

ESF13 Whistleblowing Policy		Effective date: 01/2023
Authorised Owner: Mark Turner		Last revision: 02/2026
Classification: Public	Issue: 02	Next review: 02/2027



# Whistle-Blowing Policy

## 1. Introduction

ESF apprenticeships' (trading name for Sporting Future Training (UK) Ltd) Whistle-Blowing Policy is an essential element of ESF apprenticeships' commitment to its core value of Integrity, ensuring we act fairly, honestly, and consistently. Consistent with our mission to promote wellbeing and inclusivity, this policy provides a clear framework for all staff, volunteers, and contractors to confidentially raise any genuine concerns about potential malpractice, criminal activity, or dangers in the workplace. We are committed to taking all disclosures seriously, investigating them thoroughly, and ensuring that those who raise concerns reasonably and responsibly will be protected from victimisation.

## 2. Scope

This policy is for people employed, or volunteering or working in partnership with the ESF apprenticeships. For the purposes of this policy only, this includes someone who is:

- employed on a permanent or fixed term contract of employment;
- on secondment to ESF apprenticeships
- on a temporary contract or employed through an agency to work for ESF apprenticeships
- an independent consultant for ESF apprenticeships
- a volunteer with ESF apprenticeships
- contractors and suppliers of services to ESF apprenticeships

## 3. Our commitment

It is the duty of every member of staff and volunteer to speak up about genuine concerns in relation to criminal activity, breach of a legal obligation (including

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negligence, breach of contract, breach of administrative law), miscarriage of justice, danger to health and safety or the environment, and the cover up of any of these in the workplace. It applies whether or not the information is confidential.

ESF apprenticeships is committed to ensuring that any staff concerns of this nature will be taken seriously and investigated. A disclosure to ESF apprenticeships will be protected if the member of staff has an honest and reasonable suspicion that the malpractice has occurred, is occurring, or is likely to occur. Staff and volunteers who raise concerns reasonably and responsibly will not be penalised in any way.

## 4. Guiding principles

To ensure that this policy is adhered to, and to assure staff that the concern will be taken seriously, ESF apprenticeships will:

- not allow the person raising the concern to be victimised for doing so;
- treat victimisation of whistle blowers as a serious matter that may lead to disciplinary action that may include dismissal;
- not attempt to conceal evidence of poor or unacceptable practice;
- take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct;
- ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise whistle blowing;
- liaise with the other organisations (see section below) to whom staff report malpractice.

In accordance with the Employment Rights Act 2025, no confidentiality clause or Non-Disclosure Agreement (NDA) can prevent any individual from making a protected disclosure under this policy. You always have the right to report wrongdoing, particularly concerning sexual harassment or discrimination.

## 5. Procedure

5.1 Any individual who has reasonable suspicions of malpractice should initially take their concerns to their line manager. If they do not feel that this is the appropriate

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person, they should approach the Director of Apprenticeships, or if their concern is related to that Director, they should contact Dr Mark Turner or Dr Siobhan Mellor (as Directors of ESF Apprenticeships and Sporting Futures Training (UK) Ltd and Real Group Ltd).

- 5.2 It is recognised that for some individuals, raising a concern under this procedure may be a daunting and difficult experience. An individual may choose to be accompanied or represented by a colleague at any stage of this procedure.
- 5.3 All reported incidents will be investigated. All reports will be dealt with in confidence, with only staff who need to know, being informed. The Director of Apprenticeships, with the agreement of Dr Mark Turner or Dr Siobhan Mellor, will take on the responsibility of investigating and will establish and record the basis of the concerns that have been raised and establish what further actions are required. The individual raising the concern will be advised of the outcome of the investigation as soon as possible, normally within two weeks of the date of their disclosure. Where a longer period is needed for investigation, the member of staff will be informed in writing. Dr Mark Turner or Dr Siobhan Mellor will be informed of all reported disclosures and the actions being taken.
- 5.4 In the case of disclosures on alleged fraud and corruption, the most senior member of the Finance team, if not involved, will be informed and will advise the investigating Director.
- 5.5 If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to Dr Mark Turner or Dr Siobhan Mellor, who will arrange any further investigation as they think appropriate. They will then send a written response to the individual concerned.
- 5.6 The ESF Apprenticeships Complaints policy is available for any individual who is concerned about the process that has been followed following a whistle blowing allegation.

## 6. Further advice

For further advice:

- Free information and advice can also be obtained from the Advice, Conciliation and Arbitration Service (ACAS)

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<https://www.acas.org.uk/whistleblowing-at-work> [accessed 21.2.26] or

Telephone: 08457 47 47 47, or

- Public Concern at work <https://protect-advice.org.uk/> [accessed 21.2.26]

You may feel that it is more appropriate to report a matter to another organisation. Other organisations concerned with standards include:

- Health & Safety Executive – contact on-line; <http://www.hse.gov.uk/contact/index.htm> [accessed 21.2.26] or in emergency 0845 300 9923
- Public Concern at Work and ACAS can advise on the circumstances when it is more appropriate to contact an outside body.

## 7. Relevant legislation

This policy is guided by current UK legislation, including:

- The Public Interest Disclosure Act 1998 (PIDA)
- The Bribery Act 2010
- The Worker Protection (Amendment of Equality Act 2010) Act 2023
- The Employment Rights Act 2025

## 8. Further information

ESF apprenticeships reserves the right to review, revise, amend or replace the content of this policy, and introduce new policies and procedures from time to time to reflect the changing needs of the organisation and new legislation and regulations.

## 9. Related documents

Mission statement

Complaints Policy

Fraud Policy

Malpractice & Maladministration Policy

Anti-bribery and Anti-Corruption Policy

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## 10. Document history

Issue 1 - Initial release Jan 2023, reviewed April 2025

Issue 2 - Feb 2026