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## **GBS Whistleblowing Policy**

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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 everybody at GBS 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 to prevent such situations occurring or to address them when they do occur.

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

### **2. Purpose**

2.1 This policy seeks to set out clearly that it is acceptable and safe for individuals to raise concerns and to reassure them, that can do so without fear of detriment. It also clarifies the procedure for raising concerns. 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 applies to all individuals within GBS. Any individual who witnesses instances of wrongdoing within the scope of this policy is encouraged to follow the procedure set out in this policy.

### **4. Definitions**

4.1 **Whistleblowing** is the disclosure of information that relates to suspected wrongdoing or dangers at work. The scope of protection is defined by PIDA and covers:

- a criminal offence;
- the breach of a legal obligation;
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- damage to the environment; or
- an attempt to cover up any of the above.

Examples of issues which might be Whistleblowing Concerns include:

- (a) bribery (under our Anti-corruption and Bribery Policy);
- (b) financial fraud or mismanagement or impropriety;
- (c) negligence;
- (d) significant breach of a legal or regulatory obligation
- (e) unauthorised disclosure of confidential information;
- (f) unauthorised use of data;
- (g) academic or professional malpractice;
- (i) the deliberate concealment of any of the above matters.

4.2 This whistleblowing policy should not be used for complaints relating to a personal grievance that is not in the public interest; for example, the way you believe that you have been treated at work or, if you are a student, a complaint about any aspect of student life or an academic appeal. In those cases, you should use the Staff Grievance Procedure, Student Complaints Policy, and Procedure as appropriate.

4.3 A whistleblower is a person who raises a genuine concern in good faith relating to any of the above. If you have genuine concerns related to suspected wrongdoing or danger affecting any of GBS' activities (a whistleblowing concern) you should report it under this policy. Anyone knowingly making a false allegation may face action under the Disciplinary/Misconduct Procedure.

## **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 everyone is 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 Whistleblowing Team** - Responsible for maintaining impartiality and ensuring that concerns are taken seriously, and whistleblowers are treated with respect and equality.

## **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, you will be able to raise any concerns informally with your line manager or if you are a student, with student services. You may tell them in person or put the matter in writing if preferred. You may then be able to agree on a way of resolving the concern quickly and effectively. In some cases, your line manager or the student services team may feel that your concern should be referred to the WBT; if so, they will discuss this with you before making the referral.

7.2.2 Where the matter is more serious, or you feel that your line manager or Supervisor has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact [whistleblowing@globalbanking.ac.uk](mailto:whistleblowing@globalbanking.ac.uk). Individuals are encouraged to put their name on any disclosure they make, in the interests of openness and transparency.

7.2.3 GBS may not be able to effectively address a disclosure raised anonymously, although it 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 use alternative sources to verify the allegation.
- Fairness to any individual(s) mentioned in the disclosure.

7.2.4 In some cases, a meeting will be arranged to discuss the concerns further. You may bring someone (such as a staff member) as a companion to any meeting under this

policy. A companion must respect the confidentiality of the disclosure and any subsequent investigation.

- 7.2.5 GBS will summarise the concern and aim to provide you with an indication of how the matter will be resolved and the timescale for completion.

### **7.3 Stage 2- Investigation**

- 7.3.1 Once you have raised a concern, GBS will carry out an initial assessment to determine the scope of any investigation. You will be informed of the outcome of the assessment. You may be required to attend additional meetings to provide further information.

- 7.3.2 In some cases, GBS may appoint an investigator or team of investigators including staff members 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 you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent providing you with specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as strictly confidential.

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

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

- 7.4.1 While GBS cannot always guarantee the outcome you are seeking, your concerns will be dealt with fairly and appropriately. By using this policy, you can help GBS achieve this.

- 7.4.2 If you are not happy with how your concern has been handled, you can raise a complaint through the GBS Staff Grievance Policy or Student Complaints Policy and Procedure.

## **8. External Disclosures**

8.1 This policy aims to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

8.2 A report of progress made by GBS on current, PIDA-relevant, whistleblowing cases will be made at meetings of GBS's Audit and Risk Committee (ARC). The ARC provides a report to the GBS Board of Directors. All individuals involved will keep information that is disclosed to them as part of the process, private and confidential.

8.3 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 you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, GBS encourages you to report such concerns internally first.

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

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

9.2 You 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 you believe that you have suffered any such detrimental treatment, you should inform a member of the Senior Management team, Managing Director, and/or Chief Executive Officer immediately. If the matter is not remedied, you should raise it formally using the GBS Staff Grievance Policy or Student Complaints Policy and Procedure.

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

## **10. Anonymous disclosures**

10.1 We hope that you will feel able to raise your concerns openly under this policy and we would hope that you do not feel the need to raise your concern on an anonymous basis. However, you may, if you wish, raise your concerns in confidence. We do not encourage you to make disclosures anonymously as 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 Whistleblowers 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. For any issues related to the monitoring and review of this policy, please contact [asqo@globalbanking.ac.uk](mailto:asqo@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 Office website](#). GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that all 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).

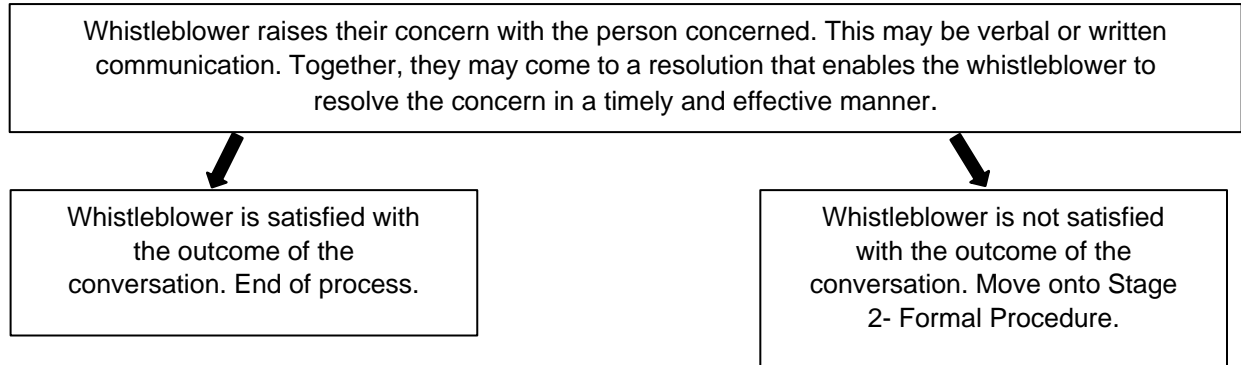
12.2 GBS reserves the right and may be under a legal obligation to share information in exceptional circumstances where such disclosure is necessary to protect any individual or GBS staff, students, or visitors from harm or to prevent a crime from taking place. All individuals involved in any process 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 the Academic Standards and Quality Office at [asqo@globalbanking.ac.uk](mailto:asqo@globalbanking.ac.uk).

**Appendix A- Whistleblowing Policy Flowchart**

**Stage 1 - Informal Procedure**



**Stage 2 - Formal Procedure**

