



# Whistleblowing Policy

**Date:**

12<sup>th</sup> December 2025

**Review date:**

12<sup>th</sup> December 2026

**Approved by:**

Rob Grays – Chief Executive Officer

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## Introduction

The Public Interest Disclosure Act 1998 recognised that workers have the right to “blow the whistle” and disclose certain information, e.g. fraudulent activities, malpractice and/or concerns about health and safety.

Prospero Group are committed to maintaining the highest standards of integrity, transparency, and accountability in all our operations. We recognise the importance of creating an environment where Clients, Internal Employees, Service Users and Temporary Workers feel empowered to raise concerns about misconduct, unethical behaviour, or breaches of policy without fear of retaliation.

This policy is designed to protect individuals who raise concerns in good faith and to enable Prospero Group to address issues promptly and appropriately. By fostering a culture of openness and accountability, we aim to uphold the values that define Prospero Group and ensure the trust and confidence of our Clients, Internal Employees, Service Users and Temporary Workers.

## Purpose

The purpose of this policy is to:

- Provide clear guidance on how individuals can raise concerns.
- Provide a clear and safe process for individuals to report concerns about unethical, illegal, or unsafe practices.
- Safeguard individuals from retaliation or discrimination when they raise concerns in good faith.
- Comply with legal and regulatory obligations.

## Scope

This policy applies to:

- Prospero Group employees – including permanent, temporary and contracted staff.
- Prospero Group Temporary Workers.
- Any third parties acting on behalf of Prospero Group.
- Any individual or entity associated with Prospero Group, regardless of location.

## Definitions

**Adult at Risk** – any person aged 18 years and over, who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.

**Child or Children** - any person under the age of 18.

**Client** – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and Private Sector organisations.

**Internal Employee** – is defined to mean a full or part-time employee of Prospero Group.

**Prospero Group** – is comprised of three entities: Prospero Teaching, Prospero Health & Social and Prospero Integrated.

**Service User** – is defined to mean **Child, Children or Adult at Risk**.

**Temporary Worker** – an individual receiving Work-Finding Services, delivered by Prospero Group. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.

**Work-Finding Services** – taken to mean recruitment activity, advertising of roles and provision of work-related training, provided by Prospero Group.

## **When to Raise a Concern**

Individuals are encouraged to report any concerns relating to:

- Breaches of policy or procedures.
- Illegal, unethical, or fraudulent activities.
- Health and safety risks.
- Harassment, bullying, or discrimination.

## **Raising Concerns Anonymously**

It is advisable to provide your name when making an allegation, as concerns raised anonymously are often harder, and in some cases impossible, to investigate. However, anonymous allegations will still be considered and investigated at Prospero's discretion.

When making this decision, the following factors will be considered:

- The seriousness of the issues raised.
- The credibility of the concern.
- The possibility of corroborating the allegation with identifiable sources.

Anonymous concerns should be to Prospero's [HR team](#) (Internal Employees) or [safeguarding team](#) (Temporary Worker's and Clients).

While anonymity is respected, providing a way to follow up can help address your concern more effectively.

## **Raising Concerns Internally (Non-Anonymous)**

Individuals who wish to raise concerns openly can:

- Speak directly with their Branch Consultant/Manager or one of Prospero Group's Designated Safeguarding Officers.
- Submit a written report to the HR team.
- Request a confidential meeting with one of Prospero Group's Designated Safeguarding Officers.

## **Raising Concerns Externally (Non-Anonymous)**

Individuals who wish to raise concerns externally should follow the procedures set by the external body or regulator.

These may include completing an online form, submitting a written report, or making a phone call.

Common external bodies include:

- Regulators: For example, the Financial Conduct Authority (FCA) for financial misconduct or the Health and Safety Executive (HSE) for safety concerns.
- Public Concern at Work (PCaW): A whistleblowing charity offering advice and guidance.
- The Police: For concerns involving criminal activity.

## **Support and Guidance**

Individuals can seek advice or clarification on this process by contacting Head of Compliance & Safeguarding.

This procedure ensures that all individuals feel secure in raising concerns, enabling the Prospero Group to maintain the highest standards of professionalism and integrity.

## **Consequences**

Prospero Group will not take action against anyone who raises a complaint under these policies in good faith because they did so, however, individuals who make false allegations maliciously may be subject to the appropriate disciplinary action or termination of their Work-Finding Services. This Whistleblowing Policy does not cover private grievances, including complaints about individual employment matters. A 'whistleblower' is a witness, not a complainant.

Failure to adhere to this policy may result in termination of the of the Internal Employee's employment / Temporary Worker's Work-Finding Services and referral to the Disclosure and Barring Service / relevant professional body, if applicable.

## **Data Protection**

Prospero Group will treat all data confidentially and in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulations 2018.

## **Enforcement**

This policy will be enforced by Prospero Group's CEO, Managing Director, Operations Directors, Head of Compliance & Safeguarding, Head of HR and Data Protection Officer.