

Whistleblowing policy for staff, Council Members and GCC Partners

About this policy

1. The term whistleblowing is used to describe incidents where a member of staff or a member of Council or GCC Partner discloses some alleged wrongdoing within the organisation, publicly or internally but bypassing normal reporting lines.
2. This policy is separate from our policy on how we handle concerns relating to the fitness to practise of individual chiropractors, or complaints about people practising chiropractic while unregistered.
3. The Public Interest Disclosure Act 1998 aims to promote greater openness in the workplace and while it reinforces the obligations for staff not to disclose to external sources any confidential information acquired during the course of their employment, it protects 'whistleblowers' from detrimental treatment, such as victimisation or dismissal, for raising concerns about matters when such concerns are raised in the public interest.
4. This policy provides a means by which staff, Council Members and GCC Partners can make a disclosure if they have reasonable grounds for believing there is serious wrongdoing within the organisation. The issues of concern may include:
 - a criminal offence is being committed, or is likely to be committed, including suspected fraud or misuse of funds;
 - a person has failed, is failing, or is likely to fail to comply with a legal obligation;
 - a miscarriage of justice has occurred, is occurring or is likely to occur;
 - an individual's health or safety, is being, or is likely to be put at risk;
 - the environment has been, is being, or is likely to be damaged;
 - you have information that any of the above has been, is being or is likely to be deliberately concealed.
5. The policy also aims to ensure that anyone who makes a disclosure in such circumstances will not be penalised or suffer any adverse treatment for doing so, regardless of whether their concern is proved unfounded.
6. The policy does not apply to personal grievances concerning an individual's terms and conditions of employment or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters which are all covered by separate policies.

Raising a concern

Staff members

7. In the first instance, you should normally raise the concern (preferably in writing) with the Chief Executive and Registrar.
8. If the issue concerns the Chief Executive and Registrar you should raise it (preferably in

writing) with the Chair of Council. Concerns about the Chair of Council should be raised with the Chair of the Audit Committee.

Council Members and GCC Partners

9. In the first instance you should normally raise the concern with the Chair of the Audit Committee via the following email address
10. As far as possible you will be assured of confidentiality unless at a later stage this becomes unavoidable (for example where an investigation leads to action under disciplinary procedures or criminal or civil proceedings and your evidence is likely to be required). Remaining anonymous can however, in some cases make any potential investigation more difficult and lengthier.
11. The person receiving the disclosure will be responsible for ensuring that the issue is investigated, if they decide that an investigation is warranted. Before doing so, they will inform the Chief Executive and Registrar, the Chair of Council, or the Chair of the Audit Committee as appropriate. In all cases, an independent person may be appointed to investigate the concerns raised.
12. If the person receiving the disclosure decides there are insufficient grounds to warrant an investigation, they will explain this to you giving reasons for their decision. You may then make the disclosure directly to the Chair of the Council or to the Chair of the Audit Committee and ask them to re-consider the decision not to investigate. In the event that the disclosure is about the Chair of the Council and it was the Audit Committee Chair who decided not to investigate, you may instead make the disclosure directly to the independent member of the Audit Committee and ask them to re-consider the decision not to investigate. The independent member of the Audit Committee can be reached via email: AC-IM@gcc-uk.org

Investigating your concerns

13. Any investigation will be handled as sensitively and speedily as possible. You will be notified of the timetable for the investigation. This will depend on the nature of the concern but we will endeavour to complete the investigation within three months. The person or people against whom the disclosure is made will be told at an early stage and will be allowed to respond. Their confidentiality will be respected. The name of the person making the disclosure will not be disclosed at this stage.
14. You will be kept informed of the progress of the investigation and notified if there are delays, with an outline of the reason for the delay. At the end of the investigation (subject to any legal constraints) you will be advised of the outcome in writing.
15. If in the course of the investigation any concern raised appears to the investigator to relate more appropriately to grievance, bullying, harassment or discipline, or a breach of the GCC's Code of Conduct, the relevant procedures will be invoked.
16. The person initiating or undertaking the investigation will ensure that the findings are reported to the Chief Executive and Registrar, Chair of the Council or Chair of Audit Committee as appropriate, who will determine what action should be taken. The report of

the investigation and actions taken will also be reported directly to the Audit Committee, which may meet in private to consider the matter.

17. Any staff member who has made a disclosure and who feels that as a result they have suffered some detriment can submit a formal complaint under the grievance procedure. If it appears there are reasonable grounds for making the complaint the onus will be on the person against whom the complaint of adverse treatment has been made to show that the actions complained of were not taken in retaliation for the disclosure.
18. Any Council Member or GCC Partner who considers that they have suffered some detriment as a result of making a disclosure can make a complaint using the GCC's corporate complaints procedure. Such complaints should usually be made to the Chief Executive and Registrar directly. In the event that the complaint of detriment concerns actions taken by the Chief Executive and Registrar, the Council Member/GCC Partner may instead make the complaint to the Chair of Council. If the complaint of detriment concerns actions taken by both the Chief Executive and Registrar and the Chair of Council, it can be raised with the Chair of the Audit Committee.
19. If you are considering raising a concern and want to receive independent advice before you do so then you can seek advice from the independent charity Public Concern at Work. You can find details of how they can support you at <http://www.pcaw.co.uk/individual-advice/advice-line> or you can call them on 020 7404 6609.