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Whistleblowing Policy

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Amendment History:

Version Number:	Effective Date:	Summary of Amendments:	Author:
V1.0	October 2019	Policy established.	Sharon Tuersley, Secretary to Council
V2.0	March 2023	Reviewed.	Chris Twine, Secretary to Council
V2.1	23/02/2024	Reviewed and amended in line with Internal audit recommendations.	Chris Twine, Secretary to Council
V2.2	14/06/2024	Transferred into new policy format and EIA conducted.	Emma Tew, Assistant Registrar (Governance)

1. Introduction

- 1.1 The University is committed to honesty, integrity, openness and accountability and we expect our students, staff and our community as a whole to maintain high standards, in accordance with our policies and procedures. The University understands, however, that all organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or addressing them when they do occur.
- 1.2 [The Public Interest Disclosure Act 1998](#) gives legal protection to staff (including employment agency workers and those on work experience) against being dismissed or penalised by employers as a result of disclosing information which, in the reasonable belief of that member of staff, is in the public interest to disclose and tends to show one or more specified types of malpractice, wrongdoing or dangers. These disclosure are commonly known as 'whistleblowing'.

2. Scope

- 2.1 This Policy applies to all students, employees, and those who are engaged to work for the University and includes apprentices, interns, agency workers and those with honorary contracts. The Policy also applies to any registered students and members of University bodies such as the Council.
- 2.2 **The aims of this Policy are to:**
- Encourage students, staff, or anyone contractually connected to the University, to report concerns about a suspected wrongdoing as soon as possible, in the knowledge that concerns will be taken seriously, investigated appropriately, and confidentiality respected.
 - Reassure all that genuine concerns can be raised without fear of reprisals, even if they turn out to be mistaken.

2.3 Type of concerns to be reported:

Whistleblowing is the disclosure of information that relates to suspected wrongdoing, malpractice or dangers at work or study. This may include:

- Breaches of legal, professional or statutory regulation e.g., Health and Safety obligations of the University.
- Breaches of agreed ethical protocols.
- Criminal offences.
- Environmental harm.
- Financial or non-financial maladministration, malpractice, bribery or fraud.
- Academic malpractice.
- Deliberately concealing information demonstrating that one or more of the above are taking place.

It may be that your concern is most effectively dealt with by an alternative University Policy or Procedure. The decision tree at Appendix 1 can help you to assess this.

2.4 Raising a concern externally:

The aim of this Policy is to provide an internal mechanism to report, investigate and remedy any wrongdoing in the workplace. In most cases, it should not be necessary to alert anyone externally and all reasonable measures should be taken to use internal procedures. However, it remains lawful to raise concerns externally in addition or as an alternative to the University's own policy. The University strongly encourages its community to seek advice about whistleblowing, and the extent of the protection available for whistleblowers, before reporting a concern to anyone externally.

The independent whistleblowing charity, [Protect](#) (formerly Public Concern at Work), operates a confidential helpline which provides free, independent and confidential advice. The UK helpline number is 020 3117 2520.

3. Responsibilities

Role	Responsible for
All students and employees	<ul style="list-style-type: none">➤ Familiarising themselves with the Whistleblowing Policy and Standard Operating Procedure.➤ Raising whistleblowing concerns in accordance with 2.3.
Heads of Department/ Personal Tutors	<ul style="list-style-type: none">➤ Supporting their students and employees in raising whistleblowing concerns.➤ Facilitating the procedure outlined in the Whistleblowing Standard Operating Procedure.
Secretary to Council	<ul style="list-style-type: none">➤ Duties commensurate to their role as the Designated Whistleblowing Officer.➤ Maintaining the Whistleblowing Policy and Standard Operating Procedure.
Audit & Risk Committee (under the ultimate oversight of the University Council)	<ul style="list-style-type: none">➤ Oversight of the Whistleblowing Policy, Procedures and Disclosures as per the Scheme of Delegation.

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Responsible	Secretary to Council
Accountable	Audit & Risk Committee
Consult	Policy Oversight Group > University Executive Board
Inform	All students and employees

4. Procedure

- 4.1 Please refer to the [Whistleblowing Standard Operating Procedure](#), which provides step-by-step guidance on how to raise a whistleblowing concern (via the dedicated [web report form](#)) and the subsequent investigation process.
- 4.2 It should be noted that:
- **Deterring reporting parties from raising concerns or victimising them (or their supporters) for doing so amounts to misconduct and could lead to disciplinary action.**
 - **If a reporting individual discloses information that alleges malpractice, which is not then confirmed by subsequent investigation, no detrimental or disciplinary action will be taken against them.**
 - **However, where a reporting individual is found to have made malicious or vexatious allegations, particularly if they persist in doing so, action may be taken in line with the University staff or student disciplinary procedures.**
- 4.3 All queries related to whistleblowing should be directed to: whistleblowing@warwick.ac.uk

5. Confidentiality

- 5.1 The University hopes that everyone will feel able to voice concerns openly under this Policy; however, should anyone wish to raise a concern confidentially, the University will ensure that it does not reveal a reporting individual's identity to anyone, other than those involved in investigating the concerns. If it becomes necessary for anyone else to know a reporting individual's identity in order to adequately investigate the concern, the University will discuss this with them first.

5.2 Raising a concern anonymously:

Raising a concern anonymously potentially makes it more difficult to investigate it properly, as more information may be required; however, if a reporting individual is concerned about possible reprisals if their identity were to be revealed, they should still report their concern to the Secretary to Council (via the dedicated [web report form](#)) who will consider whether it can be appropriately considered and investigated anonymously.

6. Support

- 6.1 It is understandable that individuals may be worried about possible repercussions if they were to raise a concern. The law provides protection for whistleblowers who report genuine concerns, to ensure they are not treated unfairly as a result of making a public interest disclosure. The University encourages openness and will support you if you raise a genuine concern under this Policy, even if it turns out to be mistaken.

7. Associated Documents

- [The Public Interest Disclosure Act 1998](#)
- [Whistleblowing Standard Operating Procedure](#)
- [Whistleblowing Web Report Form](#)
- [Protect](#) (the UK's whistleblowing charity)

Appendix 1 – Decision Tree

It may be that your concern is most effectively dealt with by an alternative University Policy or Procedure. The decision tree below can help you to assess this.

