



Whistleblowing Policy

National Talent Academy Limited

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2.0	February 2026	National Talent Academy	New policy created; aligned to Public Interest

			Disclosure Act 1998, TQUK endorsement model and NTA delivery model
2.1	September 2026	National Talent Academy	Added a document control block recording the document owner, status, date published, next scheduled review and contact. Set the review frequency to annual. Corrected the description of certification: TQUK issues the certificate for the full Level 3 Award and NTA issues certificates for individual units, including the mandatory unit.
2.2	September 2026	National Talent Academy	Updated the name of the Equity, Diversity and Inclusion Policy in the list of related policies, following its renaming. No other change.

For use in National Talent Academy policy development

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1. Introduction

1.1 About National Talent Academy

National Talent Academy (NTA) is an educational technology company providing online qualifications in essential work skills for 16–19 year olds and adult learners in Further Education colleges, schools and training providers across the UK.

NTA was founded in 2020 by Cambridge graduate David Jaffa, who previously founded SAM Learning (online GCSE/KS3 revision used in hundreds of UK schools) and Penda Learning (online science/maths for US schools, sold 2019). David received the 2021 BETT Outstanding Achievement Award for his lifetime achievements in EdTech.

1.2 Purpose of This Policy

NTA is committed to the highest standards of integrity, openness and accountability. This policy provides a framework for individuals to raise concerns about wrongdoing, malpractice or improper conduct connected with NTA's activities, without fear of reprisal or victimisation.

Whistleblowing is the term used to describe when an individual discloses information about wrongdoing or a risk of wrongdoing that affects others or is in the public interest. NTA takes all whistleblowing disclosures seriously and will investigate them in a sensitive and discreet manner.

1.3 Scope

This policy applies to the NTA Level 3 Award in Essential Work Skills, which is an unregulated qualification endorsed by Training Qualifications UK (TQUK) as a Certified Learning Course (CLC). TQUK issues the certificate for the full Level 3 Award; NTA issues certificates for individual units, including the mandatory unit.

This policy may be used by:

- NTA staff (including employees, contractors and consultants).
- Delivery partner staff (including managers, teachers, assessors and administrators at FE colleges, schools, sixth forms and training providers).
- Learners enrolled on NTA programmes.
- TQUK personnel.
- Any other individual who has a concern about wrongdoing connected with NTA's activities.

1.4 Legal Framework

The Public Interest Disclosure Act 1998 (PIDA) provides legal protection for workers who make a qualifying disclosure about wrongdoing in the public interest. Under PIDA, a worker who raises a concern is protected from dismissal or detriment by their employer, provided the disclosure meets the requirements of the Act.

NTA is not a prescribed body under PIDA. This means that while NTA will treat all disclosures seriously and investigate them in accordance with this policy, NTA cannot itself confer the statutory protections provided by PIDA. However, NTA is fully committed to ensuring that no individual suffers detriment as a result of raising a genuine concern under this policy.

1.5 Review

This policy is reviewed annually and may be revised in response to feedback, changes in legislation or guidance from TQUK. Copies are available at hello@nationaltalent.org or via www.nationaltalent.org.

2. What Is Whistleblowing?

2.1 Definition

Whistleblowing is the disclosure of information by an individual who reasonably believes that wrongdoing has occurred, is occurring or is likely to occur, and that the disclosure is in the public interest. This means the concern must affect others – such as learners, delivery partners, the public or the integrity of qualifications – rather than being a purely personal matter.

2.2 Types of Wrongdoing

A whistleblowing disclosure may relate to any of the following types of wrongdoing:

Type of Wrongdoing	Examples in an NTA Context
Criminal offences	Fraud, theft, falsification of records, identity fraud in assessment.
Failure to comply with a legal obligation	Breaches of data protection law, health and safety law, safeguarding duties or equality legislation.

Miscarriages of justice	A learner being unfairly penalised or denied certification due to improper procedures.
Danger to the health or safety of any individual	Unsafe working or learning conditions, failure to act on a safeguarding concern.
Damage to the environment	Actions that cause or are likely to cause environmental harm.
Deliberate concealment of any of the above	Attempting to cover up or prevent the reporting of any of the above types of wrongdoing.
Malpractice or maladministration	Manipulation of assessment results, improper assistance to learners, fraudulent claims for certificates, deliberate failure to follow NTA or TQUK procedures.
Financial impropriety	Misuse of funds, fraudulent invoicing, corruption, bribery.

This list is not exhaustive. If an individual is unsure whether their concern constitutes whistleblowing, they should contact NTA or seek independent advice from Protect (see Section 5).

2.3 What Whistleblowing Is Not

It is important to distinguish whistleblowing from other types of concern. The following table sets out the key distinctions:

Concern Type	Description	Which Policy Applies
Whistleblowing disclosure	A concern about wrongdoing that affects others or the public interest – for example, malpractice, fraud, safety risks or concealment of wrongdoing.	This Whistleblowing Policy.
Complaint	Dissatisfaction with a service received from NTA – for example, concerns about fees, quality of support or contractual disputes.	Complaints Policy.
Appeal	A challenge to an assessment decision, a sanction or the outcome of a malpractice investigation.	Enquiries and Appeals Policy.

Personal grievance	A personal workplace issue such as bullying, harassment or discrimination experienced by an NTA staff member.	NTA's internal grievance procedure.
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If a concern is raised under this policy and NTA determines that it is more appropriately dealt with under a different policy, NTA will redirect the matter accordingly and inform the individual.

3. Principles

NTA's approach to whistleblowing is based on the following principles:

- NTA encourages a culture of openness in which individuals feel confident and supported in raising concerns about wrongdoing. No individual should feel that raising a genuine concern will result in negative consequences for them.
- All disclosures will be taken seriously and will be investigated promptly and thoroughly.
- NTA will protect the confidentiality of individuals who raise concerns, to the extent that this is possible (see Section 6).
- NTA will not tolerate any form of victimisation, harassment or detriment directed at an individual because they have raised, or are believed to have raised, a concern under this policy. Any such conduct will itself be treated as a serious matter and may result in disciplinary action.
- Individuals are not expected to prove that their concern is well-founded. However, they should have a reasonable belief that the information they are disclosing is substantially true and that the disclosure is in the public interest.
- Where a concern is raised in good faith but is not upheld following investigation, no action will be taken against the individual who raised it.

4. How to Raise a Concern

4.1 Information to Provide

When raising a concern, individuals should aim to provide as much information as possible to enable NTA to investigate effectively. This may include:

- The background and history of the concern.
- Specific details including names, dates, times and places.
- Details of any evidence that supports the concern.
- The NTA programme, delivery partner or activity to which the concern relates.
- The individual's involvement in the matter (if any) and any personal interest they may have.
- How they believe the matter might be resolved.

4.2 How to Submit a Disclosure

Disclosures may be submitted:

- By email to hello@nationaltalent.org, marked 'Whistleblowing – Confidential'.
- In writing to the Director, David Jaffa, at 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, WA14 2DT, marked 'Whistleblowing – Confidential'.
- Verbally (by telephone or in person) to the Director. Where a disclosure is made verbally, NTA will prepare a written record and ask the individual to confirm its accuracy.

4.3 Concerns About NTA Itself

Where the concern relates to NTA itself, or to the Director personally, and the individual does not feel able to raise the concern with NTA, they may raise it directly with TQUK or seek independent advice from Protect (see Section 5).

5. Reporting Routes

The following table sets out the available reporting routes:

Reporting Route	When to Use	Contact Details
1. NTA directly	In most cases, concerns should be raised with NTA in the first instance. NTA will investigate the disclosure in accordance with this policy.	Email: hello@nationaltalent.org Director: David Jaffa
2. TQUK	Where the concern relates to NTA itself and the individual is not satisfied that NTA has adequately investigated, or	Contact details available at www.tquk.org

	where the concern relates to the integrity of the qualification endorsed by TQUK.	
3. Protect (formerly Public Concern at Work)	An independent whistleblowing charity that provides free, confidential advice to anyone considering raising a concern about wrongdoing in their workplace.	Helpline: 020 3117 2520 Website: www.protect-advice.org.uk
4. Other external bodies	Where the concern involves a criminal offence, safeguarding issue or other matter that falls within the remit of another body (e.g. the police, local authority, ICO, DfE).	Contact the relevant authority directly.

NTA encourages individuals to raise concerns with NTA in the first instance wherever possible, as this allows NTA to investigate and take corrective action quickly. However, NTA recognises that there may be circumstances where it is more appropriate to report directly to an external body.

6. Confidentiality and Anonymity

6.1 Confidentiality

NTA understands the importance of confidentiality for individuals who raise concerns. Where an individual requests that their identity be kept confidential, NTA will take all reasonable steps to protect their anonymity. However, NTA cannot guarantee confidentiality in all circumstances. NTA may need to disclose the individual's identity where:

- Required by law (for example, in the course of a police investigation or legal proceedings).
- The information is needed to enable NTA to investigate the matter effectively.
- The individual may be identifiable due to the nature or circumstances of their concern.

Where it becomes necessary to disclose the individual's identity, NTA will inform them in advance wherever possible and will discuss the implications with them.

6.2 Anonymous Disclosures

NTA will accept anonymous disclosures. However, individuals should be aware that it may be more difficult for NTA to investigate a concern effectively if it cannot contact the individual for further information or clarification. NTA encourages individuals to provide their name and contact details, with an assurance of confidentiality, rather than raising concerns anonymously.

Anonymous disclosures will be assessed on their merits. NTA will consider the seriousness of the concern, the credibility of the information provided and whether the matter can be investigated without the individual's cooperation.

7. How NTA Will Respond

NTA will follow a structured process when responding to a whistleblowing disclosure:

Step	Stage	Description
1	Acknowledgement	NTA will acknowledge receipt of the disclosure within 5 working days (where the individual has provided contact details). NTA will confirm who will be handling the matter and how to contact them.
2	Initial assessment	NTA will carry out an initial assessment to determine whether the disclosure falls within the scope of this policy and whether there are sufficient grounds to investigate. If the matter is more appropriately dealt with under another policy (e.g. Complaints, Malpractice), NTA will redirect it accordingly and inform the individual.
3	Investigation	Where an investigation is warranted, NTA will appoint a suitably senior and independent person to investigate. The investigation will be conducted sensitively and discreetly. The investigator will seek to establish the full facts, collecting evidence as appropriate (witness statements, records, platform data, emails). NTA may involve external expertise where necessary.
4	Outcome	On completion of the investigation, NTA will determine what action (if any) is required. This may include disciplinary action, changes to procedures, referral to

		TQUK, referral to external authorities or no further action. NTA will communicate the outcome to the individual who raised the concern, to the extent possible without breaching confidentiality obligations to others.
5	Record keeping	NTA will maintain a confidential record of all whistleblowing disclosures, including the nature of the concern, the investigation conducted, the outcome and any action taken. Records are stored securely and retained in accordance with NTA's data retention schedule.
6	Notification to TQUK	Where a confirmed disclosure involves matters that affect the integrity of the NTA qualification or certification, or where the matter constitutes proven malpractice or maladministration, NTA will notify TQUK of the investigation and its outcome.

NTA aims to complete investigations within 20 working days of the initial assessment. Where a more complex investigation is required, NTA will keep the individual informed of progress and provide an estimated timescale for completion.

8. Protection from Detriment

NTA will not tolerate any form of victimisation, harassment or detrimental treatment of an individual because they have raised a concern under this policy. This applies to NTA staff, delivery partner staff, learners and any other individual.

Examples of detrimental treatment include (but are not limited to):

- Dismissal or threat of dismissal.
- Demotion, loss of opportunity or unfavourable treatment.
- Harassment, bullying or intimidation.
- Exclusion from activities, meetings or communications.
- Any other action that places the individual at a disadvantage because they raised a concern.

Any NTA staff member or delivery partner staff member found to have subjected an individual to detrimental treatment for raising a concern will face disciplinary action, which may include termination of their role or the imposition of sanctions under NTA's Sanctions Policy.

If an individual believes they have suffered detriment as a result of raising a concern under this policy, they should report this to NTA immediately. NTA will investigate the matter and take appropriate action.

9. Malicious or Vexatious Disclosures

While NTA encourages all genuine concerns to be raised, the making of deliberately false, malicious or vexatious allegations is a serious matter. Where NTA determines that a disclosure was made in bad faith – for example, with the intent to cause harm to another individual or to disrupt NTA’s activities without any genuine belief that wrongdoing has occurred – this may be treated as a disciplinary or malpractice matter.

An allegation that is made in good faith but which is not upheld following investigation will not be treated as malicious. NTA recognises that raising a concern takes courage, and no individual will be penalised for raising a concern that turns out to be unfounded, provided it was raised in good faith.

10. Responsibilities

10.1 Director (David Jaffa, Founder)

- Overall responsibility for ensuring this policy is implemented effectively.
- Receiving and overseeing the investigation of whistleblowing disclosures.
- Ensuring that individuals who raise concerns are protected from detriment.
- Reporting confirmed wrongdoing to TQUK and other relevant bodies where required.

10.2 NTA Management

- Promoting a culture of openness in which individuals feel supported in raising concerns.
- Ensuring all staff and delivery partners are aware of this policy.
- Appointing suitably qualified investigators where required.
- Maintaining confidential records of all whistleblowing disclosures and outcomes.

10.3 Delivery Partners

- Ensuring that their staff and learners are aware of NTA's Whistleblowing Policy and how to raise a concern.
- Supporting NTA in the investigation of any disclosure that relates to their organisation.
- Ensuring that no individual suffers detriment for raising a genuine concern.

10.4 All Individuals

- Raising genuine concerns about wrongdoing promptly and providing as much information as possible.
- Cooperating with NTA's investigation where reasonably asked to do so.
- Maintaining the confidentiality of any investigation they are involved in.

11. Related Policies

This policy should be read in conjunction with the following NTA policies:

- Malpractice and Maladministration Policy.
- Complaints Policy.
- Enquiries and Appeals Policy.
- Sanctions Policy.
- Safeguarding Policy.
- Equity, Diversity and Inclusion Policy.
- Data Protection and Privacy Policy.
- Conflict of Interest Policy.

12. Contact Information

To raise a whistleblowing concern with NTA:

Email: hello@nationaltalent.org (mark 'Whistleblowing – Confidential')

Post: Director, National Talent Academy, 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, WA14 2DT

Website: www.nationaltalent.org

For independent advice on whistleblowing:

Protect: 020 3117 2520 | www.protect-advice.org.uk