

Speak Out (Whistleblowing) Policy

Document approved by	Skipton Building Society board
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Whistleblowing (or “speaking Out”) is ‘making a disclosure in the public interest’ and occurs when a colleague (including contractors, consultants, temporary colleagues), supplier or other third party raise a concern about danger, impropriety or illegality that affects others, for example colleagues, suppliers or members of the public.

The aims of this policy are to:

- (a) encourage colleagues or third parties to feel confident in raising serious concerns and to question and act upon concerns about practice;
- (b) provide avenues for colleagues to raise those concerns and receive feedback on any action taken;
- (c) ensure that colleagues or other third parties raising a concern receive an acknowledgement of the concern when raised, receive an answer about their concerns and that they are aware of how to pursue them if they are not satisfied; and
- (d) reassure colleagues and third parties that they will be protected from possible reprisals (detrement) or victimisation if they have a reasonable belief that they have made any disclosure in good faith.

The Board of Directors of Skipton Building Society (the “Board”) is committed to maintaining the highest standards of honesty, openness and accountability and recognises that individual colleagues and other stakeholders have an important role to play in achieving this goal. In line with that commitment the Board expects colleagues, and other stakeholders that the business deals with, who have serious concerns about any aspect of the Society or its group’s* work to come forward and voice those concerns (Speak Out).

Colleagues and other third-party stakeholders are well placed to be the first to identify if someone inside or connected with the Society or within a group business is potentially acting illegally or improperly. The Board encourages individuals with such knowledge, or reasonable suspicion, to voice those concerns through either the internal or external reporting channels.

Examples of misconduct or malpractice that the Board would expect to be reported are:

- Criminal offences;
- Failure to comply with financial and legal obligations, or regulatory rules;
- Behaviour that harms or is likely to harm the reputation or financial well-being of the Society and its group;
- Wilful or negligent disregard for systems, controls, policies and procedures through the corporate activities of the Society and its group or actions by an individual that may expose: customers or clients to financial loss, unfair treatment or material distress and inconvenience; and/or the Society or its group to operational risk, financial loss, legal or regulatory sanction;
- Disclosure of confidential information to unauthorised third parties;
- Any matter prohibited under the Society’s Anti-Bribery and Corruption Policy that may involve the offering, giving, solicitation or the acceptance of a bribe;
- The Society and its group’s corporate activities or actions by an individual which endanger the health or safety of customers and clients, employees, the public or the Society or its group;
- The Society and/or its group’s corporate activities or actions by an individual which cause damage to the environment;
- Actions which are intended to conceal any of the above.

The Board does not believe that it is in anyone's interest for illegal or improper practices to go unchecked and requires the thorough and fair investigation of any report, taking appropriate action to address the issue.

Safeguards

Harassment or victimisation

The Board is committed to good practice and high standards and wants to support any colleague or third-party stakeholder to speak out. The Board recognises that the decision to report a concern can be a difficult one to make. If what is being reported is true, no one should have anything to fear because of simply doing the right thing.

Harassment or victimisation (including informal pressures) that occurs because of a concern being raised will not be tolerated. Appropriate action will be taken to protect the identity of anyone raising a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that may already affect a colleague or that may be under way in relation to them.

Confidentiality

All concerns will be treated in confidence and every effort will be made to retain the anonymity of the individual speaking out if they so wish. At the appropriate time, however, they may need to come forward as a witness.

Speak Out Champion

The Society's Board has appointed the Chair of the Society's Board (Iain Cummings) as the Speak Out Champion. He is responsible for overseeing the implementation of an effective and accessible procedure to allow colleagues and other third parties to make a Speak Out (whistleblowing) report.

The Speak Out Champion also acts as a backstop in terms of receiving reports directly, where it would not be appropriate to raise a concern with a Nominated Report Recipient. The Speak Out Champion will also be the final arbiter, internally, if an individual isn't satisfied with the way their concern has been handled.

Nominated Report Recipients

The Society publishes a list of named colleagues, independent of immediate line management, to whom colleagues can submit a Speak Out report. This list is set out in full within the Speak Out (Whistleblowing) Procedure document which can be found here.

If an individual feels unable to raise a concern with any of the Nominated Report Recipients, a concern can be raised directly with Iain Cummings as Speak Out Champion.

If someone feels unable to raise a concern internally, or are, for any reason is unhappy with a response or lack of response, concerns can be raised externally. Within the Society and its group concerns can be raised externally via Safecall 24/7 by calling Safecall UK on 0800 915 1571, or online at <https://www.safecall.co.uk/en/file-a-report/>

Alternatively a concern may be raised with another organisation such as Protect.

Concerns can also be raised directly with the Financial Conduct Authority or Prudential Regulation Authority at any point in the process.

Annual Speak Out Report

An annual (consolidated) report for the group as a whole (including Skipton International Limited, Connells Limited and Jade Software Corporation Limited) is presented to the Board on the whistleblowing arrangements and reports received in the year. This report is overseen by the Group Secretary and General Counsel and the Speak Out Champion.

Speak Out process and procedure

This policy is implemented by way of the procedures published for easy access by colleagues (see above). For further information relevant to suppliers this can be found here.

Speak Out procedures are designed to:

- Recognise that anyone may feel apprehensive about “speaking Out”;
- Dispel concerns about either not being taken seriously or consequential bullying or disciplinary action;
- Allow for and encourage individuals to approach senior leaders outside their immediate reporting line;
- Outline what will happen after a report is made;
- Explain that it is sufficient to have reasonable grounds for raising a concern; it is not necessary to have absolute proof of the alleged misconduct or malpractice;
- Recognise that ultimately, a final referral may be made to the Speak Out Champion for any appeal or review of the process; and
- Allow for a concern to be reported anonymously and where this is the case, all reasonable efforts will be made to protect the identity of the individual.

The Board will not tolerate intimidation or failure to investigate any reasonable concerns and expects senior leaders to deal with all reports fairly and properly, making appropriate records of all whistleblowing reports, their investigations and the outcome, even if they are ultimately dealt with via another channel (e.g. under the Resolving Conflict Policy via the People Team).

Where a whistleblower refers their case to an employment tribunal, where all or part of their claim relates to detriment suffered as a result of raising a protected disclosure**, and the Society or a relevant group firm loses, a prompt report will be made by the Society or relevant group firm to the FCA for FCA regulated firms, explaining this.

* (“group” in this context means Skipton Building Society, Skipton Business Finance Limited, Amber Homeloans Limited, North Yorkshire Mortgages Limited. Note: Separate but similar policies are maintained by Skipton International Limited, Connells Limited and Jade Software Corporation Limited)

** A protected disclosure is a disclosure which is made by an individual who reasonably believes that the disclosure is being made in the public interest and that malpractice in the workplace is happening, has happened or will happen.

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V1.4	26.09.2023	M. Borrill	M. Borrill update to reflect appointment of Iain Cummings as Board Whistleblowing Champion