

Coast Tuition – Whistleblowing Policy

August 2025

Date	Version	Edit and Agreed	Staff
2020	1	Y	HE, LK
2021	2	Y	HE, LK
2022	3	Y	HE, LK
2023	4	Y	HE, LK
2024	5	Y	HE, LK
2025	6	Y	HE, LK

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1.0 Introduction

It is important to the business that any fraud, misconduct or wrongdoing by employees or officers of Coast Tuition is reported and properly dealt with. Coast Tuition therefore encourages you to raise any concerns that you may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which you may raise any concerns that you have and how those concerns will be dealt with.



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2.0 Background

The law provides protection for anyone who raises legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by anyone who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. It is not your responsibility for investigating the matter - it is our responsibility to ensure that an investigation takes place.

Anyone who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

We encourage you to raise any concerns you may have under this procedure in the first instance. If you are not sure whether or not to raise a concern, you should discuss the issue with your line manager or person responsible for Human Resources.

3.0 Principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. You should be watchful for illegal or unethical conduct and report anything of that nature that you become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to you.

No one will be victimised for raising a matter under this procedure. This means that your continued employment and opportunities for future promotion or training will not be prejudiced because you have raised a legitimate concern.

Victimisation for raising a qualified disclosure will be a disciplinary offence. If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.

Maliciously making a false allegation is a disciplinary offence.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to a director or person responsible for Human Resources.

This procedure is for disclosures about matters other than a breach of your own contract of employment. If you are concerned that your own contract has been, or is likely to be, broken, you should use the organisation's grievance procedure.

4.0 Procedure

We reserve the right for third parties to be involved at any stage of the process.

Stage 1

In the first instance, you should approach your line manager with any concerns. If you reasonably believe your line manager to be involved or you do not feel comfortable in speaking to your line manager regarding the issues, you should proceed straight to stage 3.

Stage 2

Your line manager will arrange an investigation into the matter (either by investigating the matter personally or immediately passing the issue to someone in a more senior position). The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be considered, and you will be asked to comment on any additional evidence obtained.

The relevant manager will then report to the board, which will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency, if required.

If disciplinary action is required, the relevant manager will report the matter to the person responsible for Human Resources and start the disciplinary procedure.

On conclusion of any investigation, you will be told the outcome of the investigation and what the board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

Stage 3

If you are concerned that your line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the board, you should inform a director of Coast Tuition, who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report to the board as in stage 2 above.

If for any other reason you do not wish to approach your line manager you should also in the first instance contact a director. Any approach to the director will be treated with the strictest confidence and your identity will not be disclosed without prior consent.

Stage 4

If on conclusion of stages 1, 2 and 3, you reasonably believe that the appropriate action has not been taken, you should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made.

These include:

- HM Revenue & Customs;
- the Financial Conduct Authority;
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.



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