Whistleblowing Policy

Policy Statement

Graduately Developing Futures (GDF) believes as an organisation that to support our key values of security, integrity and trust we must encourage an open and honest culture. It is important therefore that all employees, contractors, students and learner participants feel that they can highlight, where they have reasonable grounds for doing so, fraudulent, criminal or dangerous activities within GDF, without the fear of prejudice or victimisation. This policy sets out a procedure by which such issues can be raised in accordance with The Public Interest Disclosure Act 1998.

Scope of the Policy

GDF already has a number of policies in place to deal with employee complaints such as the grievance procedure. This policy is intended to cover concerns which are in the public interest and may be investigated separately.

The policy is applicable to all employees inclusive of temporary staff, casual staff, volunteers, consultants and contractors. All employees are encouraged to use this procedure if they have reasonable belief (a "Genuine Concern") that one of the following acts has occurred, is occurring or is likely to occur:

- A criminal offence
- A breach of legal obligations
- A miscarriage of justice
- Danger to Health & Safety or the environment; or
- Where there has been deliberate concealment of information tending to show one of the above.

Only genuine concerns should be reported. Disclosures must be made in good faith with a reasonable belief that the information and any allegation in it is substantially true, and that the disclosure is not made primarily or solely for personal gain. Malicious or false allegations will be treated as a serious disciplinary offence.

The provisions of this policy, if complied with and specifically in regard to malpractice, override any duty of confidentiality in your contract of employment.

Designated Officer

The HR Director is the Designated Officer under this policy, and should be kept informed of any complaints brought in relation to the policy.

Statutory Protection

The Public Interest Disclosure Act gives legal protection to employees again being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns provided that they are disclosed under procedures identified in the Act.

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Procedure for raising 'Genuine Concerns'
When raising a Genuine Concern you should be in a position to provide the following information, where possible:

- the background and history
- names, dates and places where appropriate
- the reason why you are particularly concerned about the situation.

The matter should be raised initially with your line manager. If you feel unable to speak to him/her, or the complaint relates to his/her actions, the matter should be raised with the HR Director (the "Designated Officer"), who will refer it to the Managing Director and/or Board where appropriate.

The investigation will be conducted as speedily and sensitively as possible. An official written record will be kept at each stage of the procedure. You are entitled to be accompanied by a work colleague throughout the procedure when reporting your concerns.

Procedure
If appropriate, an initial interview will be arranged with you within 7 days of receipt of your complaint to ascertain your area/s of concern. This interview will remain confidential if requested. The notes taken during the interview will be sent to you to approve as an accurate record of what was discussed.

You will be asked whether you want your identity to be disclosed and will be reassured about protection from possible victimisation or possible reprisals. You will be asked if you are prepared to make a verbal or written statement (if you have not already done so).

Your manager, the Managing Director, or a Member of the Board (where appropriate), will then conduct further investigations. They will aim to complete the investigation within 7 working days although in serious or complicated cases, this may not be possible.

The person against whom the disclosure is made will normally be told at an early stage, provided with the evidence supporting it, and be allowed to respond. However, it may be necessary to conduct the investigation in confidence (i.e. without informing the subject of your allegation/s) until (or if) it becomes necessary to do so. Alternatively, depending on the nature and seriousness of the complaint, the person/s against whom the allegation/s are made may be suspended while investigations are ongoing.
If it is not possible to comply with the time scales set out above, you will be informed and given a revised timescale.

If there is a case to answer, and if appropriate, the disciplinary procedure will be initiated against the person/s who are the subject of the allegation/s.

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You will be given feedback with regard to outcome of the investigation within 5 working days of completion of the investigation (including any disciplinary investigation). The exact nature of any disciplinary action taken against any person will remain confidential.

Whether there was a case to answer or not, and provided that your disclosure was made in good faith because you reasonably believed it to be true, you will protected from reprisal or victimisation as a result of your complaint.

Further Action
GDF recognises that workers have a right to make a disclosure about certain matters of concern relating to the matters set out above to prescribed persons (such as the Health and Safety Executive, the Director General of Fair Trading, the Director of the Serious Fraud Office, the utility regulators, the Data Protection Registrar and the Environment Agency). If you are unhappy with the results of the internal investigation and wish to take the matter further, please ask the HR Director for further details.

Queries
If you have any questions about this policy, please ask your line manager or the HR Director. You may also like to contact Public Concern at Work, an independent body that seeks to ensure that concerns about malpractice are properly raised and addressed in the workplace, for confidential advice and information.

Review
This policy will be reviewed on an annual basis as a minimum. Next review date 01.09.2027

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