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GBS Whistleblowing Policy

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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



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 the above 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 crea



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.



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 disciplin





12.1 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

The employee raises their concern with the person concerned. This may be verbal or written communication. Together, they may come to a resolution that enables the staff to resolve the concern in a timely and effective manner.



Staff member is satisfied with the outcome of the conversation.
End of process.

Staff member is not satisfied with the outcome of the conversation. Move onto Stage 2- Formal Procedure.

Stage 2 - Formal Procedure

The concern is submitted in writing to Human Resources.

A member of Human Resources will undertake an initial assessment of the concern. The employee may be required to attend additional meetings to provide further information.

GBS may appoint investigator(s) who have specific knowledge in this area to conduct inquiries. This may include other members of staff or regulatory bodies.

The investigators conclude that there is evidence of wrongdoing and feedback to HR. This may result in a disciplinary investigation against the member of staff concerned. See disciplinary policy.

The investigators find no evidence of wrongdoing and feed this back to HR.

Employee is satisfied with the outcome of the investigation. End of process.

Employee is dissatisfied with the outcome of the investigation and can escalate to a member of Senior Management via GBS Staff Grievance Policy.

Employee may be ber

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