



**Gloucestershire Initial Teacher Education Partnership**

## **Whistleblowing Policy**

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## Whistleblowing Policy

Definition: GITEP staff refers to the Course Director, Course Administrator, Finance Manager, Lead Mentors and Subject Leads.

GITEP is committed to the highest standards of openness, honesty, probity and accountability. In line with that commitment, we encourage our staff and trainees who have serious concerns about any aspect of the SCITT's work, to come forward and voice those concerns, without judgement, reprisal or harassment.

As a member of GITEP staff, a trainee, or partnership member, you may be the first to realise that there may be something seriously wrong within the organisation. However, you may not express your concerns because you feel that speaking up would be disloyal to colleagues or the organisation. You may also fear harassment or victimisation and think it may be easier to ignore the concern rather than report it.

GITEP recognises that there may be certain cases will have to proceed on a confidential basis. This policy makes it clear that GITEP staff, trainees, and partners can do so without fear of reprisals. This Whistleblowing Policy is intended to enable GITEP staff, trainees, and partners to raise serious concerns rather than overlooking a problem or discussing it externally.

### Purpose of the policy

The purpose of this is policy is to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected
- Let all GITEP staff, trainees, and partners know how to raise concerns about potential wrongdoing in or by the partnership
- Set clear procedures for how the GITEP will respond to such concerns
- Let all GITEP staff, trainees, and partners know the protection available to them if they raise a whistle-blowing concern
- Assure GITEP staff, trainees, and partners that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)



## Definition of whistleblowing

Whistle-blowing covers concerns reported regarding wrongdoing that is “in the public interest”. Examples of whistle-blowing include (but aren’t limited to):

- Criminal offences, such as fraud or corruption
- Pupils’ or staffs’ health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistleblower is a person who raises a genuine concern relating to the above.

Not all concerns about GITEP, or the partnership, count as whistleblowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistle-blowing. If something affects a member of GITEP staff, a trainee, or partner as an individual, or relates to an individual employment contract, this is likely a grievance. When staff have a concern, they should consider whether it would be better to follow our grievance or complaints procedures.

Protect (formerly Public Concern at Work) has:

Further guidance on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure: <https://protect-advice.org.uk/what-is-whistleblowing/>

A free and confidential advice line: <https://protect-advice.org.uk/advice-line/>

## Legislation

This policy has been written in line with government guidance on whistle-blowing. We also take into account the Public Interest Disclosure Act 1998.

## When to apply the policy

If the concern relates to an incident within a trainee’s placement school then they should follow the procedure of the whistleblowing policy of that school. If it relates to a concern regarding the work of the SCITT then follow this policy. If you are unsure ask your Professional Lead or the Course Director.



## Safeguards

### **Protecting the whistleblower**

Under the Public Interest Disclosure Act 1998 a whistleblower is protected from detriment and unfair dismissal. GITEP will support and not discriminate against concerned staff or trainees who apply the whistleblowing procedure, provided any claim is made in good faith, even if they turn out to be mistaken.

### **Protection from reprisal**

GITEP recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. GITEP will not tolerate harassment or victimisation and will take action to protect anyone raising a concern which they have reasonable belief to be true and to be in the public interest. This will include disciplinary action against those that subject an individual to detriment as a result of the whistleblowing.

This does not necessarily mean that if an individual is already the subject of procedures such as disciplinary, improving performance, grievance or managing attendance, that those procedures will be halted as a result of their whistleblowing.

Where feasible, the individual who has reported their concern will be contacted when the concern has been investigated to ascertain whether they have suffered any detriment as a result of their whistleblowing. If at any time, either during or after the investigation, they feel that they have suffered any detriment as a result of their whistleblowing they should contact their line-manager, Course Director, Partnership Board or their union. Everything possible will be done to manage employment/training relationships following a genuine and reasonable concern being raised.

### **Confidentiality**

GITEP treats the details of all whistleblowers in confidence and will not intentionally divulge their identify without their consent. However, it must be appreciated that the investigation process may reveal the source of the information without us revealing their identity directly, and in some circumstances a statement by a whistleblower may be required as part of the evidence.

### **Anonymous allegations**

Allegations can be made anonymously. However, this policy encourages whistleblowers to put their name to their allegation, as concerns expressed anonymously are often much more difficult to investigate. An example may include the need to contact the whistleblower to obtain further information or verify the details already provided.



Anonymous allegations will be considered wherever possible at the discretion of the GITEP leadership team. The factors to be taken into account when determining whether an investigation in such a case can proceed would include:

- the seriousness of the issues raised;
- if the allegations pertain to other policies and therefore should be dealt with in accordance with alternative procedures, for example allegations management and child protection;
- the credibility of the concern; and
- the likelihood of confirming the allegation from other, attributable sources.

### **Untrue allegations**

If an allegation is made in the public interest and which the whistleblower had a reason to believe was true, but it is not confirmed by the investigation, no action will be taken against them. If, however, malicious or vexatious allegations are made which the whistleblower could not have reasonably believed was true, appropriate action may be taken against them including disciplinary action.

### **When to use whistleblowing procedures**

If a member of GITEP staff, a trainee, or partner has concerns about wrongdoing at GITEP and feels that those concerns are sufficiently serious to require reporting, this procedure outlines what should be done. Each individual GITEP staff member, trainee, or partner should feel able to speak freely on such matters. However, GITEP staff and colleagues have the right to protect themselves against unfounded false or malicious accusations.

Whistleblowing should only be used when the party implementing the procedure (Representor) has reasonable grounds for believing that a serious offence has been or may be committed. It must never be used without good grounds, falsely or maliciously.

Whistleblowing is not appropriate for dealing with issues between a member of staff or trainee and the SCITT which relate to their own employment/training or rights of employment/training conditions generally. Whistleblowing is not appropriate to specific cases of child safety or safeguarding which will be dealt with under the procedures specified in the Safeguarding Policy.

### **Procedure for raising a concern**

#### **Who to report to**

Concerns should be raised with the Course Director or the Chair of the Partnership Board if the concern is about the Course Director.

## **How to make the report**

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Details of any personal interest in the matter should be included.

## **Procedure for responding to a concern**

### **Investigating the concern**

When a concern is received by the Course Director or the Chair of the Partnership Board - referred to from here as the 'recipient' - they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
  - The recipient should then arrange a further investigation into the matter, which may involve the Course Director or the Chair of the Partnership Board if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In others, they may need to report the matter to the police
  - The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps

### **Outcome of the investigation**

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred.



The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police. They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.

Beyond the immediate actions, Course Director or the Chair of the Partnership Board and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing. Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

### Malicious or Vexations Allegations

GITEP staff, trainees, and partners are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the person who raised the concern. If, however, an allegation is shown to be deliberately invented or malicious, GITEP will consider whether any disciplinary action is appropriate against the person making the allegation.

### Links to other policies

- Complaints Policy
- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- Safeguarding Policy
- Staffing Policy
- Trainee Support Policy

### Document history

Review Date	Significant Amendments	Made by	Approved by	Approval Date	Next review
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