

Office of the Chief Strategy Officer and University Secretary

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. A culture of openness and accountability is 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 covers all employees, officers, consultants, 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 Public Concern at Work. This policy does not form part of any employee's contract of employment or the contract between any student and the University, 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 this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 2.2 The Director of Internal Audit acts as the University's Whistleblowing Officer, and has day-to-day operational responsibility for this policy, and 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 once a year.
- 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 Audit Committee.

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) damage to the environment;
 - (f) bribery under our Anti-corruption and Bribery Policy;

- (g) financial fraud, malpractice or impropriety;
- (h) negligence;
- (i) Failure to comply with the Charter, Ordinances or Regulations of the University;
- (j) breach of our internal policies and procedures;
- (k) academic malpractice;
- (l) conduct likely to damage our reputation; or
- (m) 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.

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.

3.4 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. 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 Public Concern at Work, the

independent whistleblowing charity, which offers a confidential helpline. Its 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 or the University Secretary. 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 or the University Secretary 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, David O'Connor (Director of Internal Audit Services) d.a.oconnor@reading.ac.uk or 0118 378 8303.
- (b) Our confidential telephone hotline on 0118 378 6353.
- (c) The Chair of the Audit Committee . care of Louise Sharman, the secretary to the Audit Committee, l.v.sharman@reading.ac.uk or [number] .

Further contact details are set out at the end of this policy.

5.3 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.

5.4 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 we will also aim to give you an indication of how it is proposed 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, its likely timescale and its outcome. 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 the chairman of the Audit Committee or the President of the Council (both via l.v.sharman@reading.ac.uk).

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 employees and workers 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, Public Concern at Work, 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. 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. 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	David O'Connor [0118 378 8303] [d.a.oconnor@reading.ac.uk]
The University Secretary	Dr Richard Messer [0118 378 8531] [r.j.messer@reading.ac.uk]
Chair of the Audit Committee via the secretary to the Audit Committee	Louise Sharman [0118 378 6180] l.v.sharman@reading.ac.uk
President of the Council via the University Secretary	Dr Paul Preston
Whistleblowing hotline (from 9am to 5pm)	Telephone +44 (0)118 378 6353 E-mail whistleblowinghotline@reading.ac.uk
Employee Assistance Programme	0800 085 1376
Public Concern at Work	Helpline: (020) 7404 6609

(Independent whistleblowing charity)

E-mail: whistle@pcaw.co.uk

Website: www.pcaw.co.uk