

Whistleblowing Policy



INTRODUCTION

We always aim to conduct ourselves ethically, and with honesty and integrity. We expect the same high standards from all of our people – employees, workers, contractors, and agency workers.

However, we recognise that there may be occasions when we – or our people – do not get this right. In these instances, you may feel that you need to raise your genuine and serious concerns through this whistleblowing policy.

PURPOSE AND SCOPE

The aims of this policy are to:

- provide an effective way for you to raise serious concerns
- ensure that you receive feedback on any action undertaken by us as a result of you raising serious concerns
- ensure that you will be protected from reprisals or victimisation for having raised your concern in public interest
- signpost you to further options available to you if you are dissatisfied with our response, or if an internal investigation is not appropriate
- allow Step Ahead to take action against any employee who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so.

POLICY

'Whistleblowing' is a term used to refer to the internal or external disclosure of malpractice and illegal acts or omissions at work. It covers, for example, how we draw funds, safeguard children and young people, and report outcomes.

Protecting individuals using this policy

The Public Interest Disclosure Act 1998 provides protection for individuals who raise legitimate concerns about specified matters, called qualifying disclosures.

A qualifying disclosure is made by an individual who has a reasonable belief that the information disclosed is true and concerns a matter in the public interest.

Qualifying disclosures may relate to:

- a criminal offence (including fraudulent and corrupt behaviour, eg theft, fraud or malpractice)
- a miscarriage of justice
- an act creating risk to health and safety, including safeguarding
- an act causing damage to the environment

Whistleblowing Policy



- a breach of any other legal obligation, or
- concealment of any of the above.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed. You do, however, need to hold a reasonable belief of such an action having been, being or likely to be carried out.

If you make such a protected disclosure, you have the right not to be dismissed, subjected to any other detriment, or victimised. This is the case even were it to materialise that you were genuinely mistaken. We will not tolerate any individual being subjected to a detrimental treatment.

Malicious disclosures

If it is found that you have maliciously raised a matter which you know to be untrue or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, your behaviour may be addressed through the appropriate Step Ahead policy.

Non-whistleblowing concerns

This policy is only to be used in the exceptional circumstances as outlined in above. There are a number of Step Ahead policies that will be relevant in other circumstances.

This list includes but is not limited to:

- safeguarding
- bullying and harassment
- disciplinary
- grievance

Raising a concern

You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly.

You can make your disclosure orally but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure, you should:

- provide any relevant context and background, including relevant dates, venues, names etc
- state clearly the reason why the situation causes for concern.

You must say that you are raising your concern using the whistleblowing policy and whether you wish your identity to be kept confidential. While we will make every effort to deal with your case confidentially, depending on the circumstances of the case this may not always be possible. Where this is the case, you will be informed of this and the reasons why it was not possible.

Whistleblowing Policy



Who should I raise it with?

1. **Line Manager** – In most cases, you should first raise your concern with your line manager.
2. **Manager’s Manager** – If it would be inappropriate to speak with your line manager (for example, if they may be involved in the alleged malpractice, wrongdoing, or illegal acts), raise the concern with their manager.
3. **Chief Executive** – If it would also be inappropriate to approach the manager’s manager, raise the matter directly with the Chief Executive.
4. **Director** – If the concern involves the Chief Executive, you should contact a Director of the company. The Director may, if appropriate, arrange for the concern to be investigated **externally and independently of Step Ahead**, and for any necessary follow-up action to be taken.

Anonymous disclosures

We will consider anonymous disclosures, but we do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

If you wish to make an anonymous disclosure, you can do so using the Empowered “Suggestion Box”, which will maintain your anonymity and is a direct line to the Chief Executive.

What happens after I raise a concern?

Your disclosure will always be acknowledged within three working days.

It will be investigated by the Step Ahead manager or senior officer to whom you raise your concern.

They will arrange to meet you as soon as possible, away from the workplace if necessary, to enable you to explain your concern, as outlined, above.

As per the above, we may not always be able to keep your details confidential but we will always let you know if it is not possible to do so.

You will be told either at the meeting or as soon as possible afterwards, what action will be taken to address the concern you have raised. Where action is not taken, you will be informed and given an explanation. The action taken in response to a disclosure will depend on the nature of the concern.

Typically, the matters raised may result in one or more of the following:

- no action required
- action being taken under other Step Ahead policy or procedure
- an internal investigation under this policy

Whistleblowing Policy



- a referral to the police or relevant statutory body

Any Step Ahead manager or senior leader receiving a potential whistleblowing concern must notify the Chief Executive immediately that a concern has been raised and inform them of progress in resolving the concern.

Timeline: Updates on investigation progress will be provided at reasonable intervals, and you will be informed of the outcome as soon as reasonably possible.

Raising a concern externally

We strongly encourage you to exhaust the internal processes set out above in the first instances.

In exceptional or urgent circumstances, however, or where, having made a disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies.

Making a disclosure to the press

Disclosures to the press will not be considered reasonable and may constitute misconduct. As such, the matter might be treated as a disciplinary matter in accordance with our disciplinary and grievance policy and procedure.

Further help and assistance

If you are unsure about what to do at any stage in the procedure and would like independent advice, you can contact Protect, the UK whistleblowing charity formerly known as *Public Concern at Work*. Protect offers confidential, free legal and practical advice on raising concerns about malpractice at work and can explain what legal protections may be available to you.

You can contact Protect via their Advice Line online form on their website: <https://protect-advice.org.uk/contact-protect-advice-line/>, or by calling their Advice Line on 020 3117 2520.

RESPONSIBILITIES

This policy applies to all Step Ahead staff, including employees, volunteers, agency workers, offshore and subcontractors working outside the UK or remotely.

Offshore or remote staff are encouraged to raise concerns through Step Ahead's internal reporting channels, including line managers, senior managers, or the Chief Executive, as appropriate.

- All offshore staff raising concerns are entitled to:
- Confidential treatment of the information raised, within the limits of legal obligations;

Whistleblowing Policy




- Protection from retaliation or victimisation for raising a concern in good faith;
- Feedback on any action taken, where appropriate and legally permissible.

Reporting notes for offshore staff:

- If your line manager or their manager is involved in the concern, you should escalate directly to the Chief Executive or a designated senior officer.
- Managers handling offshore disclosures must ensure investigations comply with this policy while respecting local legal requirements and take steps to minimise risk to the whistleblower's identity.
- Where disclosure to external authorities (e.g., regulators or law enforcement) is necessary due to the seriousness of the issue, staff will be informed where possible.

RELATED POLICIES AND DOCUMENTS

- Equality, Diversity and Inclusion Policy
- Grievance Procedure
- Disciplinary Procedure
- Prevent Policy
- Modern Slavery Policy
- Anti-Fraud, Bribery and Corruption Policy

Document Control	
Document Title: Whistleblowing Policy	
Version Number: 1.3	Document Owner: Corporate Support
Date Approved: 29 May 2025	Approved By: Jackie Bedford, CEO
Effective Date: 29 May 2025	
Superseded Version: 1.1	
Date of Last Review: 09 April 2026	Date of Next Review: 1 July 2027