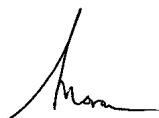




GP Strategies (UK) Ltd

Policies and Procedures
Whistleblowing Policy

Policy no:	GP-UK-C-03
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Effective date:	01.08.22
Prepared by:	Sharron Symon
Authorised by:	Shay Moran

Signed by: 
Shay Moran, Senior Vice President

Date: 01.08.22

Whistleblowing Policy

1. Aim

- 1.1 The aim of this Policy is to encourage colleagues who have concerns about any aspect of GP to come forward and voice those concerns. This responsibility extends to reporting any suspicions in relation to the actions of staff, learners and third parties. Third parties in this context include (amongst others) all consultants, suppliers and customers.
- 1.2 Staff and learners are often the first to realise that there may be something wrong within the learning environment. Raising your concerns is viewed by GP as a positive action that may make a valuable contribution to our business. We are committed to reaching the highest possible standards of service by placing the protection of children, young people and adults at risk at the heart of everything we do.
- 1.3 We are committed to creating a work and learning environment where we treat everyone as individuals, fairly, equally and in a consistent way. Respecting one another at all times.
- 1.4 This Policy explains:
 - How you can raise a concern.
 - How you will be protected from victimisation and harassment.
 - What will happen once a concern is raised.

2. Raising a Concern

- 2.1 We want staff and learners, who may be aware of wrongdoing which affects another person or service, to raise their concerns at the earliest possible opportunity so that they can be properly investigated.
- 2.2 If your concern relates to your own treatment at work which includes bullying by a colleague, you should raise this with your Manager. Concerns relating to employment can normally be dealt with informally by your Manager. However, if your concerns involve your Manager, it should be raised with another manager. Most concerns can normally be resolved quickly and informally through discussion. If your concern is not able to be resolved by talking to your manager or a senior manager, you can use the Grievance Policy.
- 2.3 If a learner we support has a concern about the support provided for them, this should be raised as a complaint, through our complaints process (Complaints Policy: GPSTL-100-OP-28)
- 2.4 If your concern relates to a safeguarding or welfare concern which affects another person including learners you should raise this with your DSL and follow the process outlines in the Safeguarding and Prevent Policy Annex 7

3. How to Raise a Concern

- 3.1 How to raise a concern will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing.
- 3.2 It is important to have an open and honest relationship with your manager. This means that your manager is the person you should speak to first – unless you think it is their fault. If you cannot speak to your manager or another manager, you can also speak to the Senior Vice President.
- 3.3 If you need to raise your concern in complete confidence, you can contact our Raising Concerns Helpline on +44 (0)121 281 2700 or email info@gpstrategies.com
- 3.4 The earlier you raise a concern, the easier it is to take action. You need to provide the following information:
 - The nature of your concern and you believe it is true;
 - The background and history of your concern including dates and names of people involved.
- 3.5 You do not have to be able to prove the concerns raised, but you will need to demonstrate that you have a genuine belief relating to suspected wrongdoing or malpractice and that there are reasonable grounds for your concern.

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- 3.6 We want you to feel safe and able to speak up and raise concerns at any early stage. Rather than wait for proof, we would prefer you raise the matter as soon as it becomes a concern. If in doubt, speak out!
- 3.7 You may invite a colleague or a trade union representative to accompany you to any formal meeting in connection with the concerns you have raised.

4. Supporting You

- 4.1 We are committed to support any employee or learner who raises a concern. We recognise this decision may be difficult to make. If you honestly and reasonably believe what you are saying is true, you have nothing to fear, you are doing the right thing.
- 4.2 We will not tolerate any harassment or victimisation of an employee or learner who raises a concern and we will take the appropriate action to support you when you raise a concern in good faith and will treat this as a serious disciplinary matter.
- 4.3 Once it is raised, we will investigate and take action as necessary and come back to you within 20 days in writing.

5. Confidentiality

- 5.1 All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish.
- 5.2 We encourage you to put your name to the concerns raised wherever possible. If you do not tell us it is difficult for us to protect your position and give feedback. Anonymous concerns are much less powerful and possibly more difficult to investigate. However, if you do decide to raise a concern anonymously, please do consider a method of communication where we can obtain further information if required.
- 5.3 If you raise a concern in good faith but it is not confirmed on investigation, you have nothing to fear. However, if it is proven that you raised the concern maliciously, to cause disruption, to seek revenge or for personal gain, appropriate measures could be taken resulting in disciplinary action.
- 5.4 All staff shall familiarise themselves with the requirements and provisions of Corporate Policy with regards to Conduct of Business GP-UK- C- 02 and Code of Ethics GP-UK-C-04.
- 5.5 Where action to resolve the concern is considered inappropriate or impractical or where the concern following investigation is considered to have no foundation, the member of staff shall be given a thorough explanation in writing within twenty days.
- 5.6 You must treat any information communicated in connection with this policy as confidential whether the concern has been raised anonymously or not.

6. Investigating Your Concern

- 6.1 We will respond to your concerns as quickly as possible. We may have to test your concerns but this is not the same as accepting or rejecting them. All parties shall be informed of the proposed action within a further ten days.
- 6.2 Our overriding principal is to be fair to all employees, including those who are wrongly or mistakenly accused. Initial enquiries will be made to decide whether an investigation is appropriate, and if so, what form it will take.
- 6.3 The investigation may need to be carried out under terms of strict confidentiality, this could mean not informing the subject of the complaint until (or if) it becomes necessary to do so.
- 6.4 We hope that most concerns raised will be dealt informally by your manager. However, where a formal investigation is required, we will advise you as far as possible of the action to be taken.
- 6.5 The amount of contact between you and the investigating individual will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information. It is likely you will be interviewed to ensure that your concerns are fully understood.

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- 6.6 You need to be assured that your concerns have been properly addressed. Unless there are legal reasons why this cannot be done, you will be kept informed of the progress and provided with an outline of its findings and any action plan.
- 6.7 An employee who has exhausted all the procedures above shall have the right to disclose the matter to the relevant statutory bodies including the Police. Management shall not discourage staff from doing so.

7. Monitoring and Review

- 7.1 This policy shall be reviewed annually for improvements as part of our quality assurance requirements.

8. Associated Policies and Documentation

Safeguarding Policy
Safeguarding annex 7
Safeguarding Code of Conduct
Grievance Policy
Disciplinary Policy
eSafety Policy
(Drug, Alcohol & Substance Misuse)
Complaints Policy
GP-UK-SF-12 Confidentiality Agreement
GP-UK-SF-62 Acknowledgement to Comply with Company Policies
Company Handbook

Reference Procedures
GP-UK-C-02 Conduct of Business
GP-UK-C-04 Code of Ethics