

Whistleblowing Policy 2023/2024



**Great Leaps Adventure
Whistleblowing Policy**

1.0 Introduction

- 1.1 Great Leaps Adventure CIC (GLACIC) is committed to tackling unlawful acts including fraud, corruption, unethical conduct, potential safeguarding issues and malpractice regardless of who commits them, or where in the organisation they are committed. In this way the organisation ensures that its services are used in the best interests of the pupils and the local community.
- 1.2 GLACIC aims to ensure that anyone wishing to raise a concern feels confident in the process under this Policy. This policy is designed to allow you to raise a concern without fear of reprisals or victimisation, if your disclosure is made in good faith.
- 1.3 To encourage and enable you to do this GLACIC will ensure that anyone who uses this policy to raise a concern will be protected from any form of detriment, harassment or victimisation regardless of:
 - The content of the concern you raise
 - With whom you raise the concern and
 - Whatever the outcome of raising the concern.
- 1.4 The Whistleblowing Policy provides an opportunity for your concern to be dealt with internally, after all that is where the solutions will be found, or through an agreed external body.
- 1.5 There is always a temptation to take a concern directly to the media, but this does not necessarily mean that the issues raised are appropriately addressed and often fails to protect innocent parties. You should remember that you have a duty of confidence to your employer and that unauthorised disclosure of information maybe a disciplinary offence. Please refer to paragraph 15 below.
- 1.6 Employees who wish to raise a Whistleblowing complaint should in the first instance raise the complaint with the Managing Director, Safeguarding Lead, DSL (in the case of safeguarding issues).
- 1.7 If the employee does not consider that their complaint has been dealt with appropriately by the Managing Director, Safeguarding Lead they may elect to escalate their whistleblowing complaint to the LA's Director of Children's Services.
- 1.8 GLACIC will take all possible steps to safeguard our children and to ensure that the adults in our organisation are safe to work with children. We will always ensure that the procedures outlined in *Medway Safeguarding Children's Board Protocol: Managing Allegations of abuse Against Persons who work with Children and the LADO* and Part 4 of [Keeping Children Safe in Education, DfE 2020](#) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The LADO can be contacted on 01634 331065

1.8 Further information on safeguarding concerns and whistleblowing advice can be found in the Statutory Guidance [Keeping Children Safe in Education 2020](#)

2.0 Scope

2.1 This policy applies to all staff and volunteers working for GLACIC.

3.0 What is covered by Whistleblowing?

3.1 A concern can relate to any unethical or unprofessional conduct within GLACIC, including malpractice, safeguarding concerns and abuse.

The policy not only covers acts that have actually occurred but also potentially unethical or unprofessional conduct.

3.2 The person making the disclosure must do so in the reasonable belief that it shows one or more of the following:

- A criminal offence has been committed, is being committed, or is likely to be committed;
- There is a potential safeguarding issue;
- A person has failed, is failing, or is likely to fail to comply with any legal obligation to which she/he is subject;
- A miscarriage of justice has occurred, is occurring, or is likely to occur;
- Acts or potential acts of fraud and corruption or the misuse of public funds
- The health & safety of any individual (employee or member of the public) has been, is being, or is likely to be endangered;
- The environment has been, is being or is likely to be damaged
- Actual or potential acts of all forms of discrimination;
- the actual or possible abuse (sexual or physical) of pupils or vulnerable adults
- Actual or potential acts of harassment or bullying of, or by, someone working for the organisation,
- Any unethical conduct that causes concern or brings the reputation of the organisation into disrepute or,
- The deliberate concealment of information that would indicate any of the above.

- 3.3 If you are in any doubt as to whether or not to raise a concern then confidential advice can be sought from your local authority, DSL, HR contact, or from your trade union representative.
- 3.4 Note: - If, when disclosing a concern you commit a criminal offence, for example accepting a bribe and or acts of corruption, you may lose your rights to protection from detriment.

4.0 Who Is Covered By the Whistleblowing Procedure?

- 4.1 The Public Interest Disclosure Act 1998 protects workers who disclose information in the correct manner from dismissal or penalisation. “Workers” include individuals who are;
- Employees employed under a contract of employment;
 - Employed under any other contract, under which they perform personally any work or services;
 - Agency workers; or
 - Individuals undertaking work experience as part of a training course.

5.0 How am I Protected?

- 5.1 Under the Public Interest Disclosure Act, to qualify for protection for disclosure, the worker must:
- Be acting in good faith;
 - Have reasonable grounds for believing that the information disclosed indicates the existence of one of the problems itemised in section 2 above

6.0 Confidentiality

- 6.1 GLACIC accepts that wherever possible the confidentiality of anyone wishing to raise a concern will be protected. There might however be occasions where your confidentiality cannot be protected, for example, where there is the involvement of the police.
- 6.2 If there is any possibility that your confidentiality cannot be protected you will be told of the reasons and offered appropriate advice and support.

7.0 Raising a concern

7.1 You are encouraged to raise a concern provided that:

- You have reasonable belief that the information you hold, or the allegation you are making is accurate; and
- You make the disclosure in good faith
- Under no circumstances should you investigate your concern yourself.

8.0 Anonymously raised concerns

8.1 Concerns expressed anonymously will be investigated on the basis of their merits. However, an investigation may be hampered by the inability to gain further information and the organisation would encourage you to provide some method of contacting you to assist in the investigation.

9.0 Misuse of the whistleblowing policy

9.1 Raising a concern with malicious intent or for personal gain or the gain of others is not acceptable and may lead to disciplinary action under GLA's Disciplinary Policy.

10.0 Who can concerns be raised about?

10.1 You can raise a concern about the practice of anyone who undertakes work for, or on behalf of, the organisation or Local Authority, including:

- Employees of the organisation
- Organisation Directors
- Employees of the Local Authority;
- Contractors;
- Volunteers;

10.2 In this organisation you will normally be encouraged to raise a concern with your direct line manager, or in the case of a safeguarding concern, the organisation's DSL. If this was inappropriate then your Safeguarding Lead should be contacted.

11.0 How to raise a concern

- 11.1 No matter with whom you raise your concern it will be dealt with under this procedure.
- 11.2 If the person with whom you raise the concern feels it necessary they may want to refer your concern on to either a specialist team or a more senior officer, whichever is appropriate. If this is the case you will be contacted first and have the opportunity to discuss any issues this may raise.

12.0 First Point of Contact

- 12.1 A concern would normally be raised initially with your line manager or supervisor. However this may not always be possible, dependent on the nature of the concern and who is involved.
- 12.2 Alternatively, if you feel unable to raise the matter with your line manager or company Director you may write to the Local Authority's Director of Children's Services.

13.0 What to consider when expressing a concern

- 13.1 To enable your concerns to be dealt with in a proper and effective manner here are some guidelines for you to consider:-
- Be as clear as possible about what the concern is and to whom and what it relates. You may also want to discuss the concern with others to see if it is shared.
 - Be as clear as possible about who maybe involved, when and where actions may have taken place. Please ensure the facts are recorded i.e. record the dates and times in a diary. This way you can be clear about what has actually been heard or seen and when, rather than rely on memory or hearsay.
 - Ensure you ask for your concerns to be dealt with under this procedure.

14.0 The procedure to be followed

- 14.1 To ensure that all concerns raised are taken seriously and are fully investigated GLACIC has agreed a procedure to be followed in all cases.
- 14.2 If, at any stage of the procedure, you are asked or wish to meet with someone addressing the concerns you have raised you have the option to be accompanied by a workplace colleague, trade union representative or representative from a professional body.

14.3 However you wish to express your concern, by telephone or in person, you will:

- Receive an acknowledgement of your concerns normally within five working days of notifying the investigating person whom you have expressed the concern (this can be sent to your home address);
- The investigating person will then decide how to progress your concern. This may mean undertaking an investigation. This does not mean that the concern is either true or untrue but will help to assess the gravity of the complaint and establish the facts. It could be possible that concerns raised may be the result of a misunderstanding or an authorised change in practice.

14.4 Normally within ten working days of making your concerns known you will either:-

- Have a confidential meeting with the investigating person to further discuss your concerns or
- Have received, in writing, an outline of how the investigating person intends to deal with the concerns raised.

14.5 Dependent on the nature of the concerns you may have subsequent meetings with the relevant investigating person. These can be held “off-site” if preferred.

15.0 The outcome of your concern

15.1 Having raised the concern, GLACIC recognises that you will need to be assured that the issues have been dealt with correctly. You will be kept informed on a regular basis of what actions are being taken and the final results of any investigations.

15.2 In some situations, such as referrals to external bodies, it may not be appropriate (or legally possible) to supply you with the full information discovered. However the reasons for this will be explained at that time.

16.0 Taking your concern further

16.1 If you have exhausted all these channels and you still have concerns or feel that the issues have not been fully or appropriately addressed, you can contact the Director of Children’s Services at the Local Authority or have him/her contacted on your behalf, to discuss your concern in confidence.

16.2 However you should not refer the matter outside the organisation without first ensuring that all other possible avenues have been exhausted.

17.0 Contacting the media

- 17.1 If a worker is considering contacting the press, they are strongly advised to seek guidance from professional or other representative bodies and to discuss the matter where possible with line and professional managers. If you decide to proceed with contacting the media, you must inform the Safeguarding Lead/Board of Directors of the action you have taken or are proposing to take.
- 17.2 Disclosures to the media can be made under the law, and will be protected if the following circumstances are met:
- The disclosure is made in good faith
 - The employee reasonably believes the information and any allegations are substantially true
 - The employee does not act for personal gain
- 17.3 Additionally, one or more of the following conditions must be met:
- The worker reasonably believes they would be subjected to a detriment if disclosure were made to the employer or prescribed person
 - In the absence of an appropriate prescribed person, the worker reasonably believes a disclosure to their employer would result in the destruction or concealment of information about the wrongdoing
 - The worker has previously disclosed substantially the same information to their employer
 - It must be reasonable to make the disclosure
- 17.4 Please be aware that premature contact with the media, where none of the conditions above are met, may result in disciplinary action under the company's Disciplinary Policy.