

Global Whistleblowing Policy

Policy:	Global Whistleblowing Policy
Version:	7.0
Synopsis:	This policy defines Study Group principles with regard to the reporting of concerns by staff
Policy Owner:	Chief Legal & Compliance Officer
Relevant to:	All staff globally
Publication:	This policy will be made available to staff via myStudyGroup
Date introduced:	1 June 2016
Next review date:	This policy will be reviewed annually, or in line with legislative or regulatory changes or guidance from Codes of Practice.
Related Documents:	Disciplinary Policy, Grievance Policy

Version Control	Date Issued	Next Review
1.0	September 2015	August 2016
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5.0	November 2018	July 2019
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7.0	July 2022	July 2024

Whistleblowing Policy

About this Policy

We are committed to conducting our business with honesty and integrity and expect all staff to maintain high standards. It is therefore important that any fraud, misconduct or wrongdoing is reported promptly and properly dealt with. Study Group encourages all individuals to raise concerns that they may have about how the business is run or the conduct of others. Everyone at Study Group should be aware of the importance of preventing and eliminating wrongdoing at work.

What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers within our business. This may include:

- a) criminal activity;
- b) failure to comply with any legal obligation or regulatory requirements;
- c) miscarriages of justice;
- d) danger to health and safety;
- e) dangerous or unethical activity;
- f) damage to the environment;
- g) bribery under our Anti-corruption and Bribery Policy;
- h) facilitation of tax evasion;
- i) breach of our internal policies and procedures including our Code of Conduct;
- j) conduct likely to damage our reputation or financial wellbeing;
- k) unauthorised disclosure of confidential information;
- l) negligence;
- m) the deliberate concealment of any of the above matters.

Aims of the Policy

This policy enables you to raise any genuine concerns you have regarding suspected wrongdoing in a safe, timely and structured manner. This policy applies to all employees, officers, consultants, contractors, casual workers and agency workers. Any individual working at Study Group who holds a genuine belief that we as an organisation, your manager(s), colleagues or our third party suppliers are acting inappropriately, should raise concerns immediately to the appropriate level of senior management.

An instruction to cover up wrongdoing or a failure to escalate a known issue in itself is a disciplinary offence.

Where applicable, any safeguarding concerns you have regarding our students must be raised immediately in line with our 'Students First' value, as we are all collectively responsible for delivering the highest duty of care to our students' education and wellbeing. You should raise these via your local Safeguarding policy or alternatively using the Whistleblowing reporting form (overleaf) instead.

You can be assured that your concerns will be treated seriously and, wherever possible, matters dealt with confidentially. You will not be penalised for raising concerns where you hold a genuine belief that something is fundamentally wrong and raise this in good faith via the internal process, without bringing our reputation into disrepute.

If misconduct is discovered as a result of any investigation under the Whistleblowing Policy, then Study Group's Disciplinary Policy will be used to undertake action against the individual concerned, in addition to any other measures which Study Group may deem appropriate.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body. It will very rarely, if ever, be appropriate to alert the media. However, we encourage you to report such concerns internally first and allow Study Group time to investigate and respond to your concerns. We would strongly encourage you to seek independent advice before reporting a concern to anyone externally. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline where you can get advice. The charity also has a list of prescribed regulators for reporting certain types of concern.

When is Whistleblowing Inappropriate?

As the whistleblowing policy provides a safe and supportive route for reporting suspected wrongdoing, it is not appropriate to use the Whistleblowing process for matters that are better resolved via discussion at a local management level, or for grievances which are related to your employment (in which case you should refer to Study Group's Grievance Procedure).

Protection and Support for Whistle-blowers

Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your People Experience Partner immediately. If the matter is not remedied you should raise it formally using the Grievance Procedure.

As whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern, no employee of the company must threaten or retaliate against whistle-blowers in any way. If an employee is involved in such conduct, they will be subject to disciplinary action.

If we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to their manager and/or People Experience Partner and appropriate measures can then be taken to preserve confidentiality.

How do I report Whistleblowing?

You report it immediately using one of the following methods:

- In person to senior management.
- Via our externally hosted Hotline <https://studygroup.ethicspoint.com>

In situations where you would prefer to make an anonymous report in confidence, you should use this hotline, hosted by a third party provider, EthicsPoint. Once you have identified your location, you have the option to either report via telephone using an International Toll-Free service or by completing an online form.

If you are in doubt as to whether to report a matter or not, then you should initially seek advice from your manager or People Experience Partner.

Where the matter is more serious, or you feel that your manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact Study Group's Chief Legal & Compliance Officer.

What Happens If I Whistleblow?

Your submitted written concern will be acknowledged within a reasonable timeframe and the next steps explained to you. If you have used the hotline to report your concerns either anonymously or otherwise, we will contact you via this system. Although you may be requested to provide additional information, you should not undertake your own investigation and Study Group will do this (as applicable to the concern raised). If you have not submitted a report anonymously you are likely to be asked to attend a meeting, or meetings, to discuss your concern. You may bring a colleague or union representative (the "Companion") to any meetings. You and your Companion must respect the confidentiality of your disclosure and any subsequent investigation. You will be provided with updates throughout the process as appropriate, including wherever possible any conclusion following an investigation.

What if you are not satisfied?

If you are not happy with the way in which your concern has been handled or you feel that you have been disadvantaged as a result of having raised your concern, you can raise it with Study Group's Chief Legal & Compliance Officer.

This policy is non-contractual and may be amended at any time by Study Group. Study Group may depart from or vary the associated process depending upon the circumstances of a case. There will be occasions when it is not possible to complete the procedure within your expected timelines.