Whistle-blowing Policy

Safeguarding is Everyone's Responsibility

Next Steps Education Ltd is committed to the highest possible standards of honesty, openness, probity and accountability. It seeks to conduct its affairs in a responsible manner, to ensure that all its activities are open and effectively managed, and that integrity and principles of public interest disclosure are sustained.

In line with that commitment we encourage employees, those working on behalf of Next Steps Education Ltd and others that we deal with, who have serious concerns about any aspect of the agency's work to come forward and voice those concerns with a Director (Liz Fancourt or Sarah Logan).

Where a member of staff decides to report a serious incident, there will be no adverse repercussions for a person making a protected internal disclosure, unless where an allegation is frivolous, malicious or made for personal gain. Concerns will be treated sensitively and confidentially so far as reasonably practicable. Information will only be shared with those who need it to assess or investigate the concern, or where disclosure is required by law, safeguarding responsibilities or procedural fairness. Where possible, the whistleblower will be informed before their identity is disclosed. Anonymous concerns will be considered seriously, although anonymity may limit the Company's ability to investigate the matter or provide feedback. Whether a disclosure qualifies for statutory protection will depend upon the nature of the information disclosed and whether the worker reasonably believes that the disclosure is made in the public interest

Purpose of the Policy

Employees are often the first to realise that there may be something seriously wrong within an organisation. However, staff may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the agency. They may also fear harassment or victimisation. Each person working for or contracted to Next Steps

Education Ltd needs to realise that they not only have a right, but also a duty to report any improper actions or omissions.

Next Steps Education Ltd also recognises and appreciates that employees who raise concerns regarding malpractice or wrongdoing are an asset to the agency, not a threat. This policy makes it clear that they can raise concerns without fear of victimisation, subsequent discrimination or disadvantage.

The whistle blowing policy is intended to encourage and enable employees to raise serious concerns within the agency. Although this can be difficult this is particularly important where the welfare of children may be at risk. Remember it is often the most vulnerable children or young person who is targeted. These children need someone like you to safeguard their welfare.

This policy aims to:

- encourage staff and contractors to feel confident in raising concerns and to question and act upon their concerns about practice
- provide avenues to raise those concerns and receive feedback on any action taken
- ensure that staff receive a response to their concerns and that they are aware of how to pursue them if they are not satisfied
- reassure staff that they will be protected from possible reprisals or victimisation if they have reasonable belief that they have made any disclosure in good faith.

Who is covered by this policy?

The policy applies to all employees whether full-time or part-time, permanent or temporary; members of staff and those carrying out work for the business on business or client premises, for example agency workers, contractors, consultants. It also covers providers of works, services and supplies, including the business's external contractors and those providing services under a contract with the school in their own premises.

However, to facilitate the reading of this policy, the terms 'staff' or 'members of staff' have been used, with the intention to cover all individuals mentioned above.

Scope of the policy

There are existing procedures in place to enable employees to lodge a grievance relating to their employment. The whistle blowing policy is intended to cover serious concerns

that fall outside the scope of other procedures, in accordance with the Public Interest Disclosure Act 1998.

These include:

- Conduct which is an offence or breach of the law
- Failure to comply with a legal obligation
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other employees/staff
- Damage to the environment
- Information relating to the above issues that have been or is likely to be deliberately concealed.

Examples of the above categories are likely to include:

- The unauthorised use or misuse of public funds
- Possible fraud or corruption
- Sexual, physical or psychological abuse of service users
- Harassment and bullying of staff
- Breaches of codes of conduct

Therefore, any serious concerns that a member of staff has about any aspect of service provision or the conduct of the Proprietor, employees, others acting on behalf of the business or service users, can be reported under the whistle blowing policy where the member of staff has a reasonable belief in those concerns and they relate to one of the specific areas set out above.

Safeguarding against harassment or victimisation

Next Steps Education Ltd is committed to good practice and high standards and wants to be supportive of employees. It is recognised that the decision to report a concern can be a difficult one to make. If a member of staff has a reasonable belief that what they are saying is true, they have nothing to fear because they will be doing their duty to their employer and/or those for whom they provide a service.

The business will take a zero tolerance approach to any act of harassment or victimisation (including informal pressures). The agency will take appropriate action to protect staff when they raise a concern, by supporting the member of staff and consider action under the appropriate procedure (for example disciplinary) against the person or persons responsible for the reported acts, provided the member of staff:

- Discloses the information in good faith
- Believes the concern is true

- Does not act maliciously or make false allegations
- Does not seek any personal gain, and
- Provided the allegations relate to one of the categories covered by the scope of the policy and referred to above.

There are national guidelines to help you as a whistle blower. You can find out more on the protection of whistle blowers from the Information Commissioner's Office (ICO).

Unsubstantiated allegations

If a member of staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken.

Confidentiality

All concerns will be treated in confidence but at the appropriate time, the whistle blower may be asked to come forward as a witness, and this will be discussed with them.

Anonymous allegations

This policy encourages staff to put their name to their allegation whenever possible.

The agency will take all concerns raised seriously. When carrying out an initial review of a concern, Next Steps Education Ltd will consider the following factors:

- The seriousness of the issues raised
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Reasons for ‘whistle blowing’

- To prevent worsening or widening
- To protect or reduce risks to others

- To safeguard children
- To prevent becoming implicated yourself

What stops people from 'whistle blowing'

- Starting a chain of events which spiral
- Disrupting work or events
- Fear of getting it wrong
- Fear of repercussions or damaging careers
- Fear of not being believed

How to raise a concern

- Staff members may raise concerns with their immediate manager, any of the Directors or the Designated Safeguarding Lead (Liz Fancourt)
- If your concern is about a Director, contact the alternative Director.
- Concerns may be raised verbally or in writing. Staff members who wish to make a written report are asked to provide the background and history of the concern (including relevant dates) and the reason why they are particularly concerned about the situation.
- The earlier the concern is expressed, the easier it is to take action. In order to assist with investigation, staff members should provide as much detail and supporting evidence as possible.
- A member of staff is not expected to prove that an allegation is true, only to have sufficient grounds for concern.
- While concerns will usually be raised internally, Next Steps Education Ltd recognises that employees may feel unable to do this, and that they may wish to contact an independent, external organisation such as the NSPCC Whistleblowing helpline hotline on; (0800 028 0285, 8am - 8pm Mon - Fri, Email; help@nspcc.org.uk).
- A third option for employees who wish to raise concerns is to contact the Public Concerns at Work helpline 020 7404 6609. This helpline offers independent and confidential advice to workers who are unsure whether or how to raise a public interest concern.

How Next Steps Education Ltd will respond

Next Steps Education Ltd will investigate and respond to all concerns raised by staff members or service users through any channels.

While it is not essential that the concerns be provided in writing, the person receiving the concern, will ensure that a written account of it is made. This will help with the subsequent investigation by facilitating clear record keeping.

When a concern is raised directly with Next Steps Education Ltd, they should undertake the following actions:

- Take the concern seriously
- Consider the concerns fully and objectively
- Recognise that raising a concern can be a difficult experience for employees
- Ensure confidentiality
- Refer to a manager of appropriate seniority, to agree the level at which the concern will be investigated and identify who will take responsibility for coordinating the enquiry.
- Staff members who are under investigation will not be involved in the investigation.

Initial enquiry

In order to protect the individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. If urgent action is required, this will be taken before any investigation is conducted.

Purpose of the initial enquiry is to ascertain if the conduct or behaviour involves a member of staff, a Director or other member of staff, so that further enquiries and investigation can be progressed accordingly.

Preliminary enquiry

Preliminary enquiry establishes need to carry out an investigation. Further to the results of the initial and preliminary enquiries, and at the discretion of the Directors, the following steps will then need to be considered:

- Concerns or allegations, which fall within the scope of specific procedures, e.g child protection and safeguarding or discrimination issues, will normally be referred

for consideration under those procedures. In the case of child protection the relevant local authority child protection team will be contacted.
- Where there is any financial impropriety, the concern should be referred to the Directors, before taking any other action.
- Ensure that matters of a criminal nature are reported to the Police.
- Whether the disciplinary or other relevant management policies, procedures and processes of the school need to be applied.
- Appointment of an officer to carry out the investigation under these procedures.

Investigation

Depending on the nature of concerns, investigations may be carried out under the business's disciplinary policy.

Investigation timescales

Within 14 days of a report being received, the person who is dealing with

the concern raised will respond in writing:

- Acknowledging that the concern has been received
- Supplying information on staff support mechanisms, and
- Advising whether further investigations or action is required and, if not, why not.

A further update will also be provided 28 days after the report was received, advising of additional progress made and the estimated date a final response will be available.

If the whistle blower has chosen to remain anonymous and non-contactable, they need to contact their original whistle blowing route in order to receive updates.

Investigation process

The impartial investigating manager appointed to undertake the investigation will establish the facts of the matter and assess whether the concern has foundation and can be resolved internally. Other people may need to be interviewed to provide further information and/or clarification concerning the issue(s) raised.

It is essential that written records of all interviews be kept throughout the investigation, together with written details of any action taken. The investigation will result in a written

report and recommendations for corrective action which will be passed to the manager responsible for deciding whether formal action should be taken.

Where any meeting is arranged involving an individual member of staff, which can be off-site, a recognised Trade Union representative or a work colleague may also attend. The agency will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, if a member of staff is required to give evidence in criminal or disciplinary proceedings, the agency will arrange for them to receive appropriate procedural and/or legal advice.

A member of staff raising a concern will be, subject to legal constraints, advised in writing of the outcome of the investigation and, where appropriate, what action is being taken.

Monitoring arrangements

The Directors have overall responsibility for the maintenance and operation of this policy.

The Directors will ensure that the whistle blowing procedures are defined, documented, widely circulated and reviewed at appropriate intervals.

The practical aspects of monitoring are to assess whether:

- The policy is being used appropriately
- Concerns are being handled and investigated properly
- There are any discernible patterns of concern across the business
- The policy has been effective in identifying and deterring malpractice, and
- More needs to be done to raise awareness of the policy.

This policy should be read in accordance with the Child Protection and Safeguarding policy and Staff Code of Conduct.

Last reviewed 02/02/26 by Sarah Marvin

Next review November 2027