

Whistle Blowing Policy	Policy Ref: SMBP016
-------------------------------	--------------------------------

1.	Purpose
	This policy sets out the Whistle Blowing Policy of The SMB Group and any subsidiaries (referred to as 'the College' in this policy).
2.	Scope
	The Policy applies to all employees, workers and agency workers.
3.	Policy Statement
	This policy seeks to positively encourage workers to make disclosures internally.
4.	Responsibilities
	This policy applies to all workers, additional responsibilities are noted in section 2.
5.	Equality and Diversity Impact Measure
	The College has considered the Equality and Diversity implications in relation to the rules and policies set out in this document. It does not consider them to unduly impact upon any protected group.
6.	Environmental Impact Assessment
	The College has considered environmental implications in relation to the rules and policies set out in this document. This policy has no environmental impact.
7.	Data Protection Impact
	The impact of this policy on an individual's data has been considered and complies with current legislation.
8.	Associated Policies, Processes, Procedures or Guidance
	The following are policies, processes, procedure or guidance which should be referred to alongside this policy: <ul style="list-style-type: none"> • Grievance Policy • Whistle Blowing Procedure

Person Responsible for Policy: Vice Principal of Resources
Date Policy Written: January 2020
Date Approved by SMT: January 2020
Date Approved by Governors: February 2020
Date for Review: February 2023

Version	Date	Status & changes	Author
1	3rd February 2020	Proposed Whistleblowing Policy	Vice Principal of Resources



Contents

1. Purpose and Objectives
2. Responsibilities
3. Introduction
4. Scope of the Policy
5. Policy
 - 5.1 Protected Disclosures
 - 5.2 Specific Subject Matter
6. Equality and Diversity Impact Measures
7. Environmental Impact Assessment
8. Monitoring and Review

1. Purpose and Objectives

The College is committed to operating in an ethical and principled way. The aim of this policy is to provide employees and workers (referred to as 'workers' in this policy) with a means for raising genuine concerns of suspected bribery, breaches of the law and other serious wrongdoings.

This policy applies to all employees of the College, and includes:-

- Workers which includes any casual workers; home-based casual workers; and employees of subcontractors
- Agency workers engaged by the College.
- Apprentices working for the College.

Workers might be unsure whether it is appropriate to raise their concern under this policy and procedure or whether it is a personal grievance, which is more appropriate to raise under the College's grievance procedure. Any worker in this situation is encouraged to approach Vice Principal of Human Resources and Organisational Development in confidence for advice.

2. Responsibilities

Vice Principal of Human Resources and Organisational Development: responsible for giving guidance to employees on the whether a matter falls within the whistleblowing policy and procedure.

College employee: responsible for raising specific matters where conduct is deemed to be inappropriate, brings an individual or the college into disrepute, or endangers an individual.

3. Introduction

The College encourages workers to raise genuine concerns about suspected wrong doing at the earliest stage. This policy is intended to provide safeguards to enable workers to raise concerns about malpractice in connection with the College.

4. Scope of the policy

This policy aims to encourage workers to raise genuine concerns through internal College procedures without fear of adverse repercussions being taken against them.

This Policy is intended to cover concerns that are made in the public interest.

The law allows workers to raise such concerns externally and this policy informs workers how they can do so. However, a failure to raise a concern under this policy may result in a disclosure losing its protected status under the law.

5. Policy

The College appreciates that those reporting concerns may be apprehensive. The College wants to reassure workers that they will suffer no detrimental treatment as a result of voicing concerns.

The College will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

5.1 Protected disclosures

The law protects workers who, out of a sense of public duty, want to reveal suspected wrongdoing or malpractice. The law allows workers to raise what it defines as a 'protected disclosure'. In order to be a protected disclosure, a disclosure must relate to a specific subject matter and the disclosure must also be made in an appropriate way. A 'protected disclosure' must, in the reasonable belief of the worker making it, also be made in the public interest. A protected disclosure must consist of information and not merely be allegations of suspected malpractice.

5.2 Specific Subject Matter

If, in the course of employment, a worker becomes aware of information which they reasonably believe tends to show one or more of the following, they must use this policy and the associated procedure:-

- That a criminal offence has been committed, is being committed or is likely to be committed.
- That an individual has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- That a miscarriage of justice has occurred, is occurring, or is likely to occur.
- That the health or safety of any individual has been, is being, or is likely to be, endangered.
- That the environment, has been, is being, or is likely to be, damaged.
- That information tending to show any of the above, is being, or is likely to be, deliberately concealed.

6. Equality and Diversity Impact Measures

The college has considered the Equality and Diversity implications in relation to this document and does not consider them to unduly impact upon any protected group.

7. Environmental Impact Assessment

This policy has not been assessed as to have an environmental impact.

8. Monitoring and Review

This policy should be reviewed every 3 years, subject to legislative changes.