

# **GCSG TRAINING LTD**

## **Policies Document**

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**GCSG Training LTD**  
**Authored by: Nicky Adams**  
**Position: Managing Director**



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# Executive Declaration

GCSG Training Ltd are a company committed and focused to bringing the needs and concerns of our clients to the drawing board and creating a skilled and competent work force via training and education. Along with improving the current workforce by way of assessment and competence development plans.

Through achieving this, we will ensure our clients are achieving the highest possible standards of work whilst executing the work in the safest, most cost effective and efficient way possible.

***“It is the responsibility of GCSG Training Ltd and its staff to ensure all policies and procedures are fair, safe and followed in accordance with local and international law”***

It is the promise of all staff and directors that anyone visiting, dealing with or in communication with GCSG training Ltd, will be always treated in a fair and appropriate manner, and follow the policies within this document.

Nicky Adams  
Managing Director



Date: 22.08.201

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# Equal Opportunities

## POLICY STATEMENT

1. GCSG Trainig Ltd recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to ensure that no employee or job applicant receives less favorable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics).
2. Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.
3. We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.
4. All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.
5. Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services.
6. This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

## OUR COMMITMENT

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- To create an environment in which individual differences and the contributions of all our staff are recognised and valued.
  - Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
  - Training, development and progression opportunities are available to all staff.
  - To promote equality in the workplace which we believe is good management practice and makes sound business sense.
  - We will review all our employment practices and procedures to ensure fairness.
  - Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
  - This policy is fully supported by senior management.
  - The policy will be monitored and reviewed regularly.

It will be Management Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Chief Executive / Business Owner.

Directors / Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination.

Each manager will ensure that: all their staff are aware of the policy and the arrangements, and the reasons for the policy.

## **Equal Opportunities for Delegates and candidates with SEN.**

- Each Candidate shall be uniquely assessed based on their needs
- A discussion should be held prior to and perhaps privately with each candidate to ascertain any additional learning needs required.

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- Additional support may come in the form of
    - More time may be required during learning or tests
    - Additional support during scribing or reading
    - Verbal answers in replacement of written

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# Complaints Procedure

## Complaints Procedure

1. To ensure our services, remain at a high and improving standard, we have a procedure through which you can let us know of for any reason you are not satisfied with your dealings with the organisation.
2. If you are not happy with the GCSG, please tell us If you are unhappy about any of the organisations services.
3. Please speak to the relevant staff member, manager, or Director. If you are unhappy with an individual in GCSG, sometimes it is best to tell him or her directly. If you feel this is difficult or inappropriate, then speak to the staff member's manager or the Director.
4. Often we will be able to give you a response straight away, however when the matter is more complicated, we will give you at least an initial response within five working days.
5. If you are not satisfied with our response or wish to raise the matter more formally, please write to the Managing Director.
6. All written complaints will be logged, and you will receive a written acknowledgement within three working days.
7. The aim is to investigate your complaint properly and give you a reply within ten working days, setting out how the problem will be dealt with, If this is not possible, an interim response will be made informing you of the action taken to date or being considered.
8. If after we have responded to your concerns, you are still not satisfied with the outcome or suggestions, please write to the Managing Director who address your

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concerns directly with the team, which we will then decide on any further steps to resolve the situation.

9. Finally, please also let us know if you are happy with Services that the GCSG are providing.

### **Complaints against and assessment or certification decision**

If you feel something has gone wrong during your course or assessment, or you wish to appeal against a decision we have made, we need you to tell us about it.

This will not only enable us to address the area of concern but may help us to improve our service.

In the processes described above, if there is any dissatisfaction about any aspect of the training, including its decisions which directly or indirectly affects somebody or an organisation, and this is brought to our attention, we categorise such matters as “complaints” and the above steps should be followed.

## **Quality Policy**

**Quality Policy Statement:** At GCSG Training Ltd , we are aware that in order for us to succeed as a quality provider of maintenance, training, turnarounds, construction & modifications, equipment manufacturing and supply, solutions, expert technical advice and the ability to work in any environment, then we rely on our ability to deliver the highest possible standard to our customers.

We must continuously improve that service, while still protecting our people, our contractors, our clients, and the environment. It is our ambition at GCSG Training Ltd to “be recognised as a key influence on the industry and strive towards exceeding expectations”. We work towards being well connected, diverse, innovative, and reputable organisation. By setting standards of excellence, we have shown to enhance our client’s performance and are committed to continually doing so by:

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- Meeting customer satisfaction, the first time, every time.
  - Providing innovations and improvements to the industry.
  - Consistently assessing and surveying our own work for customer satisfaction.
  - Addressing non-performance, non-compliant or any other issue immediately and having this rectified in a quick and suitable manner.
  - Conforming to all National Standards applicable to ourselves and our clients.
  - Having an employee training and competency plan for each role in place, thus ensuring the efficiency and safety of each worker. Our employees, Customers and Contractors are all made aware of this policy, and it is readily available on [www.aberdeencorrosionsolutions.co.uk](http://www.aberdeencorrosionsolutions.co.uk). It is reviewed and updated annually so as it always remains current to GCSG Training Ltd.

## **Equal Opportunities (Third Party)**

1. GCSG Training Ltd recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to ensure that no persons involved or on a site where GCSG is present will received less favorable facilities or treatment (either directly or indirectly) in meetings, visits, demos, training courses or any other form of contact with GCSG. It shall be common practice to never discriminate towards anyone based on age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics).

2. Our aim is that all persons associated with GCSG in any manner will be truly representative of all sections of society and each person feels respected and able to give of their best.



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3. We oppose all forms of unlawful and unfair discrimination or victimization. To that end the purpose of this policy is to provide equality and fairness for all persons whom we may meet.

4. Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services.

5. This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

## **Health, Safety & Environmental (HSE)**

At The GCSG Training Ltd , safety is paramount and our highest priority. Our goals are set out simply, mitigate the risk to ensure no direct or indirect harm to people, the environment, or the asset.

This is our first and most important value when we conduct any business. Safety is a team effort, and we here at The GCSG Training Ltd put effort into our team. We are committed to:

- Ensuring contribution and engagement from all employees.
- Continues improvement goals set and achieves with both our client and employees.
- Complying with National Standards and working towards to prevention of injuries.
- Complying with the ISO 14001.
- Providing a service that is of high-quality regarding production, the environment and safety.

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- Minimising waste and pollution.
  - Promote good health to our clients and employees. We demonstrate this by: Having HSE as a fundamental to our policies and processes.
  - Promoting a healthy and proactive culture within the industry.
  - Assessing every risk and mitigating against these so as these are as low as reasonably practicable.

# Public Interest Disclosure (Whistle Blowing)

## Whistleblowing (Public interest disclosure) Policy Introduction

1. Managing Director wants GCSG to be fair, open and to learn when things go wrong. To do this we need your help. We have developed this policy to reassure you that it is safe and acceptable to speak up and so that you can raise any concern you may have about wrongdoing risk or malpractice at an early stage and in the right way. We would prefer that you raise a matter when you become concerned about it, rather than waiting for proof. You may feel worried about raising a concern or being involved in an investigation, and we understand this, but please don't be put off.

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2. This policy applies to all people who work for us; whether full-time or part-time, employed through an agency or as a contractor. If you have a whistleblowing concern, please let us know. Definition of whistleblowing

3. In this policy, whistleblowing means a worker raising a concern about wrongdoing, risk or malpractice with someone in authority either internally at the GCSG or externally.

4. This Whistleblowing Policy is primarily for concerns where the public interest is at risk, which includes a risk to the public, patients, customers, staff or the organisation itself. A “concern” usually presents a risk to others; is discovered either by witnessing or hearing about the event; has a tailored response rather than being dealt with using a rigid process; and is normally of interest to the wider public not just to the person who is raising the concern.

5. The event may have occurred in the past, or be happening now, or be about to happen. Some examples of concerns include; a criminal offence; a failure to comply with any legal obligation; a failure by colleagues to comply with internal GCSG Rev 1WB 08/2021 policies or requirements; a miscarriage of justice; any matter that may damage the GCSG core public protection role; a danger to the health and safety of an individual; damage to the environment; or a deliberate cover-up of any of the above.

6. If something is troubling you and you think we should know about or look into it, please use this policy. If, however, you wish to make a complaint about your employment or how you have been treated, please use the Grievance policy and / or the Harassment and bullying policy, which you can get from your manager or the HR Policies.

7. If you raise a concern in good faith under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a concern. We consider such behaviour a disciplinary matter. Provided you are raising a concern in good faith, it does not matter

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if you are mistaken. Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

8. With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. Confidentiality means that while you are willing for your identity to be known to the person you report your concern to, you do not want anyone else to know your identity. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed. GCSG Rev 1WB 08/2021

9. If you decide to raise a concern anonymously and we do not know who you are, it will be much more difficult for us to investigate the matter and we cannot provide feedback. How to raise a concern

10. Please remember that you do not need to have firm evidence of malpractice before raising a concern. However we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

11. We hope you will feel able to raise any concern first with your manager or team leader. This may be done verbally or in writing.

12. There will be a discussion with you about confidentiality and what this means in practical terms.

13. If your manager has not undertaken whistleblowing training, they must report the concern to someone who has been trained. This will probably be the director of your directorate (if appropriate), or it may be one of the officers named below.

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14. As the governance team is responsible for managing and reporting on the use of this policy, all whistleblowing concerns must eventually be advised to the Assistant Director of Governance by the manager you raised the concern with. If the concern relates directly to the governance team, it should be reported to the Managing Director.

15. If you feel unable to raise the matter with your manager, for whatever reason, you can raise the matter with:

15.1. Nicky Adams, Managing Director,

16. These people have been given special responsibility and training to deal with whistleblowing concerns. GCSG Rev 1WB 08/2021 What will happen after you raise a concern

17. We will acknowledge receipt of your concern within two working days. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry, or a more formal investigation.

18. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. We will write to you summarising our understanding of your concern and setting out how we propose to handle it and provide a timetable for feedback. We will do our best to provide feedback to you in a way you would prefer. If we have misunderstood the concern or there is any information missing, please let us know.

19. Our aim is to complete investigations in

20. working days unless exceptional circumstances prevent this, in which case we will tell you the expected timetable. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant policy, we will advise you how you can take your concern forward.

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21. Whenever possible, we will give you feedback on the findings and recommendations from the investigation, provided this would not infringe on a duty of confidence we owe to another person.

22. While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly.

23. If at any stage you experience reprisal, harassment, or victimisation for raising a concern please contact the person you raised the concern with, your line manager or the Managing Director. GCSG Rev 1WB 08/2021 Independent advice

24. If you are unsure about raising a concern you can get independent advice from Protect on 020 7404 6609 or by email at [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk). Their lawyers can talk you through your options and can help you raise a concern about malpractice at work. Reporting concerns externally

25. While we hope this policy gives you the assurance you need to raise your concern internally with us, we recognise that there may be circumstances where you feel unable to do so and you consider reporting a concern to an external body.

26. We would rather you raised the concern externally than not at all.

27. Again, we suggest you contact Protect before reporting a concern externally. They will be able to advise you on such an option if you wish. Monitoring of our whistleblowing practices

28. The Managing Director is responsible for this policy and will review it periodically and documents and updates and changes where required.

29. If you have any comments or questions, please do not hesitate to contact the Managing Director. Other information

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30. Your employment rights are protected under section 43J of the Employment Rights Act 1996. This means that if you leave the GCSG and you sign a contract at your departure that includes a non-disclosure or confidentiality agreement, we cannot and will not stop you from raising a whistleblowing concern after you have left the GCSG.

31. We are committed to ensuring that team relationships are not damaged as a result GCSG Rev 1WB 08/2021 of raising a whistleblowing concern, or that relationships are actively repaired once any investigation is complete. How we handle the information you provide to us (GDPR)

32. We will process the data you give us in accordance with the General Data Protection Regulation (GDPR) for the purposes of addressing or investigating your concern.

33. Information about data collection, storage and processing is contained in the Privacy Notice for Employees and Contractors

## Confidentiality

The purpose of this policy is to detail the process for control of confidential documents held within the premises of The Global Corrosions Solutions Group training centre.

This procedure shall apply to all locations where GCSG Training Ltd has a training centre.

Confidential Information is information that would be reasonably understood as confidential or proprietary or is designated as such in writing and includes, but is not limited to: confidential personnel information; private health information; financial information (including addresses, phone numbers, bank and credit card account numbers, income and credit histories, and Social Security numbers

It is an ethical rule in accounting to keep the financial information of the company confidential at all costs. Safety and security measures are considered when transacting money.

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It is essential that all official documentation related to the ongoing running of “the business” i.e. GCSG Training Ltd are kept in a locked place, and that it is the responsibility of either the Admin Manager or Managing Director to always provide and maintain a secure area.

1<sup>st</sup> Responsible Person – Scott Lornie Manager and Key holder

2<sup>nd</sup> Responsible Person – Nicky Adams Managing Director

A credit history report is also required for individuals who may be assigned to finance and accounting positions. Any individuals who have criminal or civil convictions related to financial wrongdoing including, but not limited to, embezzlement, fraud, money laundering, theft or other acts indicating dishonesty may not be assigned to act as Key holder.

The SERVICE PROVIDER ( GCSG Training Ltd ) agrees that it will protect the Confidential Information that it receives from or on behalf of their clients according to commercially acceptable standards and no less rigorously than it protects its own confidential information.

Any unauthorised access identified will be reported via the Safety/Incident book located at Reception, from there it will be investigated, and any findings will be reported to the Managing Director who will take the appropriate course of action.

## **Anti-Slavery**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.



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GCSG Training LTD has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibility for the policy GCSG Training LTD has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

GCSG Training LTD has primary and GCSG-MSPol-001 day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved.

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Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future

## **Bribery and Fraud**

GCSG Training Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented.

GCSG Training Ltd has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

GCSG Training Ltd will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad.

GCSG Training Ltd recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation.

It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

### **Investigating claims of bribery or fraudulent activity**

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## **Employees**

- Report concerns immediately to a senior member of staff, having this in writing noting as much details as possible is best.
- Do not tell anyone other than a senior staff member of the suspected bribery/fraud.

## **Senior Staff members**

- Listen and make note of the concerns of the reporting person
- Do not ridicule the suspicions raised, treat each case as serious and conform to the equal opportunities policy
- All staff included those suspected must be treated with respect and no biased opinion raised.
- Do not interfere with evidence and make sure it is stored safely and correctly.
- Assess the reason for the report and ensure it is justified
- Assess all evidence gathered before making an informed decision
- Should you have to notify the authorities, then this should be done in a discrete manner.
- Bribery in the case of training candidates shall be investigated internally and may result in a candidate being asked to leave until this is complete.

# Maladministration and Malpractice Policy

## Introduction

This policy is aimed at our customers, including learners, who are delivering or registered on a GCSG Training accredited or non-accredited training course, who are involved in suspected or actual malpractice/maladministration. It is also for use by our staff to ensure they deal with all malpractice and maladministration investigations in a consistent manner.

It sets out the steps our centre, and learners or other personnel must follow when reporting suspected or actual cases of malpractice/maladministration and our responsibilities in dealing with such cases. It also sets out the procedural steps we will follow when reviewing the cases.

## Centre's responsibility

It is important that all staff involved in the management, assessment and quality assurance of our qualifications, and learners, are fully aware of the contents of the policy and we have arrangements in place to prevent and investigate instances of malpractice and maladministration.

## Definition of malpractice

Malpractice is essentially any activity or practice which deliberately contravenes regulations and compromises the integrity of the internal or external assessment process and/or the validity of certificates.

It covers any deliberate actions, neglect, default or other practice that compromises, or could compromise:

- The assessment process;
- The integrity of a regulated qualification;
- The validity of a result or certificate;
- The reputation and credibility of GCSG Training Ltd
- The qualification or the wider qualifications community

Malpractice may include a range of issues from the failure to maintain appropriate records or systems, to the deliberate falsification of records to claim certificates.

For this policy this term also covers misconduct and forms of unnecessary discrimination or bias towards certain learners.

## Definition of maladministration

Maladministration is essentially any activity or practice which results in non-compliance with administrative regulations and requirements and includes the application of persistent mistakes or poor administration.

## Examples of maladministration

- Persistent failure to adhere to learner registration and certification procedures
- Persistent failure to adhere to centre recognition and/or qualification requirements and/or associated actions assigned
- Late learner registrations (both infrequent and persistent)
- Unreasonable delays in responding to requests and/or communications
- Inaccurate claim for certificates
- Failure to maintain appropriate auditable records, e.g. certification claims and/or forgery of evidence
- Withholding of information, by deliberate act or omission

## Examples of malpractice

- Failure to carry out internal assessment, internal moderation or internal verification in accordance with requirements
- Deliberate failure to adhere to learner registration and certification procedures
- Deliberate failure to continually adhere to centre recognition and/or qualification approval requirements or actions assigned
- Deliberate failure to maintain appropriate auditable records, e.g. certification claims and/or forgery of evidence
- Fraudulent claim(s) for certificates
- Intentional withholding of information which is critical to maintaining the rigour of quality assurance and standards of qualifications
- Collusion or permitting collusion in exams/assessments
- Learners still working towards qualification after certification claims have been made
- Plagiarism by learners/staff
- Copying from another learner (including using ICT to do so)

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## **Process for making an allegation of malpractice or maladministration**

Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time must immediately notify the Directors of GCSG Training Ltd. In doing so they should put them in writing/email and enclose appropriate supporting evidence.

All allegations must include (where possible):

- Learner's name and GCSG Training Ltd registration number
- GCSG Training Ltd staff members name and job role – if they are involved in the case
- Details of the course/qualification affected, or nature of the service affected
- Nature of the suspected or actual malpractice and associated dates, details and outcome of any initial investigation carried out by the centre or anybody else involved in the case, including any mitigating circumstances

The Director will then conduct an initial investigation to ensure that staff involved are competent and have no personal interest in the outcome of the investigation.

In all cases of suspected malpractice and maladministration reported we'll protect the identity of the 'Whistle Blower' in accordance with our Whistle Blowing (Delegates) Policy.

If the complainer is not happy with the investigation process or outcome, s/he may raise their concern with the appropriate Awarding Body. Contact details of the Awarding Bodies can be found at [www.GCSGtrainigltd.com](http://www.GCSGtrainigltd.com).

## **Responsibility for the investigation**

In accordance with regulatory requirements all suspected cases of maladministration and malpractice will be examined promptly by GCSG Training Ltd to establish if malpractice or maladministration has occurred and we will take all reasonable steps to prevent any adverse effect from the occurrence. We will acknowledge receipt, as appropriate, to external parties within 7 days.

Our Director will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy and will allocate a relevant member of staff to lead the investigation and establish whether or not the malpractice or maladministration has occurred, and review any supporting evidence received or gathered by GCSG Training Ltd.

## Notifying relevant parties

Where applicable, our director will inform the appropriate regulatory authorities if we believe there has been an incident of malpractice or maladministration which could either invalidate the award of a qualification or if it could affect another awarding organisation.

Where the allegation may affect another awarding organisation and their provision we will also inform them in accordance with the regulatory requirements and obligations.

### Investigation timelines and summary process

We aim to action and resolve all stages of the investigation within 10 working days of receipt of the allegation.

The fundamental principle of all investigations is to conduct them in a fair, reasonable, and legal manner, ensuring that all relevant evidence is considered without bias. In doing so investigations will be based around the following broad objectives:

- To establish the facts relating to allegations/complaints in order to determine whether any irregularities have occurred
- To identify the cause of the irregularities and those involved
- To establish the scale of the irregularities
- To evaluate any action already taken
- To determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of GCSG Training Ltd and the qualification
- To identify any adverse patterns or trends

The investigation may involve a request for further information from relevant parties and/or interviews with personnel involved in the investigation. Therefore, we will:

- Ensure all material collected as part of an investigation is kept secure
- If an investigation leads to invalidation of certificates, or criminal or civil prosecution, all records and original documentation relating to the case will be retained until the case and any appeals have been heard and for five years thereafter
- Expect all parties, who are either directly or indirectly involved in the investigation, to fully co-operate with us

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Either at notification of a suspected or actual case of malpractice or maladministration and/or at any time during the investigation, we reserve the right to withhold a learner's results.

Where a member of GCSG Training Ltd staff or an associate is under investigation we may suspend them or move them to other duties until the investigation is complete.

Throughout the investigation our Director will be responsible for overseeing the work of the investigation team to ensure that due process is being followed, appropriate evidence has been gathered and reviewed and for liaising with and keeping relevant external parties informed.

### **Investigation report**

After an investigation, we will produce a draft report for the parties concerned to check the factual accuracy. Any subsequent amendments will be agreed between the parties concerned and ourselves. The report will:

- Identify where the breach, if any, occurred
- Confirm the facts of the case
- Identify who is responsible for the breach (if any)
- Confirm an appropriate level of remedial action to be applied

We will make the final report available to the parties concerned and to the regulatory authorities and other external agencies as required.

If it was an independent/third party that notified us of the suspected or actual case of malpractice, we will also inform them of the outcome – normally within 10 working days of making our decision – in doing so we may withhold some details if to disclose such information would breach a duty of confidentiality or any other legal duty.

### **Investigation outcomes**

If the investigation confirms that malpractice or maladministration has taken place we will consider what action to take in order to:

- Minimise the risk to the integrity of certification now and in the future
- Maintain public confidence in the delivery and awarding of qualifications



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- Discourage others from carrying out similar instances of malpractice or maladministration
  - Ensure there has been no gain from compromising our standards

**The action we take may include:**

- Imposing actions to address the instance of malpractice/maladministration and to prevent it from reoccurring
- In cases where certificates are deemed to be invalid, inform the Awarding Organisation concerned and the regulatory authorities why they are invalid and any action to be taken for reassessment and/or for the withdrawal of the certificates. We will also let the affected learners know the action we are taking and that their original certificates are invalid and ask – where possible – to return the invalid certificates to GCSG Training Ltd
- Informing relevant third parties (e.g., employing company) of our findings in case they need to take relevant action in relation to the centre.

## **Whistle Blowing Policy (Delegates)**

### **Introduction**

This document outlines GCSG Trainings' (Here in referred to as GCSG) policy and procedure for how an individual can confidentially and anonymously report concerns to GCSG Training, regarding the delivery of Accredited and non-accredited training courses.

### **The intended audience of this document is:**

- Learners registered on a course
- Apprentices
- Anyone else not directly involved with the training

### **Purpose**

The purpose of this document is to:

1. Outline in which instances an individual should inform GCSG Training of an allegation.
2. Outline how an individual can confidentially report suspected malpractice or maladministration to GCSG.

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3. Outline how GCSG will protect the interests and confidentiality of whistle-blowers, wherever this is possible.
  4. Inform an individual how GCSG will respond to a whistleblowing allegation.

### **Policy**

Whistleblowing is a term used to describe when an individual discloses concerns or information relating to potential malpractice or maladministration. Malpractice or maladministration can be committed by a Centre staff member, a learner, an employer or another third party.

If an individual has concerns regarding the practices of GCSG, a staff member or a Learner, they must first assess whether it would be appropriate to first report the concern to GCSG itself. If concerns are raised to GCSG and you are not satisfied that the concerns have been adequately investigated, or, that the issue is still occurring, you may wish to notify the awarding organisations. Details of which can be found at [www.GCSGTrainingLtd.com](http://www.GCSGTrainingLtd.com)

There are a range of concerns that an individual may wish to raise under the External Whistleblowing Policy, including, but not limited to:

1. An individual suspects that a GCSG, staff member or a learner has committed, or is complicit with an instance of malpractice.
2. An individual suspects that GCSG is not compliant with the Awarding Organisation, End Point Assessment Organisation or ESFA Approval Criteria.
3. An individual suspects that a GCSG, staff member or a learner is involved in fraud or other illegal activity regarding qualifications or apprenticeships.
4. An individual has been asked, or forced, to perform an activity that they believe constitutes as malpractice.

### **Confidentiality :**

GCSG take all whistleblowing allegations seriously and will investigate disclosures in a sensitive and discreet manner. Individuals who make disclosures can have their identity kept confidential upon request. GCSG understands the importance of confidentiality for whistle-blowers and, where it has been requested, will aim to protect an individual's anonymity, however this cannot be guaranteed.

It is important to note that GCSG may not be able to investigate a concern as effectively if an allegation is made to GCSG anonymously. GCSG encourages individuals

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to provide their name and details when raising their allegation, as we may need to contact the individual raising the concern for further information, or, to verify details provided throughout an investigation.

There may be instances where GCSG must reveal an individual's details, such as, if required to do so by law. Once an investigation into the allegations commences, individuals should also consider that they may be identifiable due to the nature, or content of their allegations.

## Procedure

### Identifying Malpractice:

In the first instance, where an individual suspects malpractice, they must first report it to the GCSG Manager or Director, where it is appropriate to do so. GCSG will investigate and respond to all concerns, as well as reporting all cases of suspected malpractice to the relevant external body.

GCSG understands that it may not always be appropriate for an individual to report a concern directly to us. In these cases, individuals should raise their concerns directly with the external body for their investigation. Examples where this may be applicable include, but may not be limited to:

1. The individual(s) who handles incidents of malpractice within GCSG is involved, or may be complicit, with the incident.
2. The individual raising the concern believes that they may be victimised by raising their concerns to GCSG or an individual.
3. The individual raising the concern believes that the GCSG internal policy for dealing with cases of malpractice or maladministration is not being followed.
4. The individual raising the concern believes that once the incident has been reported it will not be dealt with correctly and/or may be covered up by GCSG or the individual involved.

### Making an Allegation to GCSG

If an individual wishes to raise an allegation of malpractice to GCSG, they must contact the Manager or Director by email, telephone, or letter. Details can be found at [www.gcsgtrainingltd.com](http://www.gcsgtrainingltd.com). GCSG would encourage an individual to notify GCSG of their concerns as soon as possible, to minimise the loss of information over time and to make it easier for GCSG to investigate the allegation.

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If an allegation is made by telephone, individuals may be asked to produce a written statement as supporting evidence. The name of the individual will be redacted from statements, upon the individual's request.

Although whistle-blowers are not expected to prove an allegation, they will need to demonstrate that there is sufficient grounds for their concerns in order for GCSG to investigate. Therefore, whistle-blowers should aim to provide as much information as possible regarding their concern. This includes, but is not limited to:

1. The background and history to the allegation.
2. Any specific details available including names, dates, times and places.
3. Details of any evidence which supports the concern.
4. Full details of the allegations, including the GCSG provision which is involved.
5. The individual's involvement, response and any personal interest they may have in the matter (if applicable).
6. How they think that things may be put right, if possible.

If it is identified that the allegation was against an employer with whom GCSG works, the allegation will be passed onto the employer, who will follow their own whistleblowing procedure.

#### How GCSG Training Ltd Will Respond

Once an allegation is made, the manager or director will contact the complainer and:

1. Confirm that the allegation has been received.
2. Indicate whether GCSG will be investigating the matter or not.
3. Request any further information which is required from the individual regarding the matter.

Initial enquires will be made to decide whether the allegation requires an investigation, and if so, in what form. If an investigation is required, the Quality and Curriculum Manager will conduct this in line with the GCSG Malpractice and Maladministration Policy. GCSG Managing Director will be notified of all allegations received.