

WHISTLEBLOWING POLICY

<i>Policy Title</i>	<i>Whistleblowing Policy</i>
<i>Prepared By</i>	<i>Shamaila Nawaz</i>
<i>Approved By</i>	<i>Inderjot Singh</i>
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⇒ *Statement of Intent*

Small Steps make a moral commitment to provide learning in a safe, secure, and diverse environment with equality of opportunity for all. By adopting and implementing a whistle-blowing policy, Small Steps will ensure all staff the opportunity to report any concerns in an open and transparent manner. Small Steps is fully committed to the highest possible standards of openness. In line with that commitment, we expect individuals, who have serious concerns about any aspect of our work, to come forward and voice those concerns. Whether it's a child's safeguarding concern, or an act of a fellow staff member, event or anything to come forward and speak to their direct line manager (supervisor in their respective School's branch; GEMS Founder's school, Al Barsha, Mizhar, Dubai South) who can then raise concern to the program director. (Ms. Veronica, BCBA)

⇒ *Aim of the policy*

This policy aims to:

- Provide avenues for individuals to raise concerns in confidence and receive feedback on any action taken.
- Ensure that individuals receive a response to your concerns and that they are aware of how to pursue them if they are not satisfied.
- Reassure individuals that they will be protected from possible reprisals or victimisation, if they have a reasonable belief that they have made a disclosure in good faith.
- This policy applies to all employees, learners, employers, and anyone who is appointed into Small Steps in a professional capacity.

⇒ *What is Whistleblowing?*

Whistleblowing encourages and enables individuals to raise serious concerns within Small Steps rather than overlooking and problem or blowing the whistle externally.

Employees are often the first to realise that there is something wrong within the organisation. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to Small Steps.

⇒ *Type of concern*

This policy should not be confused with the Grievance Procedure. This policy relates to complaints about your own employment or training, or professional practices that Small Steps operate within.

These complaints could include, but are not limited to:

- Sexual or physical abuse of employee, learner, or an employer.
- Taking money from fellow colleagues in Small Steps or member of GEMS School's staff.
- Having any sexual or personal relationship with School staff members
- Discrimination towards a member or employee, Small Steps learner, or an employer.
- Health and safety risks, including risks to the school members as well as other employees, Small Steps learner or employers.
- Possible fraud and/or corruption, scamming schemes, theft.
- Other unethical conduct.



⇒ *Reporting Concern*

As a first step, you should raise concerns either verbally or in writing with your immediate line manager (supervisor in your branch). This may depend, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the concern is very serious, you can contact directly to the program director (Ms. Veronica, BCBA).



⇒ *Safeguard and Victimisation*

Small Steps recognises that the decision to report a concern can be a difficult one to make. If what is said is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you provide a service.



⇒ *Confidentiality*

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you need to come forward as a witness.

This policy encourages you to put your name to your concern whenever possible. Please

note that:

- Individuals must disclose the information in good faith.
- Individuals must believe it to be substantially true.
- Individuals must not act maliciously or make false allegations.
- Individuals must not seek any personal gain.

Breach of Policy



We will take seriously any breaches of this policy by employees of Small Steps. Any such instances will be investigated and where appropriate will be considered under the relevant disciplinary policy for learners or employees. With regard to any breach of the policy by employers, we will take appropriate action in relation to the nature of the incident.