



Estu Global Ltd

Whistleblowing Policy

v3



Policy version control

Issue	Date	Approved By	Position	Revision Notes
V1	Feb 24	Bruce Storey	COO	New policy
V1.1	Oct 24	Bruce Storey	COO	Format update and legal check
V2	Oct 25	Bruce Storey	COO	• Contents page added • Introduction updated to clarify who the policy applies to • Updated the Protection sub-section within Safeguards • New section added – Examples of whistleblowing concerns relevant to Estu • Roles & responsibilities section added to clarify who concerns should be raised to • Add external reporting / prescribed persons wording • Revision to Whistleblowing Officer Responsibilities
V3	Jun 26	Bruce Storey	COO	Head of Quality updated to Yvonne
Next Review Date: Oct 25			Policy Owner: COO	

Whistleblowing policy

Contents

Policy version control	2
Whistleblowing policy	3
Introduction	4
Policy objectives	4
Roles & responsibilities	5
Safeguards	6
Handling of Allegations	6
Timeframe for Resolution	7
Investigation Processes	7
Implications for Estu Operations	9
Continuous Improvement	9

Introduction

Estu Global is committed to maintaining the highest standards of ethical conduct and promoting a culture of openness, transparency, and accountability. This Whistleblowing Policy is designed to provide a mechanism for individuals to report concerns about wrongdoing within the organisation without fear of reprisal.

This policy applies to Estu employees, workers, associates, advisers, Board members and others working on Estu's behalf. Learners, employers or other external stakeholders may also use this policy to raise serious concerns about wrongdoing connected to Estu's activities, although some matters may be more appropriately handled under Estu's complaints, safeguarding or quality procedures.

Whistleblowing refers to the act of reporting concerns about suspected wrongdoing, malpractice, unethical behaviour, or any other activity that may pose a risk to the well-being of learners, staff, or the organisation as a whole.

Where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management.

The Public Interest Disclosure Act, which came into effect in 1998 and updated in 2013 gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns.

This policy is not intended to replace Estu's grievance, complaints, safeguarding, disciplinary, harassment, malpractice, maladministration or appeals procedures. Personal employment concerns should usually be raised through the grievance procedure, unless the matter is also in the public interest or indicates serious wrongdoing.

Estu will provide training to employees and other stakeholders to raise awareness about the whistleblowing policy and the importance of reporting concerns. This will include guidance on how to make a whistleblowing report and the protection available to whistleblowers.

Policy objectives

The purpose of this policy is to achieve the following:

- To establish clear and accessible procedures for staff to report concerns or whistleblow on matters such as fraud, safeguarding breaches, unethical behaviour, health and safety risks, or legal violations.
- To ensure that individuals who raise legitimate concerns in good faith are protected from any form of retaliation, victimisation, or unfair treatment, in compliance with the Public Interest Disclosure Act 1998.

- To ensure that all whistleblowing concerns are taken seriously, investigated promptly, thoroughly, and impartially, with appropriate actions taken based on the findings.
- To reinforce the organisation's commitment to high ethical standards, legal compliance, and integrity, using whistleblowing as a mechanism to address and correct issues that may undermine these values.
- To ensure that the whistleblowing process complies with relevant UK laws and regulations, including Ofsted and ESFA guidelines, and is aligned with best practices in the sector.

Examples of whistleblowing concerns

Examples of concerns that may be raised under this policy include:

- Safeguarding or Prevent concerns that have not been appropriately addressed
- Fraud, financial irregularity or misuse of public funds
- Deliberate misreporting of learner participation, attendance, eligibility, achievement or funding information
- Malpractice, maladministration or assessment-related wrongdoing
- Serious breaches of data protection, confidentiality or information security
- Serious health and safety risks
- Bribery, corruption or conflicts of interest that have not been disclosed or managed
- Attempts to conceal any of the above.

Roles & responsibilities

Concerns should normally be raised with the Whistleblowing Officer or the COO. Where the concern relates to either of those individuals, or where the individual does not feel able to raise the matter with them, the concern may be raised with the CEO or Board Chair.

Whistleblowing Officer: Kevin Dowson, Head of Quality, kevin.dowson@estuglobal.com

COO: Bruce Storey, COO, bruce.storey@estuglobal.com

CEO: Simon Littlewood, CEO, simon.littlewood@estuglobal.com

- **Chief Operating Officer (COO):** As the Policy Owner, responsible for overseeing the whistleblowing process and ensuring that concerns raised are handled impartially, promptly, and in compliance with legal and regulatory requirements. The COO also serves as the final point of escalation for unresolved whistleblowing cases.
- **Whistleblowing Officer:** Plays a central role in receiving and assessing whistleblowing reports, leading investigations, and ensuring that all necessary steps are taken to

address concerns. The Whistleblowing Officer maintains communication with the whistleblower, oversees evidence gathering, and prepares investigation reports.

- **Line Managers:** Responsible for creating an open environment where staff feel comfortable raising concerns. They are also expected to refer any reported concerns to the Whistleblowing Officer or the COO and to ensure that staff are aware of whistleblowing procedures.
- **All Employees:** Individuals should raise concerns honestly and with a reasonable belief that the information disclosed tends to show wrongdoing. Concerns that are knowingly false, malicious or made for personal gain may be treated as a disciplinary or contractual matter.

Safeguards

Protection

A worker who makes a qualifying disclosure in the public interest may be protected by law from dismissal, detriment, victimisation or other unfair treatment because they have raised a whistleblowing concern. Estu will not tolerate retaliation against any individual who raises a genuine concern under this policy.

Confidentiality

Estu will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

Handling of Allegations

Step 1 - Acknowledgment

Upon receipt of a formal allegation, Estu will promptly acknowledge the allegation in writing, confirming that it has been received and providing an estimated timeframe for resolution.

Step 2 - Investigation

Estu will conduct a thorough and impartial investigation into the allegation. This may involve gathering additional information, interviewing relevant parties, and reviewing documentation. The investigation will be conducted by a designated individual or team, independent of those directly involved in the allegation.

Step 3 - Resolution

Estu is committed to resolving allegations in a fair and timely manner. The resolution may involve corrective actions, process improvements, or other measures as deemed appropriate. The individual who raised the allegation will be informed of the outcome of the investigation and any actions taken to address the allegation.

External reporting and independent advice

Estu encourages concerns to be raised internally where possible so they can be addressed promptly. However, individuals may also be able to raise concerns with an appropriate prescribed person or body, or seek independent advice, where this is permitted by law. Relevant bodies may include regulators or public authorities depending on the nature of the concern.

Independent advice may be sought from Protect, Acas, Citizens Advice, a trade union or a legal adviser.

Timeframe for Resolution

Estu aims to resolve complaints within 20 working days from the date of receipt. However, some complex allegations may require more time for a thorough investigation. In such cases, the individual who raised the allegation will be kept informed of the progress and provided with regular updates on the expected resolution timeframe.

Investigation Processes

Whistleblowing Officer Responsibilities

The Whistleblowing Officer plays a central role in the investigation process and is responsible for:

- Receiving and assessing whistleblowing reports.
- Determining the appropriate investigative steps based on the nature and complexity of the concerns raised.
- Maintaining communication with the whistleblower throughout the process, within the bounds of confidentiality.
- Overseeing the gathering of evidence and relevant documentation.
- Facilitating interviews with relevant parties, ensuring fairness and objectivity.
- Analysing the collected information to form conclusions about the validity of the concerns raised.
- Preparing a comprehensive report on the investigation findings.
- Recommending corrective actions or improvements if necessary.

Highlighted Investigation Stages

- **Preliminary Investigation:** Upon receiving a whistleblowing report, the Whistleblowing Officer will conduct a preliminary investigation to determine the nature and urgency of the concerns.
- **Evidence Gathering:** the Whistleblowing Officer will systematically gather evidence, including documents, emails, witness statements, and any other relevant information. The goal is to obtain a comprehensive understanding of the reported concerns.
- **Interviews:** Individuals with relevant knowledge or involvement in the reported concerns may be interviewed during the investigation process. Interviews will be conducted impartially and with a commitment to confidentiality.
- **Analysis and Conclusions:** The gathered evidence will be analysed to form conclusions about the validity of the concerns. The investigation will consider all perspectives and aim to provide an objective assessment of the reported issues.
- **Report Preparation:** The Whistleblowing Officer will oversee the preparation of a report detailing the investigation findings. The report will include a summary of the concerns, the investigative process, conclusions reached, and any recommended actions.

Reporting Outcomes to the Whistleblower

Once the investigation is complete, the Whistleblowing Officer will communicate with the whistleblower, where appropriate and within the bounds of confidentiality. This may include:

- confirmation that the matter has been investigated and concluded
- a summary of the findings, where it is appropriate to share this
- information on any corrective actions or improvements, where these can be disclosed

The individual who raised the concern will be informed, where appropriate, whether the matter has been investigated and concluded. Estu may not be able to share full details of findings or actions where this would breach confidentiality, data protection obligations or the rights of others.

The Whistleblowing Officer will maintain sensitivity to the confidentiality of the whistleblower and share information within the bounds allowed by law.

Escalation if the whistleblower remains concerned

If the individual reasonably believes that their concern has not been properly considered, they may escalate the matter to the COO, CEO or Board Chair, depending on who has already been involved. The escalation will be reviewed by someone not previously responsible for the decision wherever practicable. This will normally be completed within ten working days, although more complex cases may take longer.

Implications for Estu Operations

- Ensure there is clarity on Estu's whistleblowing procedures – who to report a complaint to and how this should be done.
- Ensure knowledge of the expectation of communication whilst complaint is being resolved.
- Ensure knowledge of the whistleblowing process.
- Ensure everyone associated with Estu is aware of the investigation steps.
- Leadership and management promote a culture of openness.

Continuous Improvement

The Whistleblowing policy will be reviewed as a minimum annually or when there is a change to legislation or guidance.

Related policies and documents

This policy is to be read in conjunction with other policies and procedures, including those listed below.

Policy Name	Policy Number
Conflict of interest policy	101
Maladministration and malpractice policy	203
Quality assurance policy	204

Reviewed and signed on behalf of the Board: Bruce Storey

By: Bruce Storey, COO

Signing date: 30/06/2026

Date of next review: 30/06/2027