

## **Whistleblowing Policy**

### **Purpose**

Next Steps Ed is committed to the highest standards of openness, transparency, and accountability.

An important aspect of accountability and transparency is a system that enables staff and 'other members' of Next Steps to voice concerns in a responsible and effective manner. 'Other members,' for the purposes of this policy, includes students, referrers, employers, agency staff, contractors and other professionals.

It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about their employer's affairs. Nevertheless, where an individual discovers information that they believe shows serious malpractice or wrongdoing within the organisation, then this information should be disclosed internally without fear, reprisal or victimisation and there should be arrangements to enable this to be done independently of line management.

The Public Interest Disclosure Act, which came into effect in 1998, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Prime8 Education has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe that they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by Next Steps Ed, nor should it be used as a tool to revisit any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Next Steps Ed considers it reasonable to expect employees to utilise this policy rather than air their concerns outside of the company.

### **Scope**

This policy is designed to enable employees of Next Steps Ed to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. Concerns may be raised with any member of the management team or a director. This policy is intended to cover concerns which are in the public interest and may at least be initially investigated separately, but then might lead to starting of other procedures, e.g., following an investigation, disciplinary procedure.

These concerns could include:

- Financial malpractice or impropriety, or fraud, on any scale.
- Failure to comply with a legal obligation.
- Failure to comply with Safeguarding legislation and our Safeguarding policies.

- Failure to provide a safe service that facilitates the detection and prevention of abuse.
- Disregard to the health and/or safety of any person, or environment issues/dangers.
- Any form of criminal activity.
- Improper conduct or unethical behaviour including the misuse of Information Technology (I.T.), internal and external social chat sites and cyber-bullying
- Knowing use of discriminatory practices
- Attempts to conceal any of the above.

## **Protection**

This policy is designed to give protection to persons who disclose such matters, provided the disclosure is made:

- a) In good faith
- b) In the reasonable belief that it shows malpractice or impropriety and if they make the disclosure to an appropriate person e.g., a senior manager or director

It should be noted, however, a malicious or wild accusation could give rise to legal action on the part of the persons complained about and an internal investigation.

## **Confidentiality**

Next Steps Ed will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation will be kept confidential so long as this does not hinder the resulting investigation. However, in most circumstances and in particular alleged harassment or bullying, the individual will be required to provide a statement as part of the evidence required.

## **Anonymous Allegations**

Next Steps Ed encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible but may still be investigated at the discretion of the company. When deciding whether to investigate an anonymous allegation, Next Steps Ed will consider the seriousness and credibility of the allegation, and also the likelihood of being able to confirm the allegation without using the knowledge of the discloser.

## **Untrue Allegations**

If an individual makes an allegation in good faith which is not confirmed by subsequent investigation, no action will be taken against that individual. An individual should, however, exercise due care to ensure the accuracy of the information on which they base their disclosure.

If, however, an individual makes malicious or repeatedly untrue allegations, following an investigation, the disciplinary procedure may be undertaken against that individual which could result in disciplinary action up to and including dismissal.

## **Timescales**

Due to the variety of the nature of possible complaints that could arise through this system it is not possible to lay down precise timescales for investigations. It is assumed that the investigator(s) will conduct the investigation as swiftly as is possible without compromising its integrity. The discloser should be kept informed, in writing, of developments at any key stage of the investigation.

## **Investigators**

Any investigation will be undertaken by the senior manager(s) or director(s). No person implicated in the allegations will take part in the investigation. Staff may not be aware that an investigation is taking place regarding concerns until interviewed by the Investigator. No-one being interviewed as part of an investigation is entitled to advance notification of the interview, nor have they the right to be represented or accompanied. The alleged offender will normally be interviewed as part of the investigation.

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Completed by: Mica Smith - Director