

Title	Whistleblowing Policy
Cross References	External: - Public Interest Disclosure Act 1998 - Employment Rights Act 1996 - Keeping Children Safe in Education 2026 Internal: - Employee Handbook – Grievance / Disciplinary - Apricot Online Ltd Statement of Main Terms - Child Protection and Safeguarding Policy - Staff Code of Conduct - Grievance Procedure - Disciplinary Procedure
Date	October 2026

1. Purpose

Apricot Online Ltd is committed to high standards of integrity, safeguarding and accountability. Staff and other workers should feel able to raise genuine concerns about wrongdoing, unsafe practice or failures within the organisation without fear of retaliation.

This policy explains how concerns that may be protected under whistleblowing law can be raised and how Apricot will respond. It is intended to support a culture in which concerns are raised early and dealt with appropriately.

2. What is Whistleblowing?

Whistleblowing is the disclosure of information by a worker about wrongdoing or danger at work which they reasonably believe is in the public interest. It is different from a personal grievance about an individual's own employment, which would normally be dealt with through the relevant grievance or employment procedure.

A qualifying disclosure may concern:

- a criminal offence that has been, is being or is likely to be committed;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment; or
- deliberate concealment of information relating to any of the above.

The concern may relate to conduct that has happened in the past, is happening now or is likely to happen.

3. Safeguarding and Whistleblowing

Whistleblowing has particular importance in an organisation working with children and vulnerable learners. Staff should raise concerns where they believe safeguarding practice is unsafe, concerns are being ignored, procedures are not being followed, or the conduct of a colleague or the organisation may place a child or young person at risk.

Whistleblowing does not replace Apricot's Child Protection and Safeguarding Policy. If a member of staff believes a child is at immediate or ongoing risk of harm, the safeguarding concern must be reported without delay through the safeguarding procedure. Where the concern is about the way Apricot or a member of staff has handled safeguarding, the whistleblowing route may also be appropriate.

4. Raising a Concern Internally

Apricot encourages concerns to be raised internally where it is appropriate and safe to do so. A worker does not need to prove wrongdoing before raising a concern. They should provide the information they have and explain the basis for their concern honestly and as clearly as possible.

In the first instance, a concern should normally be raised with the worker's Line Manager. If the concern involves the Line Manager, the worker is uncomfortable raising it with them, or the matter is particularly serious, it may be raised directly with the Operations Director.

Where the Operations Director is implicated in the concern, or there is another reason why that route would not be appropriate, the concern should be raised directly with a Director of Apricot Online Ltd.

Concerns may be raised verbally or in writing. Written concerns should set out the nature of the issue, relevant dates or events, people involved where known and any supporting information available.

5. Confidentiality and Anonymous Concerns

Apricot will treat whistleblowing concerns sensitively and will seek to protect the identity of the person raising the concern so far as reasonably possible. There may be circumstances in which information must be shared in order to investigate the matter, meet safeguarding duties or comply with the law. Where possible, this will be discussed with the person who raised the concern.

Anonymous concerns will be considered, but anonymity may make it more difficult to investigate fully, clarify information or provide feedback. Staff are therefore encouraged to identify themselves where they feel able to do so.

6. How Apricot Will Respond

Concerns will be considered promptly and proportionately. The action required will depend on the nature and seriousness of the information and may include:

- initial fact-finding or management review;
- a safeguarding response or referral;
- an internal investigation;
- action under disciplinary or other employment procedures;
- referral to an external regulator, local authority, police or other appropriate body;
- changes to policy, procedure, training or practice; or
- no further action where the concern is not substantiated or does not fall within this policy.

The person who raised the concern will be told, where appropriate and lawful, that the matter has been considered and may be given general information about the outcome. Apricot may be unable to provide details where this would breach confidentiality, data-protection requirements or the rights of another person.

7. Protection from Detriment

Apricot will not tolerate bullying, harassment, victimisation, dismissal or other detrimental treatment because a worker has raised a qualifying disclosure in accordance with the law.

Anyone who subjects a colleague to retaliation or detrimental treatment because they have raised a genuine whistleblowing concern may be subject to disciplinary action.

A worker will not be penalised simply because a concern raised honestly and on reasonable grounds is not ultimately substantiated.

8. Knowingly False or Malicious Allegations

Apricot distinguishes between a concern raised honestly that proves to be mistaken and an allegation that a person knows to be false or raises maliciously.

No action will be taken against a worker merely because a genuine concern is not substantiated. However, where there is evidence that an allegation was knowingly false or malicious, the matter may be considered under Apricot's disciplinary procedure.

9. External Advice and Disclosures

There may be circumstances in which a worker considers raising a concern outside Apricot. The legal protection available for an external disclosure depends on the circumstances and the body to which the disclosure is made.

Workers may obtain independent advice before making an external disclosure. Safeguarding professionals working with children can also seek advice from the NSPCC Whistleblowing Advice Line where they are concerned about how child-protection issues are being handled within their organisation.

A worker may also make a protected disclosure to an appropriate prescribed person or regulatory body where the legal requirements for doing so are met.

10. Relationship with Other Procedures

This policy should not normally be used to pursue a personal complaint relating solely to an individual's own employment. Such concerns will usually be considered under the grievance or other relevant employment procedure.

Where a concern contains both personal employment issues and wider public-interest wrongdoing, Apricot will consider the appropriate route for each aspect rather than requiring the worker to choose a single procedure.

11. Record Keeping

Apricot will maintain appropriate confidential records of whistleblowing concerns, decisions and action taken. Records will be accessed only by those who need the information for a legitimate purpose and retained in accordance with Apricot's data-protection and record-retention arrangements.

12. Review

This policy will be reviewed annually and sooner where changes to legislation, statutory guidance, safeguarding requirements or Apricot's organisational arrangements make this necessary.

Authorised by: Jodie Phillips, Operations Director

Date: October 2026

Review Date: October 2027