

Whistleblowing Policy

| Field | Description |
|-------------------|---|
| Document title | Whistleblowing Policy |
| Version | V22.0 |
| Author | Head of Centre |
| Date issued | 20/03/2025 |
| Status | Approved |
| Approved by | Trustees |
| Review date | 20/03/2026 |
| Document location | Document Control SharePoint - Subcontractor |

1. Introduction

1.1 The purpose of this Whistleblowing Policy is to encourage and enable people to raise concerns about any unethical, illegal, or inappropriate conduct within Step into Learning, without fear of retaliation.

2. Scope

2.1 This policy applies to all employees, contractors, vendors, and stakeholders of Step into Learning.

3. Definition

3.1 Whistleblowing refers to the act of reporting concerns or suspicions of unethical, illegal, or inappropriate conduct within the organisation, including but not limited to fraud, bribery, corruption, harassment, discrimination, safety violations, financial misconduct, and malpractice.

4. Policy Statement

4.1 Staff might be unsure whether it is appropriate to raise their concern under this policy and procedure or whether it is a personal grievance, which is more appropriate to raise

under Step into Learning's grievance procedure. A whistleblowing concern is about a risk, malpractice or wrongdoing that affects others. It could be something which affects learners, the public, other staff or Step into Learning. A grievance, on the other hand, is a personal complaint about an individual's own employment situation. For example, a staff member may feel aggrieved if they think a management decision has affected them unfairly or that they are not being treated properly. A whistleblowing concern is where an individual raises information as a witness whereas a grievance is where the individual is a complainant.

4.2 Employees who wish to report a concern or suspicion of misconduct should follow these steps:

- Verbally or in writing report the concern to their immediate line manager, if comfortable doing so.
- If the concern involves their line manager, or if they are uncomfortable reporting to them, employees should report verbally or in writing directly to executive director or board of trustees, who will oversee the whistleblowing process.
- Alternatively, you can make direct disclosures to the DfE/ESFA using this link <https://www.gov.uk/guidance/how-esfa-handles-whistleblowing-disclosures>
- If the disclosure relates to assessment malpractice the relevant Awarding Organisation's whistleblowing policy should be followed.

Confidentiality

4.3 All reports of misconduct will be treated with the utmost confidentiality to the extent possible, considering the need to investigate and address the reported concerns.

Non-retaliation

4.4 Step into Learning prohibits retaliation against any employee who, in good faith, reports concerns or suspicions of misconduct. Retaliation against whistleblowers is strictly prohibited and may result in disciplinary action, up to and including termination of employment.

Investigation and follow-up

4.5 All reports of misconduct will be investigated within 10 days by the executive director or board of trustees. Depending on the nature and severity of the reported concern, investigations may involve internal personnel, external consultants, or legal advice.

4.6 Following the investigation, appropriate corrective actions will be taken, and whistleblowers will be informed of the outcome to the extent possible.

False reports

4.7 Intentionally making false accusations or reports with malicious intent is a violation of this policy and may result in disciplinary action, up to and including termination of employment.

5. Resources

5.1 Protect <https://protect-advice.org.uk/> a whistleblowing charity that advises and supports individuals and organisations.

5.2 A link to support employees in whistleblowing from GOV.UK
<https://www.gov.uk/whistleblowing>

5.3 Review of the Whistle Blowing Framework

<https://www.gov.uk/government/publications/review-of-the-whistleblowing-framework/review-of-the-whistleblowing-framework-terms-of-reference>