

Whistleblowing Policy



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1. Aims of the Policy

Goode Tutoring Ltd believes that as a company, we need to be transparent and accountable at all times. As such we believe that every employee, partner or user has the right to speak out in a safe and confidential manner if they believe that they have seen or experienced wrongdoing. With this in mind, this policy aims to achieve the following:

- Encourage individuals to be able to report suspected wrongdoings as soon as possible in the knowledge that their concerns will be taken seriously and be thoroughly investigated whilst having confidence that their confidentiality will be fully respected.
- Provides all staff members with full information of how to raise concerns regarding wrongdoing.
- Set out a clear procedure to show how Goode Tutoring will handle any such concerns.
- Make it clear to all staff that there are protections available to them if they raise a whistleblowing concern.
- Assure individuals that they will not be victimised for raising a legitimate concern even if they turn out to be mistaken (however, vexatious or malicious concerns, proven to be false, will be considered a disciplinary issue).

This policy does not form a part of any contract of employment and as such can be amended at any time, The policy applies to all staff at Goode Tutoring.

2. Definitions

Goode Tutoring refers to Goode Tutoring Ltd and any trading names derived thereof.

Staff refers to anyone working for or on behalf of Goode Tutoring in either a paid or voluntary capacity.

Users include anyone who accesses Goode Tutoring services.

Whistleblowing covers concerns made that report wrongdoing that would be considered to be “in the public interest”. Some examples of this include:

- Criminal offences such as fraud or corruption.
- Staff and user’s health and safety being put into danger.
- Failure to comply with legal obligations or statutory requirements.
- Poor financial management procedures.
- Damage to the environment.
- Attempts to cover up any of the above, or any other wrongdoing that would be of public interest.

Whistleblower defines the person who raises a genuine concern relating to the above definition.

It is important to clarify the difference between whistleblowing and grievance. Personal staff grievances such as bullying or harassment, whilst taken extremely seriously by Goode Tutoring,

would not constitute whistleblowing. Likewise, if something affects a member of staff or an individual, or relates to an individual employment contract, this also is most likely a grievance.

If a member of staff has a concern it is important for them to know whether whistleblowing or following our internal complaints procedure is more beneficial. In order to assist with this staff are encouraged to seek further advice.

Protect is a registered charity who can offer free confidential whistleblowing advice. Staff can call them on 020 3117 2520 or find out more information by visiting protect-advice.org.uk

3. Legislation

Whilst there is not a legal requirement to have a Whistleblowing Policy, Goode Tutoring believes in transparency and creating a safe environment for staff. This policy takes into consideration the [Public Interest Disclosure Act, 1998](#) and the protections that this gives to employees with concerns.

4. Procedure for Staff to Raise a Whistleblowing Concern

If a staff member has concerns firstly they should refer to the examples set out in section 2 under the definitions of Whistleblowing to establish if concerns are considered to be whistleblowing. Consider whether the concern involves an incident that was either an illegal act, a breach of statutory policies, an act that put people in danger or was a cover up activity. If in doubt, staff contact Protect for further support.

If a staff member does feel that the concern is of a whistleblowing nature, concerns should be raised to the directors. If the concern is about the directors, or if there's a feeling that they may be involved in the wrongdoing then staff would need to report concerns to the Department for Education who act as a prescribed person for educational institutions.

Concerns should be made in writing where possible. Concerns need to include:

- Names of those committing any wrongdoing.
- Dates.
- Locations.
- As much detail as possible, remaining factual and not opinion based.
- Staff should also mention personal interest in the matter.

5. Responding to a Whistleblowing Concern

Investigating the Concern

When a concern is received by the directors they will:

- Arrange a meeting with the person raising the concern - referred to from here as the complainant - at the earliest opportunity. The person raising the concern is entitled to be joined by a representative.

- During the meeting as much information as possible regarding the concern will be recorded. If at this point it is determined that the concern is not of a whistleblowing nature the directors will deal with the concern in line with the relevant policies and procedures.
- Directors are obliged to reiterate that the concern raiser is protected from any unfair treatment or risk of dismissal as a result of raising the concern. At this point directors are obliged to remind the complainant that if the concern is found to be malicious or vexatious, disciplinary action may be taken (see section 6 for more information).
- The director will establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - The director will arrange a further investigation into the matter involving all the directors. If appropriate and required they may look to bring in an external independent party to investigate. The director may also choose to report the matter to the police.
 - The complainant will be informed of how the matter is being investigated and an estimated timeframe for when they will be advised of the next steps.

Outcome of the Investigation

Once any investigation is completed, the investigating person will prepare a report detailing the findings and whether 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 police or local authority.

The complainant will be informed of the outcome of the investigation. Some details may need to be restricted due to confidentiality. Whilst we are unable to guarantee the outcomes, we will deal with all concerns fairly and appropriately.

Goode Tutoring will always review any investigation and ensure that our policies and procedures are kept under review to ensure that they remain robust and effective with preventing future occurrences of the same wrongdoing.

6. Malicious or Vexatious Allegations

Staff are encouraged to raise concerns. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented or malicious, Goode Tutoring will consider whether any disciplinary action is appropriate against the person making the allegation.

7. Escalating Concerns Beyond Goode Tutoring

Goode Tutoring encourages staff to raise concerns internally by reporting to the directors however, we do acknowledge that staff may wish to raise concerns externally. The prescribed body for this is the Department for Education on 0370 000 2288. Staff can also contact Protect for more advice on raising concerns to an external party.