



baseGreen

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WHISTLE BLOWING POLICY



baseGreen



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POL43-WHIST– Whistleblowing Policy Classification

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POL43-WHIST– Whistleblowing Policy Classification

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2. Scope and Application

This procedure applies to all Company personnel and facilities

Failure to comply with the requirements of this procedure may result in investigation and subsequent formal action in line with the Company's Capability and Disciplinary procedures.



3. Responsibilities

CEO

Has overall responsibility for setting and directing: quality, environmental, safety and health, business continuity and information security policy and for ensuring the appropriate resources are available.

Is responsible for setting Company objectives and allocating adequate resources to meet those objectives.

Directors

Are responsible for ensuring that all SMS requirements are established, implemented, maintained and continually improved in accordance with the standards to which the Company subscribes and the legislation relative to the Company's operations.

Is responsible for ensuring that policies, procedures and associated documentation together with the required systems and associated training are developed and cascaded to individual teams.

Are responsible for reviewing, issuing and amending all SMS documentation and for providing information and training at all levels of the Company.

Are responsible for assessing compliance with this procedure during all internal audits.

Document Owners

Are responsible for all SMS documentation relevant to their department or area of work.

Document Authors

Are responsible for ensuring that they follow the style guide and process defined within the procedure when producing new or revising existing, SMS documentation.

All Team Members

Are responsible for ensuring they understand Company policy and procedures and follow the processes at all times.



4. 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.

Basegreen Academy ("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

5. 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:

- That a criminal offence has been committed, is being committed or is likely to be committed.
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- That a miscarriage of justice that 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.



- That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.
- 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.

6. Disclosure Procedure

Information which an employee reasonably believes tends to show one or more of the above should promptly be disclosed to their line manager so that any appropriate action can be taken.

If it is inappropriate to make such a disclosure to the manager, the employee should speak to the Head of Centre / Directors.

Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.

However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'

For further guidance in relation to this matter or concerning the use of the disclosure procedure generally, employees should speak in confidence to Head of centre.



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