



WHISTLEBLOWING POLICY OF Small City Big Personality

Commitment

1. Small City, Big Personality is committed to the highest standards of ethical journalism. In line with that commitment we expect employees, contributors and others that we deal with, who have serious concerns about any aspect of the Small City, Big Personality work, to come forward and voice those concerns. The best way to raise a concern is to do so openly by directly disclosing to **Small City Big Personality**. In circumstances where this is not practical or appropriate, employees and contributors are encouraged to contact the confidential IMPRESS whistleblowing hotline. Small City, Big Personality shall publicise the contact details of the hotline to all its employees and contributors.
2. This policy applies to all employees and contributors, paid or unpaid, temporary or permanent.

Policy Aim

3. The aim of this policy is to provide an avenue for employees and contributors to raise concerns in confidence and to receive feedback on any action taken. Small City, Big Personality guarantees to protect all whistle blowers from possible reprisals, victimisation or sanction if a disclosure has been made in good faith. For the avoidance of doubt, this includes the provision that Small City, Big Personality will not take any action to the detriment of anyone for using the IMPRESS whistleblowing hotline or declines to breach the Standards Code adopted by Small City, Big Personality as part of its compliance with the IMPRESS Regulatory Scheme.

Examples of Concerns

4. The following are examples of concerns that a whistle blower may choose to raise.
 - Conduct which is an offence or a breach of the law
 - Conduct which is a breach of the Standards Code
 - Conduct which encourages others to breach the Standards Code
 - Other unethical conduct which undermines the principles and spirit of the Standards Code

Safeguards

5. Small City, Big Personality recognises that the decision to report a concern can be a difficult one to make. An individual who provides information which is true or which they believe to be true, shall have nothing to fear because they will be acting in accordance with the policy of [Name of Publisher / Publication]. Small City, Big Personality will not tolerate any harassment or victimisation of a whistle blower and will take appropriate action to protect an employee or contributor where they raise a concern in good faith.
6. Where an allegation is made in good faith which is subsequently unconfirmed, no action will be taken against the whistle blower.

7. If, however, a malicious allegation is made and it is proven that the whistle blower knew the information to be untrue at the time the concern was raised then Small City, Big Personality reserves the right to take disciplinary against the whistle blower.

Confidentiality

8. All concerns will be treated in confidence and every effort will be made not to reveal the identity of the whistle blower, unless the whistle blower consents to make their identity known. At the appropriate time, however, a whistle blower may be asked to come forward as a witness before a relevant adjudication panel, tribunal or court of law.
9. Please note that whistle blowers must:
 - disclose the information in good faith.
 - believe it to be substantially true
 - not act maliciously or make false allegations
 - not seek any personal gain

How to raise a concern?

10. The best way to raise a concern is to do so openly so that Small City, Big Personality can address the issue without delay and can protect the individual making the disclosure. In the first instance, concerns should be raised with Nicola Martin of **Small City Big Personality**.
11. It is recognised, however, particularly where concerns are very serious, that the whistle blower may prefer to disclose to a third party who can provide advice and information and who has powers to independently investigate the concerns or allegations.
12. Small City, Big Personality is regulated by IMPRESS and all employees and contributors are encouraged to contact the confidential IMPRESS whistleblowing hotline if they have concerns about serious potential breaches of the Standards Code. This is operated by the whistleblowing charity Public Concern at Work.

IMPRESS whistleblowing hotline

0800 221 8548

c/o Public Concern at Work

www.pcaaw.co.uk