice such as:
 - actions contrary to any City & Guilds policy;
 - actions contrary to any regulations set by a regulatory body to which City & Guilds is subject;
 - financial malpractice or maladministration; or
 - failure to follow financial, procurement and contract procedure rules;
- criminal offences or other unlawful activity such as fraud or corruption including accepting or paying bribes;
- environmental damage;
- health and safety risks; or
- concealment of information relating to any of the above.

This policy should not be used for:

- (for employees), employment-related complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should refer to the appropriate HR policy and raise a case via the Employee Service Centre; or

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- complaints relating to the allegations of malpractice or maladministration at a City & Guilds centre. In those cases, you should refer to the Investigations Team.

6 How do I raise a whistleblowing concern?

6.1 Who can I raise a concern to?

If you have a concern relating to any of the above, you should report it under this policy.

Internal disclosure

You are encouraged to report concerns internally in the first instance using one of the communication channels below, as appropriate in the circumstances:

- raise your issue or concern with your Line Manager (either verbally or in writing);
- if: (1) you believe that your Line Manager has not addressed your concern; or (2) you prefer not to raise it with them for any reason, you should email whistleblowing@cityandguilds.com, which is monitored and accessed by:
 - People Director
 - Head of Legal
 - Director of Commercial Operations
 - A Junior Lawyer authorised from time to time by the Head of Legal.

If you do not wish to email whistleblowing@cityandguilds.com, for example if the matter relates to a person who has access to this inbox, you may instead send an email to the City & Guilds email addresses of one of the following:

- People Director
- Head of Legal

External disclosure

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

Not only could external disclosure be contrary to your obligations of confidentiality to City & Guilds, but it could also prejudice any investigation that we and/or an external body decide to undertake.

Depending on which part of the business your concern relates to, you may report to the specific bodies set out in Schedule 1.

6.2 When should I raise a concern?

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Although concerns can be raised under this policy at any time, prompt notification is usually needed to ensure the concern can be investigated and appropriate action taken. Prompt notification also assists us to maintain high standards of compliance and to prevent destruction of evidence which might be required in an investigation (whether by us or an external organisation).

6.3 How should I raise a concern?

You may raise a concern anonymously, openly, or confidentially. The definitions of which are set out below. Any concerns reported under this policy, notwithstanding how they are raised, will be taken seriously, and investigated (as far as reasonably practicable) in accordance with the Whistleblowing Process.

Anonymously	means that we will not let anyone know who you are;
Openly	means that we can let people know who you are; and
Confidentially	means that we promise not to reveal your identity, to the extent possible in the circumstances.

We encourage you to voice your whistleblowing concerns openly under this policy.

If you raise an issue or concern anonymously or confidentially, we will make every effort to protect your identity and will not disclose it without your consent. However, it may not, in all circumstances, be possible to maintain confidentiality such as where:

- we are required to disclose your identity by law; or
- there is a serious risk to health and safety; or
- you raise an allegation of a safeguarding concern, money laundering or other criminal offence.

If we find that we cannot resolve the issue without the disclosure of your identity, we will discuss this with you.

6.4 What to include?

There is no requirement for you to provide any evidence at the stage of reporting the issue or concern under this policy. However, you may need to provide documents and emails that you have as part of the investigation.

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For general guidance the following is useful to include in your email:

- the organisation or individual's name
- details of the suspected wrongdoing
- names of individuals involved
- period for which it has been going on
- location of suspected wrongdoing
- impact of suspected wrongdoing
- any supporting documents or evidence.

Any of the details you share with us will be stored securely and we limit access to this information to the extent possible in the circumstances.

7 Investigation and outcome

Once you have raised an issue or concern, we will review and then, if so determined, investigate: details of the procedure are set out in the Whistleblowing Process.

8 Protection and support for whistle blowers

As long as you have a genuine and reasonable belief that wrongdoing is taking place, you can expect to be supported by City & Guilds in reporting issues and concerns. You will not be risking your job and should not be subject to harassment or victimisation.

EXAMPLES OF VICTIMISATION

There is no formal definition of victimisation but some examples are:

- **Personal retaliation:** bullying, harassment, or ostracisation that makes your life difficult in the workplace, or grievances or complaints made against you by colleagues in response to you raising a concern.
- **Misuse of disciplinary processes:** unjustified and/or unfair comments and reviews regarding your performance or conduct, investigations into fabricated concerns about your conduct or performance or directly disciplining you for raising concerns.
- **Imposed changes to your contract:** removal of key responsibilities, unrequested relocation or redeployment, imposed changes to your working pattern.
- **Preventing your career progress:** denial of a job, promotion, training opportunities or access to resources.
- **Failure to respect your confidentiality as a whistleblower:** any attempt to identify you where a concern has been raised anonymously or confidentially.

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For employees: If you feel that you are being victimised or harassed, we encourage you to refer to the appropriate HR policy and raise a case via the Employee Service Centre. We recognise that it can be difficult and upsetting to raise any instances of victimisation or harassment. The Employee Assistance Programme is available to all employees to access at any time: [Wisdom \(healthassured.org\)](https://www.healthassured.org).

For Associates: If you feel that you are being victimised or harassed, we encourage you to inform your Lead / Associate Manager.

Anyone who is suspected of victimising or harassing a whistle blower may face investigation and disciplinary action under the relevant City & Guilds disciplinary procedure.

Equally, deliberately false allegations are not acceptable and anyone making such allegations may face investigation and disciplinary action which could result in termination of either the employment or, contract for services.

9 Training

There is an awareness raising campaign which is determined by the Policy Owner on an annual basis. However, there is no mandatory whistleblowing training available unless there is a specific requirement, or it is requested. For the most up to date information regarding available training, please contact Legal.

10 Monitoring and review

10.1 This policy and any amendments to it are approved by the Policy Owner.

10.2 The Policy Owner is responsible for:

- promoting awareness of this policy
- reviewing this policy every 3 years (or more often if necessary) with advice from Legal (who are responsible for the drafting) and if necessary or desirable in consultation with relevant stakeholders. Suggestions to be taken into account in the next review are welcome and should be sent to Legal.

10.3 A record of concerns raised is kept by the Legal Department, who report annually and confidentially to the Audit and Risk Committee.

10.4 Each member of the Executive Leadership Team has been instructed to implement this policy to ensure that:

- it is communicated to all employees;
- each member of their directorate understands it is a disciplinary offence to prevent anyone from reporting a concern; and
- all reported allegations are promptly investigated with due confidentiality.

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11 Advice and support

11.1 You may seek independent advice and support from:

- Protect - an independent charity which has lawyers who provide confidential advice, free of charge, to people concerned about wrongdoing at work. Protect can be contacted using the contact details available on its website: <https://protect-advice.org.uk>

[Employee Assistance Programme](#) – a confidential support and advice service available to employees which can be contacted by telephone on 0800 282193. Please note, this service cannot be used to raise a concern under this policy (see section 6 for how to raise a concern).

11.2 Queries about this policy should be sent to Legal.

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SCHEDULE 1 – SPECIFIC BUSINESS AREA CONTACTS

If the concern relates to Intertrain UK Limited, you may instead report the concern via:

Network Rail	via the 'speak out' process available at https://safety.networkrail.co.uk/
The Confidential Incident Reporting and Analysis System for the rail industry (CIRAS)	Online: https://www.ciras.org.uk/Raise-a-concern Phone: 0800 4101 101 Freepost: CIRAS Text: 07507 285 887
Rail Sentinel	In accordance with the Sentinel Scheme Rules Online: https://info.railsentinel.co.uk/ Phone: 0330 7262 222 Email: sentinellinvestigations@networkrail.co.uk
The National Skills Academy for Rail (NSAR)	in accordance with the Rail Training and Assessment Scheme Rules (RTAS): Email: FormalReview@nsar.co.uk Recorded delivery: Chief Operating Officer National Skills Academy Rail 26th Floor, Millbank Tower 21-24 Millbank London SW1P 4QP

If your concern relates to City & Guilds (Awarding Organisation), you may instead report the concern via:

Ofqual	via its online reporting service available at: Ofqual Complaints and Whistleblowing
Qualification Wales	by completing a whistleblowing disclosure form available at Complaints Qualifications Wales and sending it to report@qualification.wales .
CCEA	by emailing whistleblowing@ccea.org.uk
Scottish Qualifications Authority	by emailing customer@sqa.org.uk
IfATE	by emailing enquiries.ifa@education.gov.uk with an email headed "Making a disclosure"

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