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WHISTLEBLOWING POLICY

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Elite Mentors

Whistleblowing Policy

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INTRODUCTION

Elite Mentors is committed to maintaining the highest standards of integrity, transparency, and accountability. All cases of whistleblowing are treated seriously, and staff are encouraged to raise concerns about misconduct, malpractice, or risks within the organisation. Any reported concern will be **taken seriously, investigated thoroughly, and appropriate action will be taken.**

Whistleblowing refers to situations where a member of staff, worker, or volunteer raises concerns about wrongdoing, illegality, or risks that may affect the organisation, its members, or the public. This may include criminal activity, civil offences, threats to health and safety, safeguarding failures, breaches of data protection, or attempts to conceal any of these matters. Whistleblowing can be raised internally or externally with regulators or other relevant authorities.

This policy aligns with **‘Keeping Children Safe in Education’ (September 2024)**, which emphasises that all staff and volunteers should feel able to raise concerns about poor or unsafe practices, and that appropriate procedures must be in place to ensure concerns are handled effectively.

Aim and Scope of the Policy

The purpose of this policy is to:

- Encourage staff and others to raise concerns about conduct or practices that are potentially illegal, unsafe, unethical, or inconsistent with Elite Mentors' standards and policies.
- Provide **clear and accessible channels** for raising concerns.
- Ensure that individuals raising concerns **receive a response** and feedback on any action taken.
- Offer assurance that staff and others are **protected from reprisals or victimisation** under the **Public Interest Disclosure Act (PIDA) 1998**.

This policy applies to:

- All staff, including trainees and apprentices
- Workers not directly employed by Elite Mentors (e.g., agency, supply, or casual staff)
- Volunteers, contractors, suppliers, and partner organisations

Concerns that may be reported include, but are not limited to:

- Safeguarding of children and vulnerable adults
- Health and safety risks to pupils, staff, visitors, or the public
- Risks of individuals being drawn into terrorism (as defined by the Government's Prevent Strategy 2024)
- Unlawful acts, including theft or fraud
- Misuse or misappropriation of funds or resources
- Administrative failings or negligence
- Breaches of data protection and confidentiality
- Environmental damage
- Abuse of power or unethical conduct
- Deliberate concealment of any of the above

Matters Not Covered by This Policy

Concerns or complaints relating solely to **employment matters** that are not in the public interest, such as pay disputes, working conditions, or contractual issues, are **not covered by this policy**. These matters should be addressed through the appropriate **Elite Mentors policies and procedures**, such as the grievance or disciplinary policies, and raised with the **Head of Centre, Director, or relevant designated manager**.

Protecting the Whistleblower

- Elite Mentors follows **PIDA 1998**, providing legal protection for qualifying disclosures made in good faith.
- Whistleblowers are protected from **dismissal, harassment, or victimisation**, regardless of length of service.
- If victimised, staff can bring a claim to an **employment tribunal**, with compensation based on actual loss.
- Malicious, frivolous, or false reports may lead to **disciplinary action**.
- Protection applies to staff, trainees, volunteers, contractors, and casual or agency workers.

Key protections under PIDA include:

- Workers cannot be **victimised, dismissed, or penalised** for making a protected disclosure
- Protection applies **immediately**, with no minimum length of service required
- Whistleblowers who suffer retaliation can **bring a claim to an employment tribunal**; compensation awards are based on actual loss and are unlimited
- Only disclosures made **in the public interest** are protected
- “Workers” include staff, trainees, apprentices, volunteers, contractors, agency, and casual workers

Commitment by Management

Elite Mentors' management **will not tolerate harassment or victimisation** of whistleblowers acting in accordance with this policy and PIDA. Any individual found to have harassed or victimised a whistleblower will be subject to **disciplinary action**.

Malicious or Frivolous Disclosures

If a whistleblower raises concerns that are **malicious, deliberately false, or made for personal gain**, these will be treated seriously and may result in **disciplinary action** in line with Elite Mentors' disciplinary procedures.

Anonymity and Confidentiality

- All concerns raised will be treated **confidentially**, and every effort will be made to protect the identity of the whistleblower, unless disclosure is required by law.
- Staff are encouraged to **raise concerns openly**, as providing their details makes it easier to investigate and gather further information.
- Anonymous concerns may be considered at the discretion of the **Principal**, taking into account:
 - The **seriousness** of the issue
 - The **credibility** of the concern
 - The likelihood of **verifying the allegation** through other sources

Allegations Concerning Child Protection

- If a concern relates to **child protection**, the **Principal or Director** (or, if the concern involves the Principal, the **Chair of the Board of Directors**) should **urgently consult the Local Authority Designated Officer (LADO)**.
- Staff may also make a **direct referral to Social Services** if they feel the concern has not been appropriately addressed, either before or after raising it internally.

Reporting Concerns

Internal Reporting:

- Concerns should be raised **in writing or verbally** with the **Principal or designated manager**.
- If the concern involves the Principal, report directly to the **Chair of the Board of Directors**.

External Reporting:

- In urgent or unresolved cases, concerns can be reported to **relevant regulators or prescribed bodies**, e.g., Social Services, LADO, or the police.
- External disclosure should follow **PIDA guidance** to ensure legal protection.

Investigation Procedure

- **Initial Assessment:** All concerns raised will be reviewed promptly by the Principal or designated manager to decide whether an investigation is necessary and what form it should take. This ensures that issues are addressed quickly and appropriately.
- **Scope of Investigation:** Investigations may be conducted **internally by Elite Mentors**, externally by independent professionals, or by relevant authorities, depending on the nature and seriousness of the concern.
- **Whistleblower Involvement:** The person raising the concern may be asked to **provide further information or evidence** to support the investigation. They will receive **guidance and support** throughout the process to ensure they understand what is required and to protect their wellbeing.
- **Support During Meetings:** Whistleblowers are entitled to **bring a trade union representative, professional association representative, or a colleague** to any meeting related to the investigation.
- **Outcome Communication:** Once the investigation is concluded, the whistleblower will be informed of the outcome, where possible, which may include:
 - Actions to be taken or measures implemented to monitor the issue
 - That there is **insufficient evidence** to pursue the matter further
 - That **no further action** is required
- **Follow-up:** Investigations will be conducted fairly and transparently, and any lessons learned or improvements identified will be recorded to **prevent recurrence** and improve future practices.

Responsibilities of Whistleblowers

Do:

- Record all relevant details, dates, and evidence
- Report concerns to the **Principal or designated manager**
- Follow guidance provided by the policy
- Act promptly to prevent risks from escalating

Do Not:

- Ignore concerns or delay reporting
- Investigate the matter independently
- Confront or accuse individuals directly
- Use the procedure for personal grievances

Recording and Monitoring

- All reports and investigation outcomes will be **kept in a central record** to help Elite Mentors identify serious issues, recurring problems, or patterns that need attention.
- Data on the policy's effectiveness may be shared with **external auditors** if required.
- All information from the initial report and investigation will be handled with the **highest level of confidentiality**.

Escalation

- If unsatisfied with the outcome, the whistleblower may contact the **Chair of the Board of Directors**.
- Further guidance and support are available from **ACAS, Protect (the whistleblowing charity), or trade unions**.

Whistleblowing Procedure Summary:

Elite Mentors encourages staff and partners to report concerns about wrongdoing, malpractice, or risks in confidence. All reports are taken seriously, investigated fairly, and whistleblowers are protected from retaliation, with support and guidance provided throughout the process.

END OF POLICY