

## Gateway Whistleblowing Policy

Whistleblowing is the common term used when an employee reports suspected wrongdoing in connection with their work. Gateway is committed to the highest standards of transparency, integrity, and accountability and it is the responsibility of all staff members and those associated with the Company to raise concerns so that improvements can be made. Serious allegations can be raised following the whistle blowing policy. If you believe that the Company or any of its directors or employees are engaged in wrongdoing as specified below, and that disclosure is in the public interest (i.e. that it concerns a matter which is of public concern), you should report your concerns following the procedure below.

If you are concerned about a matter, the disclosure of which would not be in the public interest, you should consider instead following the Grievance Procedure.

The following types of wrongdoing are covered under this procedure, but not limited to:

- endangering the health and safety of an individual
- damaging the environment
- a criminal offence
- a failure to comply with a legal obligation
- concealing wrongdoing relating to the above matters.
- Abuse of authority
- Sexual, physical, or verbal abuse, or bullying or intimidation of employees, customers or service users.

### Reporting

Gateway recognises that the decision to make an allegation can be a difficult one to make. However, whistle-blowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to those for whom Gateway is providing a service. Gateway will take appropriate action to protect a whistle-blower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

### Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistle-blower's identity unless requested by the whistle-blower. Gateway will not, without the whistle-blower's consent, disclose the identity of a whistle-blower to anyone other than a person involved in the investigation/allegation. Sometimes the whistle-blower might be asked to give a statement as part of the investigation, in which case their identity may have to be revealed.

### Anonymous allegations

This policy encourages whistle-blowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the *Head of Operations in consultation with HR*. In exercising discretion to accept an anonymous allegation the following factors need to be considered:

- The seriousness of the issue raised
- The credibility of the allegation; and

- Whether the allegation can realistically be investigated from factors or sources other than the complainant

### **Untrue allegations**

No disciplinary or other action will be taken against a whistle-blower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistle-blower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

### **Procedure for making an allegation**

It is preferable for allegations to be made to an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the whistle-blower believes that their line manager is involved in wrongdoing, it would be inappropriate to raise it directly with them. In this instance you may raise your concern with other members of management or the Company's proprietor Henry Qu. Management, or the Company proprietor will investigate any concerns raised in good faith and will notify you of the outcome (although specific details may not be shared).

If you are not satisfied, having followed the procedure above, or if you reasonably believe there is no one in management unconnected with the wrongdoing, you may raise your concerns with the official organisation or body responsible for policing the area of concern (e.g. the Police, the Environment Agency, the Health and Safety Executive, etc.).

Please Note: You may only do this if the internal process has been exhausted.

### **Allegation**

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

### **Action on receipt of an allegation**

The line manager or proprietor will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation:
- The acknowledgement of the allegation;
- Any documents supplied by the whistle-blower

The investigator will ask the whistle-blower for their preferred means of communication and contact details and use these for all communications with the whistle-blower to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Proprietor will be informed within 5 working days of receipt of the allegation. The Proprietor will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence, it will immediately be reported to the Proprietor and a decision will be made as to whether to inform the Police or appropriate authorities.

## Timetable

An acknowledgement of the allegation in writing within 10 working days with

- An indication of how Gateway propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial enquiries have been made
- Information on whistle-blower support mechanisms
- Indication whether further investigations will take place and if not, why not.

Where the allegation has been made internally and anonymously, we will be unable to communicate what action has been taken.

## Support

Gateway will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistle-blower is required to give evidence in criminal or disciplinary proceedings we will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

*Gateway* accepts that whistle-blowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation where possible.

## Responsibility for the procedure

The Head of Operations and company Proprietor have overall responsibility for the operation of this procedure and for determining the administrative processes to be followed and the format of the records to be kept.

## Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Head of Operations and Company Proprietor.

Further information and advice can be found here: <https://www.gov.uk/whistleblowing>

## Contact details

Katie Cross  
Head of Operations  
Email: [katie@gateway-education.com](mailto:katie@gateway-education.com)

Henry Qu  
Proprietor  
Email: [Henry@gateway-education.com](mailto:Henry@gateway-education.com)