

01.08 TLEQ Whistleblowing Policy

1. Purpose

The Leisure Experts Qualifications (TLEQ) is committed to the highest standards of integrity, transparency and learner protection, and to creating an environment where staff, education hubs and learners feel safe to speak up about concerns.

This policy sets out how individuals can raise concerns (often referred to as whistleblowing or protected disclosures) about wrongdoing, risk or misconduct connected to TLEQ regulated activities, including the development, delivery and award of TLEQ qualifications.

The aims of this policy are to:

- Provide a clear and safe route for raising serious concerns
- Ensure concerns are taken seriously, investigated appropriately and acted upon
- Protect individuals who raise concerns in good faith from victimisation or detriment
- Support compliance with applicable legislation (e.g. UK Public Interest Disclosure Act and ROI Protected Disclosures Act) and the general conditions of recognition of the relevant regulatory body and awarding organisation (CCEA / iTEC / VTCT), including expectations around governance, malpractice and learner protection.

2. Scope

This policy applies to concerns about wrongdoing in the public interest relating to TLEQ regulated activities, including but not limited to:

- Development, delivery or award of TLEQ qualifications (including assessment and certification)
- Actions of TLEQ staff, contractors, subject-matter experts, quality assurance personnel, and education hubs
- Breaches of regulatory requirements, internal policies, or relevant law

Those who may raise concerns under this policy include (but are not limited to):

- TLEQ employees and contractors



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- Education hub staff (tutors, assessors, internal verifiers, administrators)
- Learners
- External quality assurers, consultants or partners

This policy is not intended for:

- Personal grievances or employment disputes (which should use TLEQ HR or grievance processes)
- Routine appeals about assessment decisions, which should use **TLEQ Appeals Policy (01.14)**

Where a concern overlaps (e.g. both a complaint and a potential malpractice issue), TLEQ will decide the most appropriate route and inform the individual.

3. Definitions

Whistleblowing / Protected Disclosure – the disclosure of information by an individual who reasonably believes that there is wrongdoing, risk or malpractice in relation to TLEQ activities, and that it is in the public interest that this is raised.

Wrongdoing / Malpractice may include the following:

- Fraud, theft or financial irregularity
- Malpractice or maladministration in assessment, verification or certification
- Deliberate breach of qualification or assessment requirements
- Failure to comply with legal or regulatory obligations (CCEA / ITEC / VTCT)
- A serious breach of safeguarding, health and safety or learner protection
- Knowingly allowing unqualified staff to deliver or assess regulated qualifications
- Concealment or cover-up of any of the above

4. Policy Principles

TLEQ whistleblowing arrangements are built on the following principles:

4.1 We Take Concerns Seriously

All disclosures under this policy will be taken seriously and considered promptly and fairly.



4.2 Protection from Detriment

Individuals who raise concerns in good faith will not be subjected to dismissal, victimisation or any other form of detrimental treatment as a result of raising a concern.

4.3 Confidentiality

TLEQ will take all reasonable steps to protect the identity of whistleblowers and keep information confidential, consistent with proper investigation and legal obligations. However, in some cases the nature of the concern may make it possible for others to infer a whistleblower's identity.

4.4 Impartial Investigation

Concerns will be investigated by individuals who are suitably independent and have no conflict of interest. Where necessary, the matter may be escalated to the Responsible Officer or Board of Directors.

4.5 No Requirement to Prove

Whistleblowers are not required to prove that wrongdoing has occurred; however, they should have a reasonable belief that the information disclosed is true.

4.6 Good Faith and Responsible Use

Concerns must be raised honestly and not maliciously or vexatiously. Knowingly false allegations may be treated as misconduct.

4.7 Right to Escalate Externally

This policy does not remove the right of individuals to raise concerns directly with the relevant regulatory body and awarding organisation (CCEA / iTEC / VTCT) or other prescribed authorities, in line with relevant whistleblowing and protected disclosure laws.

5. How to Raise a Concern Internally

Wherever possible, TLEQ encourages concerns to be raised internally in the first instance. Where the concern relates primarily to an education hub or specific team, the individual



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may raise it with their line manager or the education hub lead / course leader. If this is not appropriate (e.g. the concern involves them or a fear of reprisal), the individual may go directly to TLEQ.

Concerns can be raised directly with TLEQ via any of the following routes:

- **Email** – whistleblowing@tlequalifications.com
- **Online Submission** – a confidential disclosure can be made via the following link: [CLICK HERE](#)
- **Post** – TLEQ Qualifications, 6 Margaret Street, Newry, BT34 1DF, Northern Ireland

To help TLEQ assess and investigate, whistleblowers should include:

- What has happened (a clear description of the concern)
- When and where it occurred
- Who was involved (names, roles, organisations if known)
- Any evidence already available (documents, emails, screenshots)
- Whether the concern has been raised elsewhere and any response received

Anonymous concerns will be considered, but may be more difficult to investigate, and TLEQ may be unable to provide feedback or clarification. Whistleblowers are encouraged, where possible, to provide a contact method, even if pseudonymous.

6. How TLEQ Will Handle a Disclosure

TLEQ will acknowledge receipt of a whistleblowing disclosure within seven days, where contact details are provided. For online submissions, acknowledgement will normally be sent by email (where supplied). The Governance Lead (or alternative designated senior post-holder) will undertake an initial assessment to determine whether the concern falls within the scope of this policy, if there is any immediate risk to learners,

staff or the integrity of TLEQ qualifications, or whether urgent protective action is required (e.g. pausing assessments, safeguarding action).



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Depending on the nature and seriousness of the concern, TLEQ may:

- Commission an internal investigation by a suitably independent manager or panel
- Involve the Quality Assurance Lead, Safeguarding Lead or other specialists
- Request further information from the whistleblower (where possible)
- Inform or coordinate with external bodies e.g. education hub management, statutory agencies, regulatory body and awarding organisation (CCEA / ITEC / VTCT) where appropriate

Investigations will be proportionate to the issues raised, conducted as promptly as is reasonably practicable, and documented with evidence and conclusions recorded. Once an investigation has been concluded, TLEQ will:

- Decide what action, if any, is appropriate e.g. corrective actions, sanctions, referral to another body
- Provide feedback to the whistleblower where feasible, within the limits of confidentiality and data protection
- Explain if certain details cannot be shared e.g. for privacy, employment or legal reasons

Where an investigation identifies actual or potential non-compliance with regulatory requirements, TLEQ will cooperate fully with the relevant regulatory body and awarding organisation (CCEA / ITEC / VTCT), including sharing information and evidence as appropriate and implementing any

agreed remedial actions. The whistleblower does not have the right to direct how TLEQ responds but will be informed whether the concern has been upheld in principle and whether action is being taken.

7. Confidentiality and Data Protection

TLEQ will treat whistleblowing disclosures as confidential, sharing information only with those who need it to assess and investigate the concern. The organisation will also seek



to avoid revealing the whistleblower's identity without their consent, unless legally required or where there is a serious safeguarding or risk issue. TLEQ will process personal data in accordance with GDPR and data protection regulations.

Whistleblowers should be aware that others involved may infer their identity from the circumstances, and in rare cases (e.g. court proceedings), it may not be possible to maintain anonymity.

8. Protection from Victimisation

Victimisation or detrimental treatment of anyone who raises a concern in good faith under this policy is not tolerated, even if the concern is not ultimately substantiated. Examples of victimisation include unfair dismissal, demotion, denial of opportunities, bullying, harassment, threats or intimidation.

Any TLEQ employee, contractor or education hub found to have victimised a whistleblower may be subject to disciplinary action, up to and including termination of contract or withdrawal of education hub approval.

Individuals who believe they have suffered detriment because of whistleblowing should inform the Governance Lead or Responsible Officer.

9. Malicious or Vexatious Allegations

If it is established that a disclosure was made maliciously, knowingly false or with intent to cause harm rather than to raise a genuine concern, TLEQ may treat this as a disciplinary matter (for staff) or as misconduct under education hub or learner agreements. This does not apply to concerns raised in good faith which turn out to be mistaken.

10. Education Hubs (Approved Training Centres)

Education hubs must maintain clear internal procedures that allow staff and learners to raise concerns safely and confidentially. Education hubs must also signpost individuals



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to the **TLEQ Whistleblowing Policy (01.08)** and the associated reporting routes, including the TLEQ email address and online submission link, for concerns relating to TLEQ qualifications or where the individual feels unable to raise the concern locally.

Education hubs must ensure that their procedures do not prevent, restrict or discourage anyone from raising a concern directly with TLEQ or with the relevant regulatory body and awarding organisation (CCEA / iTEC / VTCT).

11. Escalation to Regulatory Bodies and External Prescribed Persons

This policy does not remove the right of individuals to make a protected disclosure directly to the relevant regulatory body and awarding organisation (CCEA / iTEC / VTCT) or to other prescribed persons, in line with national legislation (e.g. Public Interest Disclosure Act in the UK, Protected Disclosures Act in Republic of Ireland).

Examples may include concerns about TLEQ integrity of regulated TLEQ qualifications delivered in the United Kingdom, Northern Ireland and Republic of Ireland, or concerns relating to the development, delivery or awarding of TLEQ qualifications.

TLEQ encourages concerns to be raised internally first wherever possible, so that issues can be resolved quickly and effectively. However, if the whistleblower reasonably believes that internal reporting would not be effective or might lead to evidence being concealed, or the concern involves serious or systemic regulatory breach, it may be appropriate to contact the relevant regulatory body and awarding organisation (CCEA / iTEC / VTCT) directly.

12. Record-Keeping and Reporting

TLEQ will maintain secure records of:

- Whistleblowing disclosures received (including those made via online submission)
- Investigations undertaken
- Outcomes and actions taken



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These records will be stored securely and access-controlled, in line with GDPR and data protection regulations.

The Governance Lead will provide an annual report (with identities anonymised) to the Board of Directors, highlighting the volume and type of disclosures, key themes and risks, and actions taken with learning for TLEQ governance, quality assurance and education hub management.

Whistleblowing insights are considered alongside complaints, malpractice, safeguarding and audit findings, ensuring that speaking up directly informs our understanding of risk, our education hub support model and our commitment to continually strengthening the integrity of TLEQ qualifications.

13. Training and Awareness

TLEQ will ensure that:

- Staff, contractors and key education hub personnel are made aware of this policy and how to raise a concern
- Induction and refresher training for relevant roles (including governance, QA and safeguarding post-holders) includes reference to whistleblowing, protected disclosures and expected standards of conduct
- Information about whistleblowing routes, including the secure e-form, is made accessible via TLEQ documents, e.g. **TLEQ Education Hub Handbook (01.11)** and staff induction materials, and appropriate online platforms

14. Monitoring and Review

This policy will be reviewed at least annually, or sooner if required by changes in legislation, regulatory expectations or TLEQ structure. Findings from whistleblowing cases and annual summaries will be considered as part of TLEQ Quality Assurance and Governance Framework and may contribute to updates to policies and procedures and education hub quality improvement actions.



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15. Record of Approval and Review

At TLEQ, regulatory assurance is more than compliance, it is our commitment to quality, fairness, and the lifelong trust placed in our qualifications.

Version	Date Approved	Approved By	Next Review Due	Owner
26.09.02	9 February 2026	TLEQ Board of Directors	1 February 2027	Governance Lead

16. Sign-Off

Approved by:

TLEQ Board of Directors Chair: Joni Harding (9 February 2026)

Responsible Officer: Paul Cain (9 February 2026)

Governance Lead: Rory Ryan (9 February 2026)

