**Global Learning Association: Additional Policies**

This is an additional policy, plus sub-sections adopted by the GLA at the 2023 AGM.

**Financial Governance Declaration**

S**ection 1: Whistleblowing**

The Global Learning Association (GLA) is committed to being open, honest and accountable. It encourages a free and open culture in its dealings between the Executive and Associates. To support this aim it has adopted this policy, written in the context of the Public Interest Disclosure Act 1998 which protects employees who ‘blow the whistle’ on malpractices within their organisation. The concerns which might occasion the implementation of this policy include:

* a criminal offence
* a failure to comply with any legal obligation
* a failure in the protection of children or vulnerable adults
* a miscarriage of justice
* a health and safety risk to an individual
* damage to the environment
* or concealment of the above.

*However, if an individual knowingly or maliciously makes an untrue allegation (e.g. in order to cause disruption), The charity will take appropriate disciplinary action against them. It may constitute gross misconduct. Individuals should also note that they will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence.*

The GLA will designate a member of the Executive at each AGM to handle whistleblowing concerns (the **Whistleblowing Officer**). Individuals are encouraged to raise any concerns in writing where possible, setting out the background and history of their concerns (giving names, dates and places where possible) and indicating the reasons for their concerns.

If an individual raises a concern which they believe to be true, the GLA will take appropriate action to protect the individual from any harassment, victimisation or bullying. The matter will be treated confidentially if the individual requests it and their name or position will be not be revealed without their permission unless the GLA has to do so by law. If in other circumstances the concern cannot be resolved without revealing the individual’s identity, the Whistleblowing Officer will discuss with the individual whether and how to proceed.

How the concern will be dealt with, will depend on what it involves. It is likely that further enquiries and/or investigation will be necessary. The concern may be investigated by the Whistleblowing Officer, the Executive, through the disciplinary process or it may be referred to other agencies.

The GLA will give the individual feedback on the progress and outcome of any investigation wherever possible. If the suspicions are not confirmed by an investigation, the matter will be closed. Colleagues will not be treated or regarded any differently for raising the concern, and their confidentiality will continue to be protected.

*Note 1: Whistleblowing is not the same as making a complaint or raising a grievance, where the individual is saying that they have personally been poorly treated. A whistleblower is usually not directly or personally affected by the concern and therefore rarely has a direct personal interest in the outcome of any investigation into their concerns.*

*The whistleblower raises the concern so that others can address it.*

*Note 2: An effective Whistleblowing Policy is an important component of Risk Management.*

**Section 2: Risk Management and Business Continuity**

The GLA is aware of the five biggest risks that might affect our operation. These are set out below with appropriate mitigation for each one. The Risk Management Process is closely linked with Business Continuity and this is dealt with in a sub-section to this policy.

* 1. Operational risks. These include the illness or otherwise incapacity affecting key members of a contract delivery team. This risk is mitigated by ensuring that operational processes such as project deadlines and procedures are understood by more than one GLA Associate who is competent to take over the day to day running of a contract immediately.
	2. Income risks. The structure of the GLA does not rely on substantial fixed costs such as premises and payroll, therefore income risks are minimised. A sufficient financial reserve is always retained to meet several years of inevitable fixed costs including website maintenance and payments to our auditor.
	3. Cyber security risks. All PCs used by the organisation have up to date virus detection software. Passwords and other essential access information, especially for our bank account, is not shared and we recommend that passwords are changed frequently using standard industry practice to discourage ‘brute force’ attacks. We have completed the Cyber Essentials Questionnaire as advised by the National Cyber Security Centre and now have a recent Readiness Action Plan.
	4. IT risks. The GLA continues to maintain a substantial hard copy record of important documents. In addition, backup copies are made regularly onto hard drives and to the cloud.
	5. Compliance risks. Each GLA Associate is required to sign an agreement which includes a requirement to comply with the necessary professional insurance. In addition, the GLA complies with data gathering legislation and is registered with the appropriate body incurring an annual fee.

Once a risk has been identified the GLA Exec will prioritise the task of finding a solution then monitor the risk until it is deemed to be of no further consequence for the organisation.

**Business Continuity and Disaster Recovery** will necessitate a number of recovery procedures. In these instances (such as fire destroying a key workplace or loss of power or internet access) the Director will implement disaster recovery measures to ensure business continuity. Our Risk Management policy provides us with the guidance to ensure that GLA business can continue from an alternative location and therefore minimise interruption to normal operation. Should the Director not be available this function will be the responsibility of our appointed Deputy Director.

**Section 3: Business Interest**

All Associates are required to declare their interests, and any payments (including, but not limited to, benefits in kind such as gifts, hospitality, travel concessions, preferential treatment, etc) received in connection with their role in where such interests would, or might, conflict with, or otherwise influence their decision-making in respect of the company’s activities.

In order to declare a significant or material conflict of interest Associates are required to inform the Executive Committee at the earliest opportunity.

All declarations of Conflicts of Interest will be recorded in the company's **Register of Conflicts of Interest**, even if, having considered the declaration, the Executive conclude that the declared Conflict of Interest presents no significant risk. Any Associate who is implicated in a Conflict of Interest, whether directly or as a connected person, may not participate in the assessment of the risk but may be called by the Executive undertaking the assessment to provide further details or answer specific questions.

The work of the GLA also requires impartial assessment work relating to schools’ performance in the International School Award. Although no material benefit is involved a school known to an assessor should be excluded from their assessment and transferred to another member of the assessment team. These instances do not fall into the categories described in the first paragraph of this policy.

**Section 4: Gifts and Hospitality**

This GLA policy sets out the procedure GLA Associates must follow when giving or receiving gifts and hospitality.

Associates must declare all offers of gifts and hospitality, all such offers must be declared whether accepted or declined. To this end the GLA has created a **Gifts and Hospitality Register.** The register is maintained by the GLA Executive and gives details of:
- Description of Gift/Hospitality received
- Value £ (Estimate if unknown)
- Reason given for providing gift/hospitality
- Date(s)

This Policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the GLA Associate. In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances.

Associates may retain all gifts valued at £40.00 or under, for gifts exceeding a value of £40.00 Associates should donate the gift to the UK Global Learning Association (a registered charity). Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, (this does not need to be declared on the register except where a gift was received.