

# Whistleblowing Policy

**Approved: April 2025 | Review Due: April 2026**

## 1. Introduction

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.

Salt Training Limited ("the Company") is committed to compliance with the Bribery Act 2010. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption.

## 2. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following:

- 2.1 That a criminal offence has been committed, is being committed or is likely to be committed.
- 2.2 That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- 2.3 That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- 2.4 That the health or safety of any individual has been, is being, or is likely to be, endangered.
- 2.5 That the environment, has been, is being, or is likely to be, damaged.
- 2.6 That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- 2.7 [That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.]
- 2.8 [That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.]

they must use the Company's disclosure procedure as set out below.

**Policy Owner: Chair Of Governors**  
**Stage of Approval: Approved**  
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### **3. Disclosure Procedure**

- 3.1 Information which an employee reasonably believes tends to show one or more of the above should promptly be disclosed to Kurt Salter – Managing director, so that any appropriate action can be taken.
- 3.2 If it is inappropriate to make such a disclosure to the manager, the employee should speak to Kurt Salter - Managing Director.
- 3.3 Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.
- 3.4 However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'
- 3.5 For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, employees should speak in confidence to Kurt Salter – Managing Director.

### **4. Governance Oversight, Escalation and Whistleblower Protection**

Salt College's Governance Board provides independent oversight and challenge to the Senior Leadership Team (SLT) and in doing so will ensure that concerns raised under this policy are investigated appropriately, handled fairly and confidentially and without detriment.

Where a concern relates to SLT, the concern may be escalated directly to the Chair of Governors, who will determine appropriate investigation and reporting arrangements. Where required, external independent advice or investigation will be commissioned to ensure objectivity and transparency.

The Governance Board carry out regular analysis and scrutiny of Whistleblowing report themes and outcomes to ensure transparency, accountability and continuous improvement to organisational culture, risk management and compliance.

The College is committed to protecting whistleblowers from detriment or victimisation and will treat all disclosures seriously, promptly and confidentially in line with statutory guidance and best practice

### **13. Contact**

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**Position:**

**Date:**

**Policy Owner: Chair Of Governors**

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