

Office of the Chief Strategy Officer and University Secretary

Public Interest Disclosure ('Whistleblowing') Policy and Procedures

1. ABOUT THIS POLICY

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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 the University's policies and procedures.

- 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 0118 378 6180 .

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

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