

# PUBLIC INTEREST DISCLOSURE

(Commonly referred to as Whistleblowing Po)icy

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# POLICY and PROCEDURES

Responsibility of	Secretary to the Counci
ReapprovalDate	:µv 20îí
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Approved by	Audit Committee
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### 3 SCOPE OF THE POLICY

Other than in exceptionadircumstancesal disclosures should be raised internally in the first instance. This Policy covers disclosures of information which, in the reasonable belief of the person making the disclosure, concern malpractice / impropriety that has been being or is likely to be commend within RVC educational and business activities.

Information that qualifies as a disclosure under this Policy would cover one or more of the following:

- x Financiabr non-financial malpractice or impropriety or fraud; \*
- x Failure to comply with a legabligation or with Statutes and Regulations of the Zs;
- x Miscarriage of Justice;
- x Threat to an individual's health & safety;
- x Damage to the environment;
- x Failure to safeguard RVC assets properly;
- x Academicor professionalmalpractice; †
- x Attempts to suppress or conceal information relating to any of the above.

† Not covered elsewhere e.gnder RVC Professional Requirements or Profess**Staa**ddards procedures or by RCVS codes of practice. The Z s has separate Policies and procedures for dealing with allegations of Research Misconduct (including piracy, plagiarism, deliberate deception and breaches of the GosseaRde Practice Guide) and with Academic Misconduct by students.

#### **ð X GENERAL PRINCIPLES OF THE POLICY**

- x All qualifying disclosures wbleinvestigated in a fair and proper manner and as sensitively and speedily as possible;
- x The Z s will not tolerate the À ] š ] u ] Ì š ] } v of or retribution against anyone mak**idisc**togeneuine even if they are ultimately shown to be mistaken; \*\*
- x A person making a disclosure will be made aware of who is handling the matter and will be advised of progress at appropriate stages;
- x The right to natural justice (including the right of response to allegations) of those accused of mal us.aytTw (t)Tj6 Twogress/ improprietyw n7 nb153 Tw ( )Tj 0.033 Tw [(wil)-0.525 (l al)-0.525 (so)]TJ ·

### Confidentiality

During initial consideration of a disclosure, **ad** asonable steps will taken neither to breach confidentiality nor to reveal the identity of the Discloser untilformal investigations begun. Thereafter, reasonable steps will be taken to maintain confidentiality in so far as so doing does not hind **tenst** at a fair investigation and is consistent with the rights of the person(s) being investigated to be aware of the nature of the allegations against them. Where the investigation process may reveal the source of the information, prior to this occurring the investigator will discuss the issue with the Disc**torse** the latter, if still concerned about potential repercussions if their identity is revealed, should contact **ther** ary to the Council (or the Principal if the Secretary is the subject of the disclosure) so that appropriate measures to maintain confidentiality can be considered.

### Anonymous Allegations

Despite the protection offered under this Policity person decides to make an anonymous disclosure, anonymous allegations may be considered only after due regard to:

] X the seriousness of the issue(s) disclosed;

]] Xthe credibility of the concern of the anonymous Discloser;

]]] Xhe likelihood of confirming the allegation from other credible sources;

] À Xthe practicality of conducting a proper investigation.

### • Unfounded or Fale Allegations

If a person makes a disclosure but after investigation the allegation proves to be unfounded, no action will be taken against them and any subsequent vict**iation** of the person will be considered to be a serious disciplinary offence.

Disciplinary action is likely to be taken against a person if, as revealed by investigation, they have made a disclosure for frivolous/exatious or malicious reasons, particularly if they persist in making them. This would include disclosure for persongain or where internal processes have been unreasonably bypassed.

External Disclosures

If an individual makes an externatisclosure / complaint to any prescribed body or person (see

Allogation relator to:	Disclosure to be made	Disclosure to be	Decision on action to be	
Allegation relates to:			Decision on action to be	
	to:	advised to	made in consultation with/	
			by:	
Fellow Student	Senior Tutor	Academic Registrar	Principal/ Sec. to the Counci	
President / Officeof the Sš μ Všv] } v	Academic Registrar	Principal	Secretary to the Council	
Lecturer /Colleague	Head of Department	Principal	Secretary to the Council	
Head of Department	Principal	Secretary to the Council	Chair of Audit Committee	
Director of Finance	Secretary to the Council	Principal	Chair of Audit Committee	
Secretary to the Council Deputy or VicePrincipal	Principal	Chairman of Counci	Chair of Audit Committee	
Principal	Secretary to the Council	Chairman of Counci	Chair of Audit Committee	
Council Member	Secretary to the Council	Chairman of Counci	Chair of Audit Committee	
Chairman of Council	Secretary to the Council	Vice Chair of Counc	I Chair of Audit Committee	
Chair of Audit Committee	Secretary to the Council	Principal	Chairman of Council	

Table 1

In the event that annidividual fears that their position may be jeopaired or when the disclosure channels shown above are impropriate, he matter should be disclosed in witing to the Director of Human Resources who will consult an appropriateon person based on the facts of the disclosure of the matter is so serious that it cannot be discussed with may of the people identified above to whom disclosure bould be made the Discloseshould contact the Chair of the Audit Committee.

In all cases involving financial malpractice, the Secretary to the Council shall **base** inconsultation with the Principal as the designated counting officer' for the Z s's public funding and with the Director of Finance. In the event that the Secretary to the Council is the subject of the allegation, action shall be taken by the Principal.

The Secretary to the Council will be esponsible for keeping the Principal / Chair of Council / Chair of Audit Committee informed as a propriate.

## ó X PROCESS AFTER DISCLOSURE MADE

The person to whom the disclosure is made will consult as appropriate (see **Tablee**) and it will be determined (i)whether there is a prima facie case to answer and while there an investigation should be conducted and fiso, e

Ultimately it is the Scretary to the Council, ho is accountable for the effective management of disclosures that are made under this Policy \* and will provide initial guidance and assistance on W

- x managing the process and deciding the appropriate action to;take
- x identifying a Designated Person investigate the disclosure;
- x setting theterms of reference for the investigation and the scope of the final report.

\* Unless the Secretary is the subject of the disclosure, in which case the Principal assumes accotont the disclosure particular disclosure

To ensure independence, any investigations will not be performed by the person who will have to reach a final decision on the disclosure

#### Internal Investigations

The Secretary to the Council (see \* above) has discretion to take advice and to delegate the responsibility for investigating disclosures to another appropriate officer of the Z sC. In the case of financial malpractice / impropriety, any internal investigation required will normally be undertaken by the Internal Auditternal Investigations wilbe undertaken as rapidly as possible and should be completed within three months and the process exceed this the frame, then the Designated Person must (a) inform the Chair of the Audit Committee and (b) advise the Discloser accordingly.

#### • Progress Update for the Discloser

As soon as possible after disclosuthe; Discloser wibe informed about what action, if any, is to be taken and will be given the name and contact details of the Designated Person. Periodic updates will be provided by the Designated Person as appropriate.

#### •Appeal Process

In the event that no action is to be taken or the allegation has not been resolved by the above process, the Discloseshould be allowed to remake the adjustion to a higher authority as per Table 2 below:

Original Allegation	Appeal to be		Appeal Process	
relates to:	made to:			
Fellow Sudent				
President /SU Officer				
Lecturer / Teaching	Chair of		1) AppealGroup to be convened with individuals	
Colleague	the Council		(including an external Member of Council) have no	
Head of Department			previous connection to the Disclosure and a Hearing to b	
Director of Finance			undertaken.	
Secretary to the Council	Chair of			
Vice Principal	the Council		2) Action, if any, to be taken as agreed by the Appeal	
Principal	Chair of		Group	
Council Member	the Council			
			3) Advise the Appellant (Discloser) of outcome of the	
	Chair of		Appeal process.	
Chair of the Council	Audit			
	Committee		AppealProcess to be Minuted by Director Human	
Chair of Audit Committee			Resources or nominee	

Chair of Audit Committee

# 11. CONTACT NUMBERS

Position	Name	Contact Eµu Œ		
Secretary to the Council	Mr Ian Darker	=ðð ~ì∙íóìó ò=ò6322		
Principal	Professor Stuart Reid	=ððð ∼ì•69160ð(Principal's Office)		
Chairman of Audit Committee	M•uvWCE,]	P7/iP2]^∕v•CE šš}OEµÇv }⊛ = }À	•	
Chairman of Council	Œ}v •• z}µvP}(K	os]^^}vOE š ΟΕÇ š} }μι	/]0	~ •
Director of Human Resources	MrsCindy Pike	=ðð ∼ì•í <b>637</b> 8 òò		
Academic Registrar	Ms Emma Burchfield	=ðð ~ì•íóìó òòñîí	ì	