

Raising serious concerns: Whistleblowing Policy

1 Introduction and purpose

- 1.1 The university is committed to conducting its business with honesty and integrity, and expects all staff and governors to maintain the highest standards of ethical behaviour and professional conduct in accordance with the university's policies and procedures, regulations and codes of conduct (see [Appendix B](#)). However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct ('malpractice').
- 1.2 We recognise that it is often individual staff members who are the first to notice potential malpractice taking place within the university. We know that our staff are a valuable source of information and can be effective in helping us build assurance that we are meeting the high standards of ethical and professional conduct we expect of all staff and governors. Therefore, this policy aims to:
 - 1.2.1 Encourage and support staff to report concerns (sometimes referred to as a "disclosure" or "blowing the whistle") as soon as possible, in the knowledge that they will be taken seriously and their concerns investigated as appropriate.
 - 1.2.2 Provide staff with a mechanism to raise concerns in confidence within the university.
 - 1.2.3 Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
 - 1.2.4 Balance the need to protect those who raise concerns against the need to protect staff and governors against untrue allegations that are made in bad faith and which can cause serious difficulties for innocent people.
- 1.3 The policy has been implemented following consultation with the recognised unions. This policy does not form part of any employee's contract of employment and the university may amend it at any time.

2 Scope

- 2.1 This policy applies to all employees of the university together with other categories of worker at the university such as agency workers (including Unitemps), consultants, contractors, casual and freelance workers. It also applies to volunteers including members of the Board of Governors.
- 2.2 This policy should be used to disclose information which relates to suspected malpractice or risks / dangers at work. Such

- Unauthorised disclosure of confidential information including any breach of data protection requirements;
- Failure to comply with a statutory duty or regulatory or professional obligation or with the university's codes, procedures or regulations (see [Appendix B: Relevant policies, procedures and regulations](#));
- Failure to report a 'reportable event' as defined by the Office for Students' (OfS) regulatory framework;
- Endangering health and safety; which has occurred, is occurring or is likely to occur;
- Safeguarding concerns including but not limited to concerns about harm or risk of harm to children, vulnerable adults or to animals;
- Concerns about slavery or human trafficking;
- Endangering the environment, which has occurred, is occurring or is likely to occur;
- Miscarriage of justice, which has occurred, is occurring or is likely to occur;
- Conduct likely to damage the university's reputation or financial wellbeing;
- Attempts to conceal information relating to any of the above.

2.3 The above list is not intended to be exhaustive. Individuals are encouraged to raise any concerns about matters which they consider are potentially damaging to the university or harmful to individuals, even if those concerns do not clearly fit within one of the identified categories. If in doubt, it is better to raise your concern. The university would rather be aware of the matter you are concerned about and be able to act upon it as appropriate, than have a potentially serious matter going unreported because of uncertainty about whether it was 'in scope' of this policy. If you are unsure whether your concern is appropriate for this policy, you may seek advice from your line manager or from one of the identified Recipients at 7.6 in this policy.

2.4 The policy is not designed to allow individuals to:

- 2.4.1 question legitimate financial, business or managerial decisions taken by the university;
- 2.4.2 seek reconsideration of any matters that have already been addressed under the grievance or disciplinary procedures; or
- 2.4.3 raise concerns relating to their own personal circumstances.

2.5 Where an individual raises a concern under another university policy (e.g. the **Grievance Procedure**) which highlights wider concerns that would fall within the scope of this policy e.g. concerns about health and safety breaches, the university reserves the right to investigate and, where necessary, take appropriate action in accordance with its policies (i.e. 5.2(e), 5.3, 5.7(d), 1.2(T)(b)), 3.37(da)-6(t)7w(r)16.1(e)1.9ssu)7w(e)1.

2.7 Employees raising concerns which are within the scope of this policy will still be

6 Anonymous disclosures

6.1 Anonymous disclosures are not encouraged. Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the university. In exercising this discretion, the university will consider:

- the seriousness of the issues raised including but not limited to whether it amounts

15 Monitoring and reporting on the operation of this policy

- 15.1 The Head of Legal Services will keep a confidential record of all disclosures and any subsequent actions taken and will retain such reports for seven years. The information will be used to report to the Audit Committee the outcomes of any investigation, in detail where the issue falls within its terms of reference, and in summary in other cases as a means of allowing the Committee to monitor the effectiveness of the policy.
- 15.2 The Audit Committee will report annually to the Board of Governors on the operation of this policy.

Appendix A: Contacts and further information

Protect (formerly Public Concern at Work) - the whistleblowing charity
<http://www.pcaw.org.uk>

Whistleblowing Advice Line: 020 3117 2520

UK advice line: whistle@protect-advice.org.uk

Acas (Advisory, Conciliation and Arbitration Service)

<http://www.acas.org.uk/>

Gov.uk

<https://www.gov.uk/whistleblowing/what-is-a-whistleblower>

List of prescribed persons: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

[Employee Assistance Programme](#)

24 hour Counselling and Information Services.

This benefit is available to all staff and their dependants. The EAP offers you immediate access to 24-hour telephone counselling and legal and financial information services, provided by an independent health and wellbeing provider, Health Assured, and thereby extends the support that we are able to offer.

Appendix B: Relevant policies, procedures and regulations

The standards of conduct and behaviour expected of staff and governors are set out in the university's policies, procedures, regulations and codes of conduct. The following are particularly relevant to the types of concern that might be raised under this policy, in addition to the provisions contained within employees' contracts of employment:

- Code of Conduct for Staff and Governors at DMU
- Policy on Countering Fraud, Bribery and Money Laundering
- Financial Regulations
- Health and safety policies and procedures
- Safeguarding policy and procedure
- Equality and diversity policies