

TRAINING CAVE



Policy Title	Whistleblowing Policy
Effective Date	26.01.2026
Current Issue/Review Date	25.09.2026
Next Review Date	25.09.2027
Approved By	Jack Sunderland Director Training Cave Club Ltd

1. Purpose

Training Cave Club Ltd is committed to an open culture in which wrongdoing, unsafe practice and safeguarding failures can be raised and addressed. This policy explains how a person can report a concern in the public interest, how Training Cave will respond, and the protection available against retaliation.

Whistleblowing is different from raising a personal complaint. A concern about wrongdoing that affects other people or the public may be whistleblowing. A concern about an individual's own employment situation will normally be managed under the grievance procedure, unless it also has a genuine public-interest element.

2. Organisational Status and Scope

Training Cave is an independent alternative provision and boxing provider. It is not a maintained school, academy, independent school or pupil referral unit. Keeping Children Safe in Education is used as relevant safeguarding good practice and commissioner assurance rather than presented as a statutory duty that automatically applies to Training Cave.

This policy may be used by employees, workers, coaches, tutors, mentors, agency staff, contractors, volunteers and placement students. The statutory protection available under whistleblowing law depends on the person's employment status, the nature of the disclosure and how it is made. Training Cave will nevertheless take genuine concerns from any of these groups seriously.

This policy does not replace immediate safeguarding, emergency, grievance, complaints, disciplinary, low-level concern or allegation procedures. Management will decide the correct route after an initial assessment and will explain that decision where possible.

3. Legal and Guidance Framework

This policy has regard to:

- Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation;
- Equality Act 2010;
- UK GDPR and Data Protection Act 2018;
- Children Act 1989 and Children Act 2004 safeguarding principles;
- current government whistleblowing guidance and the prescribed persons framework; and
- Keeping Children Safe in Education 2026 and Working Together to Safeguard Children, used proportionately where relevant.

4. What May Qualify as Whistleblowing

A protected disclosure is subject to statutory conditions. Broadly, a worker must reasonably believe that the information tends to show specified wrongdoing, reasonably believe that making the disclosure is in the public interest, and use an appropriate reporting channel. A concern may relate to wrongdoing that happened in the past, is happening now or is likely to happen.

The statutory categories include a reasonable belief that one or more of the following has occurred, is occurring or is likely to occur:

- A criminal offence, including fraud or theft;
- A breach of a legal obligation;
- A miscarriage of justice;
- Danger to health or safety;
- Damage to the environment;
- Sexual harassment; or
- Deliberate concealment of information tending to show any of the above.

Within Training Cave, relevant examples may include serious safeguarding failures, failure to act on child-protection concerns, unsafe coaching or premises, falsified attendance or qualification records, financial misconduct, unlawful discrimination, misuse of personal data, allowing an unsuitable person to work with learners, or an attempt to conceal wrongdoing.

5. Protection and Organisational Commitment

Training Cave will not tolerate dismissal, reduction of hours, threats, bullying, harassment, exclusion, unfavourable treatment or any other retaliation because a person raised a genuine concern or assisted with its examination.

Workers who make a qualifying protected disclosure may have statutory protection from detriment and, for employees, unfair dismissal. The definition of worker is broad but does not automatically cover everyone. Volunteers and genuinely self-employed people are unlikely to receive the same statutory employment protection. Training Cave will still apply its non-retaliation commitment to them and will take appropriate action against anyone who victimises a person for raising a genuine concern.

A confidentiality clause or instruction must not be used to prevent a worker from making a protected disclosure to an appropriate person or body.

6. Internal Reporting Routes

A person should normally raise a concern as soon as possible with one of the following, selecting someone who is not implicated:

- Their line manager or another manager;
- The Designated Safeguarding Lead or deputy for a child-protection concern;
- Another director where the concern involves Jack Sunderland, senior management or the DSL.

If all appropriate internal recipients are implicated, the person reasonably believes internal reporting would create a risk, evidence may be concealed, or the matter has not been addressed, they may use the relevant external route in section 11.

7. Urgent Safeguarding and Allegations

A child in immediate danger requires an emergency response: call 999. Other urgent child-protection concerns must be reported without delay to the DSL and, where necessary, the local authority children's social care service or police. The whistleblowing process must not delay action to protect a child.

A concern about an adult who works with children will be managed under the Child Protection and Safeguarding Policy. Where the allegation may meet the LADO threshold, Training Cave will seek LADO advice before beginning an internal investigation that could compromise safeguarding or criminal enquiries. A concern involving the DSL will be reported to the alternative senior person identified in that policy.

8. How To Raise a Concern

A concern may be raised verbally or in writing. The person does not need to prove the wrongdoing, conduct an investigation or obtain documents they are not entitled to access. They should provide the information they reasonably hold, including:

- What happened or may happen and why it causes concern;
- Relevant dates, locations and people;
- How the matter came to their attention;
- Whether anyone may be at immediate risk;
- Any lawful supporting information; and
- Whether the concern has already been raised and what happened.

The person should state that they are raising the matter under the Whistleblowing Policy. They should not place themselves or others at risk, secretly access records, interfere with evidence or discuss the concern more widely than necessary.

9. Confidential and Anonymous Disclosures

Training Cave will protect the identity of a person raising a concern as far as reasonably possible. Absolute confidentiality cannot be guaranteed where disclosure is required to protect a child or another person, comply with law, allow a fair process or support a police, LADO, regulator or court process. If identity may need to be disclosed, the person will normally be informed first unless that would be unsafe or unlawful.

Anonymous concerns will be considered on the available information. Anonymity can make it harder to clarify evidence, assess credibility, provide protection or give feedback. A person may instead provide their identity on a confidential basis.

10. Initial Assessment, Investigation and Outcome

Where contact details are available, Training Cave will normally acknowledge receipt within three working days. A suitably impartial person will complete an initial assessment, check immediate safety, preserve relevant records and decide whether the matter should be managed as whistleblowing, safeguarding, an allegation, a grievance, a complaint, a disciplinary matter, a data breach or through an external referral.

Any internal investigation will be proportionate, fair and independent of the person whose conduct is in question. It may involve reviewing lawful records, interviewing relevant people and obtaining professional or regulatory advice. It will not proceed in a way that compromises police, LADO, children's social care or other external enquiries.

The person raising the concern will be told that the matter has been considered and, where lawful and appropriate, whether action has been taken. Confidentiality, safeguarding and employment rights may prevent Training Cave from sharing detailed findings, personal information or disciplinary outcomes.

Possible outcomes include no further action with recorded reasons, corrective action, training or procedural change, disciplinary action, recovery of funds, and referral to the LADO, children's social care, police, DBS, a commissioner, awarding organisation, insurer or regulator.

11. External Reporting and Independent Advice

A person may report externally where internal reporting is inappropriate or unsafe, the matter has not been addressed, or the law otherwise permits it. To preserve statutory protection, a worker should use the correct prescribed person or body for the issue and meet the legal conditions for that route. A disclosure to the media or on social media is protected only in limited circumstances. Independent legal or trade-union advice should be considered before wider disclosure.

Relevant routes may include:

- NSPCC Whistleblowing Advice Line for concerns about how child protection is being handled: 0800 028 0285 or help@nspcc.org.uk;
- The local authority children's social care service for concerns about a child;
- The Local Authority Designated Officer for allegations or concerns about an adult working with children;
- The police for suspected crime, using 999 for immediate danger and 101 where appropriate for non-emergency matters;
- The Health and Safety Executive for matters within its remit;
- HM Revenue and Customs for relevant tax or financial matters;
- The Information Commissioner's Office for relevant data-protection matters; and
- The referring school, local authority or commissioner where the concern relates to commissioned provision and sharing is lawful and appropriate.

Ofsted or the Department for Education should be contacted only where Training Cave and the subject matter fall within that body's actual remit. They are not presented as universal external whistleblowing routes for this independent alternative provision.

12. Unsubstantiated or Knowingly False Allegations

A person will not face disciplinary action merely because a genuine concern is mistaken or is not substantiated. Motive does not by itself remove statutory protection. However, an allegation shown, after a fair process, to have been made deliberately and knowingly falsely may be addressed under the relevant conduct procedure. This provision must not be used to discourage concerns or punish a person for insufficient evidence.

13. Records, Data Protection and Retention

Concerns, decisions, actions, referrals and outcomes will be recorded accurately, securely and separately from routine personnel records where appropriate. Access will be restricted to those who need the information. Records will distinguish fact, allegation, professional opinion and information supplied by others and will be retained under Training Cave's retention arrangements and any safeguarding or legal requirements.

Information will be shared only when necessary and lawful. Whistleblowing records may contain safeguarding, criminal-offence, employment and special-category data and will receive appropriate protection.

14. Responsibilities, Training and Monitoring

The Director is responsible for ensuring that this policy is accessible, that reporting routes remain workable and that no one suffers retaliation. Managers and the DSL must recognise

potential whistleblowing, act on immediate risk, maintain confidentiality and obtain appropriate advice. All personnel will be introduced to this policy during induction and reminded how to raise a concern.

Management will monitor themes, delays, retaliation concerns and whether corrective action has been completed. Reporting will protect identities and confidential details.

15. Review

This policy will be reviewed annually and sooner after a significant concern, material legal or guidance change, an identified weakness in reporting arrangements or a change in organisational structure.

16. Related documents

- Child Protection and Safeguarding Policy;
- Safer Recruitment Policy;
- Staff Code of Conduct and professional boundaries arrangements;
- Allegations and low-level concerns procedure;
- Compliments Comments and Complaints Policy;
- Grievance and disciplinary procedures;
- Health and Safety Policy; and
- Data Protection Policy and retention arrangements.

17. Contact details

Training Cave Club Ltd
Unit 10, Carrmills Business Centre
Birstall
WF17 9JX
Email: info@trainingcave.co.uk

Immediate safeguarding concerns must be reported through the Child Protection and Safeguarding Policy. The current DSL, deputy and alternative escalation arrangements are identified in that policy and displayed for personnel.