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## **GBS Whistleblowing Policy**

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<b>Document title</b>	GBS Whistleblowing Policy
<b>Oversight Committee</b>	Executive Board
<b>Policy lead (Staff member accountable)</b>	Head of HR
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#### Related GBS policies

- GBS Data Protection Policy
- GBS Staff Grievance Policy
- GBS Equality and Diversity Policy
- GBS Anti-Harassment and Anti-Bullying Policy
- GBS Anti-Bribery Anti-Corruption Policy

#### External Reference Points

1. UK Public General Acts, *Employment Rights Act 1996*, Accessed online at: <https://www.legislation.gov.uk/ukpga/1996/18/section/1>
2. UK Public General Acts, *Public Interest Disclosure Act 1998*, Accessed online at: <https://www.legislation.gov.uk/ukpga/1998/23/contents>
3. UK Public General Acts, *Data Protection Act 2018*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
4. Regulations originating from the EU, *Regulation (EU) 2016/679 of the European Parliament and of the Council*, Accessed online at: <https://www.legislation.gov.uk/eur/2016/679/contents>
5. Information Commissioner's Office, Accessed online at: <https://ico.org.uk/>
6. Independent Advice, *Protect, speak up, stop harm* Accessed online at: <https://protect-advice.org.uk/>

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## Global Banking School Whistleblowing Policy

### 1. Policy Statement

1.1 Global Banking School (GBS) is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

1.2 The Public Interest Disclosure Act 1998 (“PIDA”) protects staff against victimisation or dismissal as a result of making a report of malpractice by their employers or third parties where that report is made in accordance with PIDA.

### 2. Purpose

2.1 This policy seeks to reassure individuals that it is acceptable and safe for them to raise such concerns without fear of detriment and to provide a clear procedure for doing so. All disclosures (i.e., the sharing of information relating to potential wrongdoing) will be acted upon promptly, sensitively, fairly, and properly. All disclosures will be treated confidentially to the extent that this is compatible with a thorough investigation, where deemed necessary.

### 3. Scope

3.1 This policy is applicable to all individuals within GBS. Any individual who witnesses instances of wrongdoing, should ensure to raise these concerns, and follow the whistleblowing policy. To prevent further wrongdoing, all individuals should feel comfortable raising any whistleblowing concerns.

### 4. Definitions

4.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include (though is not necessarily limited to):

- Criminal activity.
- Miscarriages of justice.
- Danger to health and safety.
- Damage to the environment.

- Failure to comply with any legal or professional obligation or regulatory requirements.
- Financial fraud or mismanagement.
- Negligence; or
- The deliberate concealment of any of the above matters.

4.2 A whistleblower is a person who raises a genuine concern in good faith relating to any of the above. If staff have any genuine concerns related to suspected wrongdoing or danger affecting any of GBS' activities (a whistleblowing concern) staff should report it under this policy.

## 5. Equality and Diversity

5.1 Current employment law imposes obligations on employers not to discriminate on the grounds of a protected characteristic, age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy, and maternity. GBS is committed to tackling unfair and unlawful discrimination. We are also committed to actively promoting equality and celebrating diversity to create a harmonious and productive environment in which diversity adds value to our work. We seek to create a culture where all staff are encouraged to reach their full potential.

## 6. Roles and Responsibilities

6.1 **Whistleblowers-** Responsible for raising concerns. All information disclosed should be accurate, truthful, and subjective to the best of the individual's knowledge.

6.2 **Senior Management and Line Managers-** Responsible for ensuring that concerns raised by the individual are taken seriously. They must ensure employees are made aware of this whistleblowing policy. Any matter raised should be promptly and thoroughly investigated by an appropriate Senior Manager.

6.3 **Human Resources-** Responsible for maintaining impartiality and ensuring that concerns are taken seriously, and whistleblowers are treated with respect and equality. Human Resources must action any instances of whistleblowers being victimised via GBS Staff Disciplinary Policy.

## 7. Whistleblowing Procedure

7.1 The whistleblowing procedure has three stages:

- Stage 1- Raising a Whistleblowing Concern
- Stage 2- Investigation
- Stage 3- Outcome

## **7.2 Stage 1- Raising a Whistleblowing Concern**

7.2.1 GBS hopes that in many cases, staff will be able to raise any concerns informally with the person concerned. Staff may tell them in person or put the matter in writing, if preferred. Staff may be able to agree a way of resolving the concern quickly and effectively. Where the matter is more serious, they must go directly to HR. Individuals are encouraged to put their name to any disclosure they make, in the interests of openness and transparency.

7.2.2 GBS may not be in a position to effectively address a disclosure raised anonymously, although may attempt to do so after taking account of the following:

- The seriousness of the issue raised.
- The credibility of the disclosure.
- The likelihood of being able to investigate the matter and to use alternative sources to verify the allegation.
- Fairness to any individual(s) mentioned in the disclosure.

7.2.3 A staff meeting will be arranged as soon as possible to discuss their concern. Staff may bring a member of staff as a companion to any meetings under this policy. A companion must respect the confidentiality of the disclosure and any subsequent investigation.

7.2.4 GBS will summarise the concern and provide staff with a copy after the meeting and will aim to provide staff an indication of how the matter will be resolved.

## **7.3 Stage 2- Investigation**

7.3.1 Once staff have raised a concern, GBS will carry out an initial assessment to determine the scope of any investigation. The member of staff will be informed of the outcome of the assessment. Staff may be required to attend additional meetings in order to provide further information.

7.3.2 In some cases, GBS may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable GBS to minimise the risk of future wrongdoing.

7.3.3 GBS will aim to keep staff informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent providing staff specific details of the investigation or any disciplinary action taken as a result. Staff should treat any information about the investigation as confidential.

7.3.4 If GBS concludes that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower will be subject to strict disciplinary action.

#### **7.4 Stage 3- Outcome**

7.4.1 While GBS cannot always guarantee the outcome staff are seeking, employee concerns will be dealt with fairly and in an appropriate way. By using this policy staff can help GBS achieve this.

7.4.2 If staff are not happy with the way in which their concern has been handled, staff can raise a complaint through GBS Staff Grievance Policy.

### **8. External Disclosures**

8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally.

8.2 Whistleblowing concerns usually relate to the conduct of members of staff; however, they may sometimes relate to the actions of a third party. The law allows staff to raise a concern in good faith with a third party, where staff reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, GBS encourages staff to report such concerns internally first.

## **9. Protection and Support for Whistleblowers**

9.1 It is understandable that whistle-blowers are sometimes worried about possible repercussions. GBS' aim is to encourage openness and will provide support to staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

9.2 Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If staff believe that they have suffered any such treatment, staff should inform a member of the Senior Management team, Managing Director and/or Chief Executive Officer immediately. If the matter is not remedied, staff should raise it formally using GBS Staff Grievance Policy.

9.3 Staff must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## **10. Anonymous disclosures**

10.1 There may be occasions when members of staff feel that the circumstances of any allegation of malpractice or impropriety are such that they can only make a disclosure anonymously. Unfortunately, it can be difficult to investigate anonymous disclosures properly and there may be instances in which, having taken all the information available into account, GBS might not be able, or may consider that it is inappropriate, to pursue anonymous allegations.

10.2 Whistle-blowers who are concerned about possible reprisals if their identity is revealed, should come forward to the person to whom they made the disclosure and appropriate measures can then be taken to preserve confidentiality.

## **11. Monitoring and Review**

11.1 This policy may be amended by GBS at any time and will be reviewed annually to ensure it is fit for purpose. Any issues related to the monitoring and review of this policy, please contact [asgo@globalbanking.ac.uk](mailto:asgo@globalbanking.ac.uk).

## **12. Data Protection and Confidentiality**

12.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the Information Commissioners website. GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

12.2 GBS reserves the right and may be under a legal obligation to share information in exceptional circumstances where such disclosure is necessary to protect any individual or GBS staff, students, visitors from harm or to prevent a crime from taking place. All individuals involved in any process under this policy must keep information that is disclosed to them as part of the process, private and confidential.

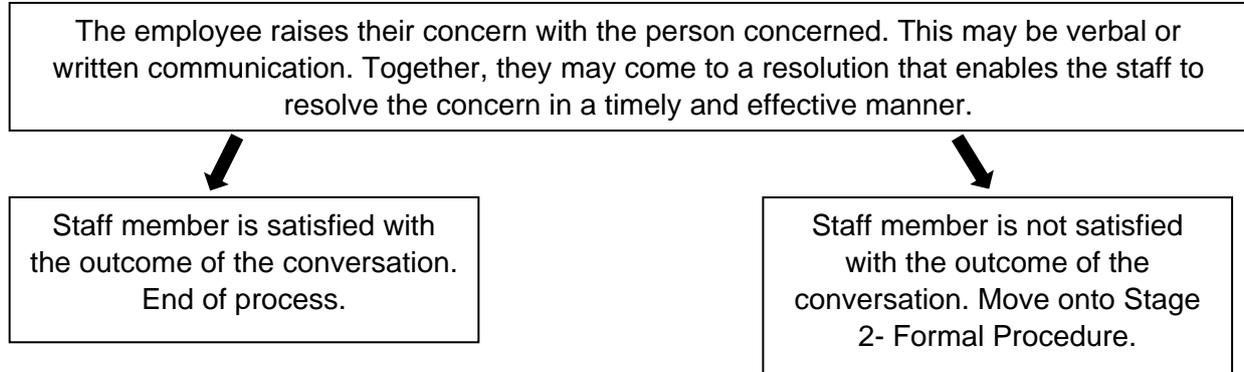
### 13. Alternative Format

13.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Welfare Management Team
- **Position:** Welfare Officer/Manager
- **Email:** welfare@globalbanking.ac.uk

**Appendix A- Whistleblowing Policy Flowchart**

**Stage 1 - Informal Procedure**



**Stage 2 - Formal Procedure**

