

Whistleblowing Procedure

Version	Approved by the Directors	Last revised	Next review	Owner
V1.0	2026-10-28	2026-10-28	2027-10-28	Compliance Lead

Policy statement

The Management Academy Ltd, trading as AiCore ("AiCore"), is committed to honesty, integrity and accountability in everything it does. AiCore wants people to raise genuine concerns about possible malpractice, and will treat every concern seriously, in confidence and without tolerating victimisation, discrimination or disadvantage against the person who raised it. This procedure is approved by the Directors and published on theaicore.com.

Scope

This procedure applies to all AiCore staff and to the occasional freelancers who work for AiCore. It is readily available to everyone who does work related to AiCore's delivery of government-funded apprenticeships.

A concern covered by this procedure is one the person reasonably believes is in the public interest and relates to, for example:

- a criminal offence, including fraud, bribery or financial mismanagement;
- a breach of a legal obligation, including a breach of funding or contractual requirements;
- a miscarriage of justice;
- a danger to health and safety, or damage to the environment;
- modern slavery or sexual harassment;
- deliberate concealment of any of the above.

This procedure does not cover:

- **Personal grievances** that relate only to the person's own employment or treatment, which should be raised with a line manager or a Director.
- **Safeguarding concerns**, which must be reported to the Designated Safeguarding Lead under the Safeguarding Policy.
- **Complaints from learners or employers**, which are handled under the Complaints Procedure.

Concerns that safeguarding concerns have been mishandled or concealed may be raised under this procedure. If a person is unsure which route applies, they may ask the Compliance Lead for

advice in confidence.

Responsibilities

- **The Compliance Lead** owns this procedure, receives and assesses concerns, arranges investigations, keeps records and keeps the person who raised the concern informed.
- **The Directors** approve this procedure and any amended version, receive concerns involving the Compliance Lead or a Director, and ensure that action is taken and that no one suffers detriment for raising a concern.
- **All staff and freelancers** must raise concerns promptly, must not victimise anyone who does so, and must keep any investigation confidential, except when raising it outside AiCore or seeking advice or representation.

Raising a concern

A concern may be raised in writing or in person.

- Concerns should be sent to the Compliance Lead at compliance@theaicore.com, or raised directly with the Compliance Lead. Only the Compliance Lead reads this mailbox.
- If the concern involves the Compliance Lead, it should be raised with a Director.
- If the concern involves a Director, it should be raised with the other Director, or reported directly to the Department for Education, or the person may seek confidential advice from Protect (see Raising a concern outside AiCore).
- Concerns should be raised in the person's own name. AiCore will protect their identity (see Confidentiality and protection from victimisation).

A concern should say what has happened or may happen, who is involved, when and where, and how the person knows. The person does not need proof. A concern raised in the reasonable belief that it is true and in the public interest is protected even if it turns out to be mistaken.

How AiCore handles a concern

1. **Acknowledgement.** AiCore will acknowledge the concern in writing within 5 working days.
2. **Initial assessment.** The Compliance Lead (or a Director, where the concern involves the Compliance Lead; or the other Director, where it involves a Director) will decide whether the concern falls under this procedure and what action is needed. They will consider at the outset whether the concern must be reported to the Department for Education or another body, and will report suspected fraud or financial irregularity under the Anti-Fraud and Administrative Malfunction Procedure. If AiCore decides not to take the matter forward, it will tell the person within 5 working days of that decision, with reasons and the right route where there is one.

3. **Investigation.** The person handling the concern will appoint an investigator independent of the matter, who will investigate fairly and promptly. The person who raised the concern may be asked for further information.

4. **Outcome.** AiCore will give the person a written response, as far as confidentiality and the law allow, normally within 28 days of acknowledgement. If the investigation will take longer, AiCore will tell the person the revised timescale within that period and keep them updated.

5. **Action.** Where malpractice is found, AiCore will take appropriate corrective action, which may include disciplinary action and, where required, reporting to the police, a regulator or the Department for Education.

6. **Records.** Records of concerns and investigations are kept securely and shared only with those who need them.

If the person is not satisfied with how AiCore has handled the concern, they may raise it with the Directors or, where a Director handled the concern, use an outside route.

Confidentiality and protection from victimisation

- AiCore will keep the identity of the person raising a concern confidential and will not disclose it without their consent, unless required by law or necessary to deal with the concern properly. In that case AiCore will tell the person first wherever lawful and practicable.
- No one will suffer dismissal, victimisation, discrimination or other disadvantage for raising a concern under this procedure or for taking part in an investigation. This protection applies to everyone covered by this procedure. Workers also have legal protection under the Public Interest Disclosure Act 1998 when they make a protected disclosure; Protect can advise on whether this applies.
- Anyone who victimises or threatens a person for raising a concern, or who tries to prevent a concern being raised, will be subject to disciplinary action.
- No agreement or clause can stop a person making a protected disclosure.
- A person who makes an allegation they know to be false may be subject to disciplinary action.
- Anyone who believes they have suffered detriment should tell the Compliance Lead or the Directors immediately.

Raising a concern outside AiCore

AiCore wants to hear and resolve concerns itself first, but staff and freelancers are free to raise them outside AiCore.

- **Directly to the Department for Education.** Staff can make a disclosure to the Department for Education by following [Blowing the whistle to the Department for Education](#). Post-16 providers' staff can use the customer help portal, with an option to stay anonymous, or write to the Department's Customer Service Team. Suspected fraud can also be reported to allegations.mailbox@education.gov.uk.
- **Government guidance.** [Whistleblowing for employees](#) explains who to tell and what to expect.
- **Independent advice.** [Protect](#), the whistleblowing charity, gives free and confidential advice on 0203 117 2520.

Training and communication

New staff are told about this procedure at induction. It is published on theaicore.com, where all staff and freelancers can read it.

Monitoring and review

The Compliance Lead will review this procedure at least annually, and sooner after any significant concern or change in law or funding requirements. The Directors must approve any amended version.

Contacts

- **Compliance Lead:** compliance@theaicore.com
- **Directors:** Haron Shams, haron@theaicore.com; Christian Kerr, christian@theaicore.com
- **Department for Education:** [Blowing the whistle to the Department for Education](#)
- **Protect:** 0203 117 2520, protect-advice.org.uk