



WHISTLEBLOWING POLICY

2026 – 2027

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1. Statement of Intent

At Small Steps Learning Difficulties Center, we are committed to fostering a safe, inclusive, and transparent work environment. We hold ourselves to the highest ethical and professional standards, and we expect all individuals associated with our center to act with integrity, responsibility, and in the best interest of the children and community we serve.

The purpose of this Whistleblowing Policy is to provide a safe and structured mechanism for staff and stakeholders to raise serious concerns regarding unethical, illegal, or improper conduct. These concerns may relate to safeguarding, misconduct, malpractice, or any form of wrongdoing observed in the course of their duties.

We encourage individuals to speak up—whether it is regarding a safeguarding matter, misconduct by a colleague, or an event that compromises our standards—without fear of retaliation. Concerns should be initially reported to the immediate supervisor or line manager at the relevant school branch. If the issue is of a serious nature, it should be escalated directly to the Program Director, Ms. Veronica Micalizio.

2. Purpose of the Policy

This policy is designed to:

- Provide a clear framework for individuals to raise concerns in a confidential and secure manner.
- Ensure that concerns are taken seriously and addressed through an appropriate process.
- Provide assurance to individuals that they will be protected from retaliation, victimisation, or disciplinary action when raising concerns in good faith.
- Promote a culture of accountability, transparency, and open communication across all areas of operation.

This policy applies to all employees, therapists, volunteers, learners, contractors, and any individuals engaged with Small Steps in a professional capacity.

3. What is Whistleblowing?

Whistleblowing is the act of reporting concerns about wrongdoing, misconduct, or breaches of professional or ethical standards within an organisation. It enables individuals to raise concerns internally rather than remaining silent or reporting externally without proper context.

Employees and stakeholders are often best placed to identify signs of malpractice. However, they may hesitate to report concerns out of fear of reprisal or a misplaced sense of loyalty. This policy is intended to provide reassurance and support for those who wish to raise legitimate concerns in good faith.

4. Types of Concerns Covered

This policy applies to concerns that may not fall under the usual grievance or complaints procedures. These may include, but are not limited to:

- Safeguarding violations or abuse of children, staff, or stakeholders.
- Sexual harassment or inappropriate personal relationships in a professional setting.
- Discrimination based on race, gender, religion, disability, or other protected characteristics.
- Health and safety risks to staff, learners, or school community members.
- Fraud, bribery, corruption, scamming, or theft.
- Misuse of funds or unethical financial practices.
- Breach of professional codes of conduct or ethical standards.
- Any deliberate attempt to conceal wrongdoing or misconduct.

5. Reporting a Concern

In the first instance, concerns should be raised with your direct line manager or supervisor at your respective school branch. If the concern is of a sensitive or serious nature, or if the individual feels uncomfortable reporting to their supervisor, they may escalate the matter directly to the Program Director – Ms. Veronica Micalizio.

Concerns involving a senior leader: A concern must not be reported to, or investigated by, an individual who is the subject of the concern or who may have a conflict of interest. If the concern involves the direct supervisor or line manager, it should be reported to the Programme Director. If it involves the Programme Director, it should be reported directly to the Small Steps CEO or another authorised senior leader who is not implicated. If it involves the Small Steps CEO, a school CEO or Principal, or another senior leader, the reporter must bypass the usual management chain and report the matter to an appropriate independent person or body, such as the relevant governing body, human resources or compliance lead, or regulatory authority. Safeguarding concerns must also be reported immediately to an appropriate Designated Safeguarding Lead who is not implicated. Where the school Designated Safeguarding Lead is involved, the concern must be escalated to the Deputy Designated Safeguarding Lead, Principal or CEO, or the relevant corporate safeguarding lead, provided that person is not implicated.

Concerns can be raised verbally or in writing and should include as much detail as possible, including dates, individuals involved, and the nature of the concern.

Safeguarding concerns must be reported immediately. A reporter must not delay making a report while attempting to gather further evidence, establish proof, investigate the matter themselves, or follow the usual management chain. Any concern about the safety or welfare of a child or vulnerable person must be escalated without delay through the applicable safeguarding procedures, including notification to the Small Steps Designated Safeguarding Lead or Deputy Designated Safeguarding Lead and the relevant school Designated Safeguarding Lead.

6. Protection Against Victimisation

Small Steps is committed to ensuring that individuals who raise concerns in good faith are protected from any form of retaliation, victimisation, or unfair treatment. Anyone who harasses or discriminates against a whistleblower will be subject to disciplinary action.

7. Confidentiality

All whistleblowing disclosures will be treated confidentially, so far as reasonably practicable and subject to safeguarding, legal, regulatory, and investigative requirements. Every reasonable effort will be made to protect the identity of the individual raising the concern. However, disclosure may be necessary in certain circumstances, including safeguarding enquiries, legal proceedings, or where information must be shared with relevant authorities or those responsible for investigating the concern. Where appropriate and legally permissible, the individual will be informed before their identity is disclosed.

- We encourage whistleblowers to identify themselves to enable thorough follow-up, but anonymous disclosures will also be considered where sufficient evidence is provided.

To ensure protection under this policy, individuals must:

- Raise concerns in good faith.
- Believe the information disclosed to be true and substantial.
- Avoid making malicious or false allegations.
- Not seek personal benefit or gain from the disclosure.

8. Breach of Policy

Small Steps will investigate any breaches of this policy. If a staff member is found to have acted inappropriately or violated ethical or professional standards, disciplinary action may be taken in accordance with our staff code of conduct.

In the event an employee, volunteer, or learner is found in breach, appropriate action will be taken depending on the nature and severity of the incident.

9. Declaration and Compliance

All staff and professionals affiliated with Small Steps are required to read, understand, and comply with the Whistleblowing Policy and all related policies. This ensures the continued safety and ethical operation of our center and our work with vulnerable children.

By complying with this policy, individuals affirm their commitment to:

- Maintaining ethical conduct while working with vulnerable children.
- Supporting a transparent and inclusive work environment.
- Cooperating fully with investigations and reporting procedures.

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