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GBS Whistleblowing Policy

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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.



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.

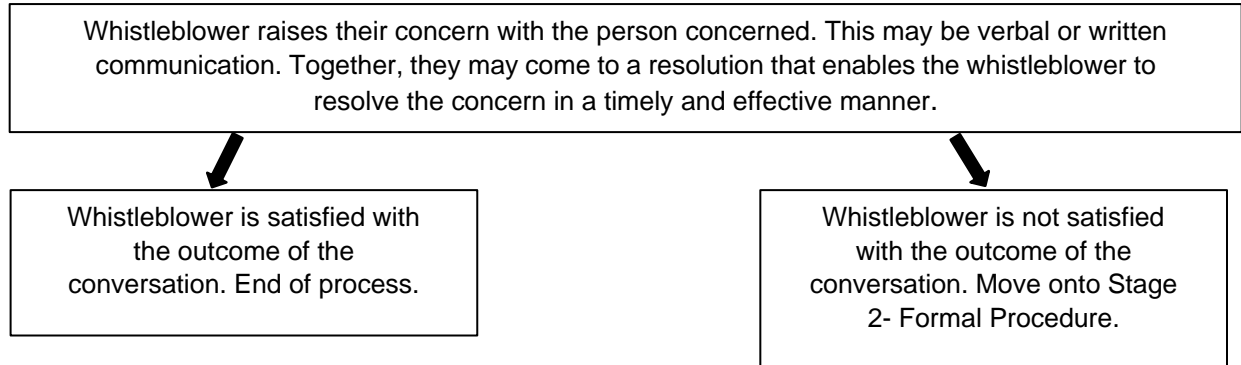
7.3.2 In some cases, GBS may appoint an investigator or team of investigators including staff members with relevant experience including investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable GBS to minimise the risk of future wrongdoing.



8.1 This policy aims

Appendix A- Whistleblowing Policy Flowchart

Stage 1 - Informal Procedure



Stage 2 - Formal Procedure

