

NUDGE EDUCATION

Nudge Education Whistleblowing Policy

December 2025

Review Date: December 2026

Scope of Document:

Introduction

Whistleblowing is relevant to all organisations and all people. This is because every business and every public body faces the risk of things going wrong internally. Where such a risk arises, usually the first people to realise or suspect the wrongdoing will be those who work in or with the organisation.

Nudge Education has a positive commitment and open approach to whistleblowing. This policy is in line with the Public Interest Disclosure Act 1998 (PIDA) and provides protection for whistleblowing on wrongdoing. Employees are encouraged to raise concerns with us in the first instance, rather than ignoring the issue or disclosing it externally.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work (Now Protect: <https://protect-advice.org.uk/>)

2. Aim

The aim of the policy is:

- To encourage you to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide you with guidance as to how to raise those concerns.
- To reassure you that you will be protected from dismissal, harassment, intimidation or other types of detrimental treatment as a result of disclosing your concerns, even if they turn out to be mistaken.

3. Scope

This policy covers all individuals working across the Nudge Education Group of all levels and grades, including senior managers, directors, employees including part-time and fixed-term, contractors, secondees and agency personnel (collectively referred to as “our people” in this policy).

4. What is Whistleblowing?

Whistleblowing is the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice or wrongdoing. This may include:

- criminal activity;
- endangering the health and safety of any person;
- damage to the environment;
- failure to comply with any legal obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- miscarriages of justice;
- breach of internal policies and procedures, including the Code of Conduct;
- conduct likely to damage the company's reputation;
- unauthorised disclosure of confidential information;
- deliberate concealment of any of the above matters.

A *whistleblower* is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the company's activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure.

If you are uncertain whether something is within the scope of this policy you should seek advice from Marcos Rojo, Director of Operations whose contact details are contained in this policy.

5. Raising a whistleblowing concern

How should I raise a concern?

You should raise a concern following the whistleblowing procedure set out in this policy and it is best to do so in writing, although concerns can be raised verbally.

You should set out the background and history of the concern, giving names, dates and places where possible, and the reasons for your concern. You will need to demonstrate that there are reasonable grounds for your concerns, but you are not expected to prove the truth of your allegation.

If there are two or more of you who have had the same concerns you should each raise these concerns separately. You should, as far as possible, avoid discussing the matter together as this may affect the fairness of any subsequent investigation.

Who should I raise a concern with?

There are five ways in which you can raise a concern, as follows:

1. Contact your immediate **manager**.

This depends on the sensitivity of the issue and who is suspected of malpractice. Please make it clear that you are raising your concern as part of the Whistleblowing Policy.

2. Email the **whistleblowing email address**.

If the concern involves your immediate manager, Head of Department or Director, or for any reason you would prefer not to tell them, you may raise the matter directly by emailing:
Whistleblow@nudgeeducation.co.uk.

3. Contact **Protect**.

Safecall is independent, confidential and anonymous, and is available for employees to raise any concerns they may have, relating to employees issues (ranging from bullying to Health & Safety) as well as any concerns they may have as regards any impropriety. Safecall reports can be made by calling **020 3117 2520** or [Protect Advice Line](#)

4. Contact the **Director of Operations**.

If the concern involves your immediate manager, Head of Department or Director, or for any reason you would prefer not to tell them, you may raise the matter directly by emailing the Director of Operations -
brian.mair@nudgeeducation.co.uk

5. If your whistleblowing concern involves one of the children or stakeholders are are working with:

As per our safeguarding and child protection policy you may contact any of the above people or speak to the NSPCC Whistleblowing service using the guidance at:

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

When should I raise my concern?

The earlier you express your concern, the easier it is for action to be taken. Please raise concerns at the earliest opportunity.

Who will investigate my concern?

Following receipt of a concern, a relevant panel will be convened by the Director of Operations and will appoint an Investigations Lead who is independent from the matter and has the relevant experience and seniority to lead an investigation.

What takes place during an investigation?

To consider your disclosure fully it is likely that one or more fact-finding meetings will take place. If we need you to attend these meetings you may be permitted to be accompanied by:

- a fellow employee of your choice who may be a friend or colleague
- a full-time officer employed by a trade union.

You will be able to confer with that person during the course of the meeting and they may address the meeting but may not answer questions on your behalf. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter. If the meeting needs to take place online because of time or geographical considerations, the meeting will be recorded and a transcript taken.

Those under investigation may also be accompanied by a fellow employee of their choice who may be a friend or colleague, or a full-time officer employed by a trade union. We will not ask you to attend a meeting where those under investigation are also present.

Please note that members of our HR/People team cannot accompany you or those under investigation to any meetings.

The Investigation Officer may be accompanied by any Nudge Education employee to help with the investigation.

The Investigation Officer will conduct a full investigation to establish whether wrongdoing has occurred. The format of the investigation may vary depending upon the circumstances and the Investigation Officer will aim to give you an indication of how they propose to deal with the matter.

How long will the process take?

You will be provided with an estimate of how long the investigation is likely to take.

6. Confidentiality and safeguards

We will treat all concerns in the strictest confidence and your identity will not be revealed. However, you must be aware that during the investigation, a statement from you may be needed as part of the evidence gathering process.

We do not encourage people to make disclosures anonymously, because proper investigation may be more difficult or impossible where we cannot obtain further information from you.

If you make an allegation but it is not confirmed by the investigation, no action will be taken against you. But if you make an allegation maliciously, frivolously or for personal gain, we may take disciplinary action under the Disciplinary Policy.

If you believe that you are suffering a detriment for having raised a concern, you should report this to the person you raised your original concern with.

Action will be taken against those who subject an individual to detriment because they have raised a concern.

We recognise that the decision to report a concern can be a difficult one to make. We will not tolerate any harassment or intimidation (including informal pressures) of any person making a disclosure and will take appropriate action to protect you.

This does not mean that if you are already the subject of disciplinary or redundancy procedures, those procedures will be halted as a result of the disclosure.

7. Where can I get independent advice

If you feel you need independent advice at any stage of the process, you may contact the independent charity –Protect (formerly Public Concern at Work) (<https://protect-advice.org.uk/>) on 020 3117 2520, or email at the enquiry page <https://protect-advice.org.uk/contact-protect-advice-line/>

Protect gives free and confidential advice on whistleblowing matters, but remember not to disclose any confidential information relating to the whistleblowing concern and to Nudge Education.

8. Roles and responsibilities

All Nudge Education people (including contractors, secondees, agency employees, external consultants) must:

- be aware of this policy;
- when making any disclosure, tell us if you have a direct personal interest in the matter.

Managers must:

- make their employees aware of this policy and procedures;
- encourage a positive open working culture for staff and others working at Nudge Education to express easily their concerns;
- take concerns seriously; and
- refer concerns raised to them under this Whistleblowing Policy to the relevant person via any of the methods stated in Section 5 of this policy and within 5 working days.

Head of Whistleblowing Process (currently Director of Operations) must:

- acknowledge the whistleblower's disclosure;
- where appropriate keep the whistleblower regularly informed of progress;
- take concerns seriously, considering them fully and fairly;
- to the appropriate extent communicate the findings to you, the individual(s) under investigation and, if appropriate, members of Nudge Education management or other external authorities;
- keep a confidential log to assess effectiveness of policy and any emerging trends.

Abuse of this policy

We will treat any disclosure made with malicious or frivolous intent as a serious disciplinary offence and we will deal with this under our Disciplinary Policy.

9. What happens next?

What sort of a response can I expect from Nudge Education?

First and foremost, if you tell us about a concern about wrongdoing, you will be treated fairly and justly by Nudge Education and we will take any matter seriously. We will take all reasonable steps to ensure that no person under our control victimises or retaliates against you.

What happens if I am implicated?

If you blow the whistle and actively cooperate with an investigation in which you may be implicated in any wrongdoing, you are likely to receive a lighter sanction than might otherwise have been the case (unless the misconduct is so serious that no amount of cooperation or other mitigating conduct can justify a decision not to bring any action).

What happens after the investigation?

The Director of Operations will ensure, to the appropriate extent that the findings of the investigation are communicated to:

- you, as the person raising the wrongdoing concern;
- the individual(s) under investigation; and if appropriate;
- members of Nudge Education management or other external authorities who may need to consider whether action should be taken on the basis of the findings.

Right of Appeal

If you are not satisfied with the outcome of the investigation you may appeal in writing to the Chair of Nudge Education stating the grounds for your appeal. You must make your appeal within ten working days of receiving details of the outcome of the investigation.

The Chair of Nudge Education will consider all the information presented, including the Investigating Officer's report to the Committee, the procedures that were followed, and the reasons given by the Investigation Officer for his or her recommendations. The Chair of Nudge Education will then decide either:

- to ratify the recommendations made by the Investigating Officer; or
- decide that a new investigation be undertaken by a different investigating officer.

In the latter case, a new investigation will be initiated and the alternate Investigating Officer will submit a written report to the Chair of Nudge Education, who will determine what action we should take.

You will be informed of the outcome of the appeal in writing, including the reasons. Where the outcome of the appeal is that no further action is to be taken you may raise your concern with an external body such as those listed above.

10. Non-conformance

Any breach or non-conformance will be investigated thoroughly in accordance with Nudge Education's Disciplinary Policy and the individual may be subject to disciplinary action which, depending on the severity of the issue, could lead to dismissal from the company.

Version	Date	Details of Change(s)	Approved By
1.1	5/12/2025	Implementation of 1.1 policy	Brian Mair