

Public Interest Disclosure ('Whistleblowing') Policy and Procedures

1. ABOUT THIS POLICY

- 1.1 The University of Reading is committed to conducting its business with honesty and integrity and in a responsible manner, taking into account the requirements of the funding bodies and the standards in public life set out in the report of the Committee on Standards in Public Life. We expect all staff to maintain high standards, including in accordance with the University's Instruments of Governance and its policies and procedures. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. As the University will only be able to address issues and risks when it is informed of and made aware of such problems, individuals must feel able to report any suspicious activity and suspected wrongdoing. A culture of openness and accountability is therefore essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 The aims of this policy are:
- (a) To encourage staff and students to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - (b) To provide staff and students with guidance as to how to raise those concerns.
 - (c) To reassure staff and students that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy is not designed to provide a route through which the financial or business decisions taken by the University may be questioned; nor may it be used to reopen matters that have been dealt with under harassment, grievance, disciplinary or complaint procedures; nor should it be used as an alternative to those procedures in respect of matters which would more appropriately be considered under them. Action taken under this policy may of course lead to the invocation of those policies.
- 1.4 This policy applies to all employees, officers, consultants, self-employed contractors, volunteers, interns, casual workers and agency workers. The University has decided that it shall also apply to students and members of the University Council.
- 1.5 This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Protect. This policy does not form part of any contract of employment, contract between any student and the University or any other contract to provide services and the University may amend it at any time.

2. PERSONNEL RESPONSIBLE FOR THE POLICY

- 2.1 The University's Council, acting through the Audit Committee, has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 2.2 The University Secretary acts as the University's Whistleblowing Officer, and has day-to-day operational responsibility for this policy, and you should refer any questions about this policy to them in the first instance. The University Secretary must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 2.3 The Whistleblowing Officer, in conjunction with the Audit Committee should review this policy from a legal and operational perspective every three years.
- 2.4 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer who will involve the Audit Committee where appropriate.

3. WHAT IS WHISTLEBLOWING?

- 3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
 - (a) criminal activity;
 - (b) failure to comply with any legal or professional obligation or regulatory requirements;
 - (c) miscarriages of justice;
 - (d) danger to health and safety;
 - (e) sexual harassment;
 - (f) damage to the environment;
 - (g) bribery under our Anti-corruption and Bribery Policy;
 - (h) facilitating tax evasion contrary to our Criminal Facilitation of Tax Evasion Policy;
 - (i) financial fraud or malpractice or impropriety;
 - (j) negligence;
 - (k) failure to comply with the Charter, Ordinances or Regulations of the University;
 - (l) breach of our internal policies and procedures;
 - (m) unauthorised disclosure of confidential information;
 - (n) academic malpractice;
 - (o) conduct likely to damage our reputation or financial wellbeing; or

(p) the deliberate concealment of any of the above matters.

- 3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the University's activities (a **whistleblowing concern**) you should report it under this policy. You should not be concerned about facing any repercussions as a result of raising a genuine concern. There is nothing wrong in reporting something that might later turn out to be a genuine mistake or misunderstanding.
- 3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure, Harassment and Bullying Procedure or the Student Complaints Procedure as appropriate. If, however, the above policies are not being acted on or followed properly, the Whistleblowing route may be used as an alternative to report such complaints.
- 3.4 If a complaint relates to your own personal circumstances but you also have wider concerns regarding one of the areas set out at paragraph 3.1 above (for example, a breach of our internal policies), you should discuss with the Whistleblowing Officer which route is the most appropriate.
- 3.5 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

4. CONFIDENTIALITY

- 4.1 The University hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every reasonable effort to keep your identity secret. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to make a statement as part of the evidence required. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 4.2 The University does not encourage staff to make disclosures anonymously, although we will make reasonable efforts to investigate anonymous disclosures. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 5 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from the Employee Assistance Programme or Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this policy.

5. RAISING A WHISTLEBLOWING CONCERN

- 5.1 The University hopes that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and

effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

- 5.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- (a) The Whistleblowing Officer;
- (b) Our dedicated email address;
- (c) The Chair of the Audit Committee;
- (d) The University's External Auditors.

Contact details are set out at the end of this policy.

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

- 5.3 A written summary of your concern will be made, and you will be provided with a copy of it after the meeting. The Whistleblowing Officer or the person appointed to investigate your concerns will also aim to give you an indication of how they propose to deal with the matter.

6. INVESTIGATION AND OUTCOME

- 6.1 Once you have raised a concern, an initial assessment will be carried out to determine the scope of any investigation. You will be informed of the outcome of the assessment. You may be required to attend additional meetings in order to provide further information.
- 6.2 In some cases, the University may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the University to minimise the risk of future wrongdoing.
- 6.3 The Whistleblowing Officer and/or the person investigating will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent them giving you specific details of the investigation, its outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 6.4 If it is concluded that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

7. IF YOU ARE NOT SATISFIED

- 7.1 While the University cannot always guarantee the outcome you are seeking, it will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help the University to achieve this.

- 7.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 5. Alternatively, you may contact the Chair of the Audit Committee, the President of the Council or our external auditors. Contact details are set out at the end of this policy.

8. EXTERNAL DISCLOSURES

- 8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the University. In most cases you should not find it necessary to alert anyone externally.
- 8.2 The law recognises that in some circumstances it may be appropriate for you to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. It also has a list of prescribed regulators for reporting certain types of concern. Its contact details are at the end of this policy.
- 8.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first, in line with this policy. You should contact your line manager, the University Secretary or one of the other individuals set out in paragraph 5 for guidance.

9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

- 9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. The University aims to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer or your Human Resources Partner immediately. If the matter is not remedied, you should raise it formally using the Grievance Procedure.
- 9.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

10. CONTACTS

Whistleblowing Officer	whistleblowinghotline@reading.ac.uk

Chair of the Audit Committee via the Secretary to the Audit Committee	governance@reading.ac.uk
President of the Council via the Secretary to the Audit Committee	governance@reading.ac.uk
University's internal and external auditors	governance@reading.ac.uk
Employee Assistance Programme	0800 085 1376 assist@cwicwellbeing.com
Protect (formerly Public Concern at Work) – independent whistleblowing charity)	Helpline: 0203 117 2520 https://protect-advice.org.uk/

Version	Keeper	Reviewed	Approved by	Approval date
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