Whistleblowing Protection Policy

October - 2026

Policy Name: Whistleblowing Protection Policy

Description: Guidance and procedure for whistleblowing - Sets out procedures of **tangerine:ed Ltd** to govern the receipt, retention, and treatment of complaints or concerns relating to ethical, legal, regulatory, Code of Conduct or Ethics or compliance policy breaches.

Version No.	Amendments	Issue Date	Issued By
1.0		28 Oct 2026	GC (Director)
		28 Oct 2026	EL (Director)

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1. Policy Statement

tangerine:ed Ltd is committed to conducting its business with honesty, integrity, transparency, and accountability. We encourage all employees, contractors, consultants, agency workers, and volunteers to raise genuine concerns about any suspected wrongdoing, malpractice, illegal activity, or unethical behaviour affecting the company, its clients, students, partners, or the wider public.

This policy provides a safe and confidential framework for individuals to report concerns without fear of retaliation, victimisation, or dismissal.

tangerine:ed Ltd takes all whistleblowing concerns seriously and will investigate them promptly and fairly.

2. Purpose

The purpose of this policy is to:

- Encourage individuals to report concerns at an early stage.
- Provide clear procedures for raising concerns.
- Ensure concerns are properly investigated.
- Protect whistleblowers from detrimental treatment.
- Support compliance with the Public Interest Disclosure Act 1998 (PIDA) and other applicable UK legislation.

3. Scope

This policy applies to:

- Employees
- Directors
- Consultants
- Contractors
- Agency staff
- Volunteers
- Work experience placements
- Any other individuals working on behalf of **tangerine:ed Ltd**

This policy covers concerns raised in the public interest and is distinct from personal employment grievances, which should be addressed through the company's Grievance Policy.

4. What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected wrongdoing or dangers at work that are believed to be in the public interest.

Examples include, but are not limited to:

Criminal Activity

- Fraud
- Theft
- Bribery
- Corruption
- Financial misconduct

Legal or Regulatory Breaches

- Breaches of education regulations
- Data protection violations
- Non-compliance with safeguarding requirements
- Failure to comply with immigration or visa regulations

Risks to Health and Safety

- Unsafe working practices
- Risks to students, staff, or visitors
- Failure to follow safeguarding procedures

Environmental Damage

- Actions causing environmental harm
- Failure to comply with environmental regulations

Misconduct or Unethical Behaviour

- Abuse of authority
- Serious professional misconduct
- Conflicts of interest
- Deliberate concealment of wrongdoing

Misuse of Company Resources

- Financial irregularities
- Misappropriation of assets
- Unauthorised use of confidential information

5. Safeguarding Concerns

As an education-focused organisation, safeguarding concerns involving children, young people, or vulnerable adults must be reported immediately.

Where there is an immediate risk of harm, appropriate emergency services and safeguarding authorities should be contacted without delay.

Safeguarding concerns will be treated as a priority and managed in accordance with applicable safeguarding procedures and legal obligations.

6. Protection for Whistleblowers

tangerine:ed Ltd will not tolerate retaliation against any individual who raises a genuine concern in good faith. Protected individuals will not be subjected to:

- Dismissal
- Disciplinary action
- Loss of opportunity
- Harassment or bullying
- Victimisation
- Any other detrimental treatment

Any employee found to have retaliated against a whistleblower may be subject to disciplinary action, including dismissal.

Protection applies even if the concern is ultimately found to be mistaken, provided it was raised honestly and in good faith.

7. Confidentiality

The company will make every reasonable effort to protect the identity of individuals who raise concerns. Information will only be disclosed where:

- It is necessary for a proper investigation;
- Required by law;
- Required by a regulatory authority; or
- Necessary to protect others from harm.

Individuals are encouraged to identify themselves when raising concerns, as anonymous reports can be more difficult to investigate. However, anonymous disclosures will be considered wherever sufficient information is provided.

8. How to Raise a Concern

Concerns should normally be raised with:

First Contact

Company Director

Email: edwina.laycock@tangerineed.com

Alternative Contact

Company Director

Email: graham.colloby@tangerineed.com

Where the concern involves a director or the individual feels uncomfortable raising the matter with management, concerns may be submitted directly to another senior member of the company.

The disclosure should include:

- Nature of the concern
- Relevant dates and locations
- Names of those involved (where known)
- Supporting evidence if available
- Any steps already taken

Proof is not required. Individuals should simply have a reasonable belief that the information disclosed is true.

9. Investigation Procedure

Upon receiving a disclosure, **tangerine:ed Ltd** will:

Stage 1: Initial Assessment

- Acknowledge receipt where appropriate.
- Conduct an initial review.
- Determine whether the matter falls within this policy.

Stage 2: Investigation

- Appoint an appropriate investigator.
- Gather evidence.
- Interview relevant individuals where necessary.
- Maintain confidentiality wherever possible.

Stage 3: Outcome

- Determine whether the concern is substantiated.
- Implement any necessary corrective actions.
- Consider disciplinary or legal action where appropriate.
- Inform the whistleblower, where possible and lawful, that the investigation has concluded.

10. External Reporting

The company encourages concerns to be raised internally whenever possible.

However, individuals may report matters externally to an appropriate prescribed person or regulator where permitted under UK law.

Examples may include:

- Department for Education
- Information Commissioner's Office (ICO)
- Health and Safety Executive (HSE)
- Police or other enforcement agencies

Independent advice may be obtained from:

- Protect (Whistleblowing Advice Service)

11. Malicious or Knowingly False Allegations

Individuals who deliberately make false, malicious, or vexatious allegations may be subject to disciplinary action.

However, concerns raised honestly and in good faith will not result in disciplinary action even if the allegation is not ultimately upheld.

12. Record Keeping

The company will maintain secure records of:

- Concerns raised
- Investigations conducted
- Findings
- Actions taken

Records will be retained in accordance with legal, regulatory, and data protection requirements.

13. Monitoring and Review

The Directors of **tangerine:ed Ltd** are responsible for the implementation and effectiveness of this policy. This policy will be reviewed annually or sooner if required by changes in legislation, regulation, or company operations.