



THE LINK TRAINING ACADEMY

WHISTLEBLOWING, FRAUD PREVENTION AND ANTI-BRIBERY POLICY

Document Control

Item	Detail
Policy Title	Whistleblowing, Fraud Prevention and Anti-Bribery Policy
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Applies To	All employees, associates, volunteers, contractors, agency workers, directors and stakeholders

Version Control

Version	Date	Author	Summary of Changes
WB_V1_25-26	August 2025	Amanda Lodge-Stewart	Annual review
WB_V2_26-27	August 2026	Amanda Lodge-Stewart	Full review to align with safeguarding framework, staff handbook, safer recruitment policy, low-level concerns, managing allegations, fraud prevention and anti-bribery requirements.

Purpose Statement

The Link Training Academy is committed to maintaining the highest standards of integrity, accountability, safeguarding and ethical conduct.

The organisation promotes a culture where concerns can be raised openly and safely without fear of victimisation, retaliation or detriment.

This policy forms part of the organisation's wider safeguarding framework and should be read alongside:

- Staff Handbook
 - Safeguarding and Child Protection Policy and Procedures
 - Low-Level Concerns Procedure
 - Managing Allegations Against Staff Procedure
 - Safer Recruitment Policy
 - Staff Handbook and Professional Standards Manual
 - Equality, Diversity and Inclusion Policy
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1. Purpose

This policy sets out how concerns regarding wrongdoing, fraud, safeguarding, misconduct, corruption, unsafe practice or illegal activity should be raised and managed.

The policy aims to:

- Promote openness and accountability.
 - Protect learners and staff.
 - Support safeguarding.
 - Prevent fraud and bribery.
 - Ensure legal compliance.
 - Protect those who raise concerns in good faith.
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2. Scope

This policy applies to:

- Employees
- Directors
- Contractors
- Volunteers
- Associates
- Agency Staff
- Consultants
- Visiting Speakers

The principles may also be used by learners, employers and stakeholders where concerns relate to organisational activity.

3. Speaking Up and Whistleblowing

3.1 Commitment

The Link Training Academy is committed to creating a culture of openness, accountability, integrity and safeguarding.

All staff are encouraged to raise concerns where wrongdoing, misconduct, risks to learners or unsafe practice may exist.

Individuals raising concerns in good faith will be treated fairly and supported throughout the process.

3.2 What is Whistleblowing?

Whistleblowing occurs where an individual raises a concern in the public interest regarding actual or suspected wrongdoing.

A concern may relate to something that:

- Has happened.
 - Is currently happening.
 - Is likely to happen.
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3.3 Concerns That Should Be Reported

Examples include:

- Safeguarding concerns.
- Criminal offences.
- Fraud.
- Theft.
- Bribery.
- Financial misconduct.
- Corruption.
- Health and safety breaches.
- Environmental damage.
- Abuse of power.
- Breach of legal obligations.

- Modern slavery or human trafficking concerns
 - Deliberate concealment of wrongdoing.
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3.4 Safeguarding Concerns

The organisation recognises that safeguarding concerns may require immediate action.

Examples include:

- Abuse of a child.
- Abuse of a vulnerable adult.
- Neglect.
- Exploitation.
- Radicalisation.
- Unsafe professional practice.
- Breaches of professional boundaries.

Safeguarding concerns must be reported immediately and must never wait for routine meetings or supervision arrangements.

Learner welfare will always take priority.

3.5 Low-Level Concerns

Concerns regarding conduct which falls below expected professional standards but does not meet the threshold for a formal allegation should be managed through the Low-Level Concerns Procedure.

Examples include:

- Professional boundary concerns.
- Inappropriate communication.
- Favouritism.
- Behaviour inconsistent with organisational expectations.

The organisation encourages openness and self-reporting.

3.6 Allegations Against Staff

Where concerns indicate that an individual may:

- Have harmed a learner.

- Possibly harmed a learner.
- Committed a safeguarding-related offence.
- Behaved in a way indicating unsuitability to work with learners,

the concern must be reported immediately and managed in accordance with the Managing Allegations Against Staff Procedure.

3.7 Reporting Routes

Concerns should normally be raised with:

Stage 1

Line Manager

Stage 2

Designated Safeguarding Lead (DSL)

Stage 3

Managing Director

Stage 4

Chair of Directors

Where concerns involve safeguarding matters they should be reported to the DSL immediately.

3.8 Anonymous and Confidential Reporting

Concerns may be raised anonymously.

However, anonymous reporting may limit the organisation's ability to investigate fully.

Confidentiality will be maintained wherever possible and on a need-to-know basis.

3.9 Protection from Detriment

No individual will suffer dismissal, victimisation, discrimination, harassment or detriment for raising a genuine concern in good faith.

- Dismissal.
- Harassment.
- Victimisation.
- Discrimination.
- Any detriment

for raising a genuine concern in good faith.

Any retaliation may result in disciplinary action.

3.10 Investigation Process

The organisation will:

- Acknowledge concerns.
- Assess risk.
- Investigate proportionately.
- Maintain confidentiality.
- Take appropriate action.

Individuals may be required to provide supporting information where appropriate.

3.11 External Reporting

Concerns may be raised externally where appropriate.

Relevant bodies may include:

- Ofsted
 - Disclosure and Barring Service
 - Police
 - Health and Safety Executive
 - Local Authority
 - Department for Education (DfE)
 - Department for Work and Pensions (DWP) where apprenticeship funding matters apply
 - Information Commissioner's Office
 - Care Quality Commission
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4. Professional Duty to Report

All employees, associates, volunteers, contractors and agency workers have a professional responsibility to:

- Report safeguarding concerns.
- Report fraud or suspected fraud.
- Report unsafe practice.
- Report serious misconduct.
- Report concerns regarding learner welfare.

Failure to report known safeguarding concerns or serious misconduct may itself be treated as a disciplinary matter.

5. Fraud Prevention

5.1 Commitment

The organisation operates a zero-tolerance approach to:

- Fraud.
 - Theft.
 - Financial irregularity.
 - Corruption.
 - Funding fraud.
 - Misuse of resources.
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5.2 Examples of Fraud

Examples include:

- False funding claims.
- Falsified learner records.
- Falsified timesheets.
- Expense fraud.
- Procurement fraud.
- Payroll fraud.
- Theft of property.
- False qualification claims.
- Misuse of organisational assets.
- Deliberately providing false information.

This list is illustrative, not exhaustive.

5.3 Prevention Measures

The organisation will:

- Maintain effective internal controls.
 - Conduct audits.
 - Implement financial oversight.
 - Carry out safer recruitment checks.
 - Provide training.
 - Monitor compliance.
 - Investigate concerns promptly.
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6. Anti-Bribery

The organisation is committed to complying with the Bribery Act 2010.

Bribery includes offering, promising, giving, requesting or accepting an advantage intended to influence decision-making improperly.

Employees must never:

- Offer bribes.
 - Request bribes.
 - Accept bribes.
 - Use organisational resources improperly.
 - Seek personal gain through their position.
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7. Gifts and Hospitality

Reasonable and proportionate hospitality may be accepted where:

- It is transparent.
- It does not influence decision-making.
- It creates no conflict of interest.
- It complies with organisational procedures.

Employees must not accept:

- Cash gifts.
- Personal payments.
- Excessive hospitality.

Gifts and hospitality above organisational limits must be declared.

8. Conflict of Interest

Employees must avoid situations where personal interests conflict with organisational responsibilities.

Potential conflicts must be declared immediately.

Examples include:

- Family relationships.
- Recruitment decisions.
- Financial interests.
- Supplier relationships.
- Contract awards.

Declarations will be reviewed and recorded appropriately.

9. Responsibilities

Board of Governors

The Board of Governors will:

- Receive assurance regarding whistleblowing, safeguarding and governance arrangements
- Monitor organisational culture and ethical practice.
- Provide independent scrutiny of challenge where appropriate

Directors

Directors are responsible for:

- Maintaining effective governance.
- Monitoring compliance.
- Reviewing investigations.
- Supporting ethical culture.

Managers

Managers are responsible for:

- Promoting awareness.
- Responding to concerns.
- Escalating matters appropriately.
- Supporting investigations.

Staff

All staff are responsible for:

- Acting honestly and ethically.
 - Reporting concerns.
 - Protecting organisational assets.
 - Following policies and procedures.
 - Supporting safeguarding.
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10. Monitoring and Review

The organisation will:

- Review this policy annually.
- Monitor incidents and trends.
- Review whistleblowing reports.
- Conduct audits.
- Review fraud controls.
- Monitor safeguarding compliance.

Lessons learned will inform policy and procedural improvements.

Appendix A - Reporting Flowchart

Plain Text

1

Concern Identified

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3

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Immediate Risk?

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YES —► Contact DSL / Emergency Services

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NO

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10



11

Report Concern

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13



14

Line Manager / DSL / Director

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16



17

Investigation / Review

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19



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Outcome & Actions

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Learning & Monitoring

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