



GTG Whistleblowing Policy

1. Introduction

GTG is committed to the exposure and eradication of any fraud, corruption, or malpractice. In support of this aim, GTG will support and protect anyone who makes a genuine public interest disclosure relating to the conduct of affairs at GTG.

Employees are often the first to know when something is going seriously wrong, be it a serious danger to the public or a major fraud. Ignoring wrongdoing or having an aversion to reporting malpractice may mean that the alarm is not sounded on serious irregularities, the consequence being that those in authority do not get to know about them in time to act to limit any damage. Whistleblowing policies aim to ensure that wrongdoing in the workplace can be brought to attention and addressed, swiftly.

GTG is committed to ensuring that leaders and managers are open to whistle-blowing concerns, that prompt an appropriate response is taken when concerns are made known, that whistle-blowers will be supported and protected from fear of reprisal and that confidentiality is respected but will make clear the terms of what can and cannot remain confidential.

An effective whistleblowing policy will:

- avoid crisis management and public criticism.
- deter serious malpractice.
- ensure staff play their part and feel valued.
- promote accountability throughout the organisation.
- promote openness.
- promote trust from stakeholders.

2. Application of the policy

The Policy applies:

- to all members of GTG i.e. staff, apprentices, delegates, and members of the governance Board. Members of the public may also have concerns and this policy has been produced to help members of the public to contact GTG with their concerns.
- to situations where allegations of “malpractice” raised about an individual, or individuals, in relation to their work at GTG, whether made by or about a member of staff, student, governors, or someone who provides or has provided goods and services to GTG.

The term “malpractice” might include:

- financial malpractice, fraud, or corruption.
- failure to comply with legal obligations or GTG Charter or statutes.
- danger to health and safety.
- criminal activity.
- academic malpractice.
- Nepotism.
- improper unethical behaviour.
- person being discriminated against under the Equality Act 2010.
- attempts to conceal any of the above.

What is not covered?

This should not be used to deal with serious or sensitive matters covered by other policies or procedures e.g. it is important for all concerned to distinguish between whistle blowing and grievance. Whistleblowing is a public, or wider organisational interest disclosure and potential whistle-blowers should seek advice from a senior staff member, depending on the circumstances to determine whether the issue is a grievance or a matter for whistleblowing.

This policy cannot be used to raise issues already settled through other procedures.



3. Protecting you

If an individual raises a concern that they believe is true GTG will take appropriate action under the Public Interest Disclosure Act 1998 (updated April 2020) to protect the individual from any harassment, victimisation or bullying by informing the Discloser of their right to raise any concerns to the Designated GTG representative.

GTG will respect confidentiality if this is requested by the Discloser. In this case GTG will not reveal details of the name or position of the Discloser without permission or unless GTG is obliged by law to disclose. GTG will explain this at the time that the concern is raised.

Any documentation (including electronic) relating to the matter will be kept secure. Where the Discloser involves a Trade Union Representative or work colleague in this procedure, the Discloser will be under an obligation to use reasonable endeavours to ensure that they and their representative or work colleague keeps the matter strictly confidential, as permitted under this procedure, as required by law or until such time as it comes into the public domain.

Failure to comply with the obligation to keep the matter confidential by any member of staff may lead to disciplinary action.

Any allegation will not be influenced by any unrelated disciplinary action against the Discloser or any pending redundancies that may affect the individual.

Anonymous Allegations

Since GTG is committed to protecting the Discloser, individuals should be encouraged to provide their name at the time of making the disclosure. Concerns raised anonymously tend to be far less effective and if there is not enough information GTG may not be able to investigate the matter at all. If the Discloser feels that they cannot provide their name, then the Designated GTG representative will decide whether to consider the matter based on the seriousness of the matter and whether an investigation can be conducted based on the information provided.

Protection against Disciplinary Action.

No disciplinary action will be taken against a Discloser on the grounds of a disclosure in accordance with this procedure. This will not prevent GTG taking disciplinary action where it has been substantiated that a disclosure has been made:

- that is malicious or vexatious.
- where there has been a breach of commercial confidentiality
- where an external disclosure is made in breach of this procedure without reasonable grounds, or otherwise than to an appropriate public authority.

4. Raising a concern

If deemed appropriate, the discloser should raise their concerns internally in the first instance to allow those at GTG, in positions of responsibility and authority, the opportunity to rectify the situation and to explain the concern. The following contact details are available specifically to deal with such matters.

Write to:

Quality Department

GTG Training Ltd
1330 South Street
Glasgow
G14 0BJ

E-mail: help@GTG.co.uk

Tel: 0141 950 5600

GTG will advise the whistle-blower whether the concern comes within the scope of the policy. Where it does not, we will seek to advise the whistle-blower how the concern should be dealt with and if possible, under what procedure.

All matters will be treated in confidence and anonymity will be respected wherever possible. Any disclosure to GTG, under this procedure shall, wherever possible, be in writing but if this is not practicable, any such disclosure may be verbal, at the choice of the Discloser. The Discloser should provide as much supporting evidence, including a written statement of fact, as soon as possible about their concerns, and the grounds for the disclosure.

Although the discloser does not have to prove conclusively that an allegation is true, it should be evident that there is a good reason for concern.



5. RESPONDING TO CONCERNS

Initial Step

On receipt of the disclosure of a concern GTG will offer to meet the Discloser, in confidence, within 5 working days or immediately if there is any danger of loss of life or severe injury. The purpose of the meeting will be for GTG to obtain as much information as possible about the grounds for the Discloser's belief that malpractice has occurred or is likely to occur.

The Discloser may be accompanied by a Trade Union representative or a work colleague at the meeting. GTG personnel may be accompanied by an administrator to take notes; these notes will not identify the Discloser.

After considering the information obtained at the initial meeting GTG will, within 5 working days, or immediately if there is any perceived danger of loss of life or severe injury, provide the Discloser with a written summary/record of the information obtained at the meeting. The summary will include recommendations as to actions to be taken in response to the disclosure. The Discloser will then have 5 working days in which to confirm the written summary.

Once the written summary has been confirmed GTG will forward a copy of this to the Group Head of Quality.

The recommendations in the summary may include one or more of the following:

- that the matter should be investigated
- that the matter should be investigated internally using independent GTG Managers, or other investigators appointed by GTG.
- that a member of staff should be given the opportunity to seek redress through GTG's grievance, disciplinary, or other organisational policy.
- that the matter should be reported to the police and/or GTG solicitors
- No further action should be taken.

The grounds on which GTG could legitimately recommend no further action, may include:

- evidence is not forthcoming, or is not enough on balance of probabilities, to allege malpractice.
- that the Discloser is not acting in good faith.
- that the matter is already (or has been) the subject of proceedings under one of GTG's other procedures.
- That the matter concerned is already the subject of legal proceedings.

If the recipient of the summary decides not to act on any of the recommendations, that decision will be notified in writing to the GTG Director, giving full reasons for the decision.

Notification of Outcomes

- Once the GTG Director has decided what further action (if any) should be taken, GTG will inform the Discloser in writing, of the decision.
- If no further action is proposed, then GTG will provide a reason for this.
- If the outcome is the activation of the Disciplinary or Grievance procedure, then the confidentiality required under these procedures will be observed, which may mean that the Discloser is not informed of the specific outcome of those procedures. GTG will inform the Discloser that appropriate action has been taken without describing the detail.
- If the outcome is the activation of an investigation this should normally be completed within 20 working days of confirmation of the written record of the disclosure. As soon as it is available, a copy of the report of the investigation will be given to the discloser, and the person/persons against whom the concern is directed.
- Once the investigation report has been received, the following steps may be taken depending on the conclusions reached by GTG, and which members of staff or governors are the subject of concern:
 - A. When the concern is explained to the satisfaction of GTG, the discloser, and when the last two individuals are not in any way the subject of the concern, the investigation will be closed, and the report retained on file.
 - B. When the concern relates to a senior post holder and has been explained to the satisfaction of GTG, but not the discloser, the matter will be drawn to the attention of the GTG Director. In such circumstances the GTG



Director will interview the discloser and GTG investigator, to determine whether further investigation is needed. The discloser will be informed.

- C. Where the concern has been explained to the satisfaction of GTG, but not the discloser, and where the concern relates to the individuals (other than governors and senior post holders) the matter will be drawn to the attention of the GTG Director who will decide whether further action is needed. The discloser will be informed.
- D. Where GTG concludes that there is substance to the concerns expressed by the discloser, the matter will be referred to the GTG Director who will determine the form and scope of an official investigation. An official investigation may be undertaken by:
 - the police
 - Internal Audit
 - External Auditors
 - others as appropriate

Appeal

Disclosers who remain dissatisfied with the outcome will be informed of their right to take the matter to the relevant external bodies.

Further information

The charity PROTECT provides free confidential advice to workers who have concerns about wrongdoing in the workplace. The charity can be contacted by telephone on 020 7404 6609.



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