



PUBLIC INTEREST DISCLOSURE

(Commonly referred to as Whistleblowing Policy)

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POLICY and PROCEDURES

Responsibility of	Secretary to the Council
ReapprovalDate	: μ v 20 î í
Review Date	June 202 ō
Approved by	Audit Committee
Author	D.HardymarRice

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3 SCOPE OF THE POLICY

Other than in exceptional circumstances, all 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, is being or is likely to be committed within RVC educational and business activities.

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

- x Financial or non-financial malpractice or impropriety or fraud; *
- x Failure to comply with a legal obligation or with Statutes and Regulations of the Z s ;
- 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 Academic or professional malpractice; †
- x Attempts to suppress or conceal information relating to any of the above.

† Not covered elsewhere e.g. under RVC Professional Requirements or Professional Standards 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 Good Practice Guide) and with Academic Misconduct by students.

GENERAL PRINCIPLES OF THE POLICY

- x All qualifying disclosures will be investigated in a fair and proper manner and as sensitively and speedily as possible;
- x The Z s will not tolerate the Å] š] u] ì š] } v of or retribution against anyone making a disclosure, 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, ~~all~~ reasonable steps will be taken neither to breach confidentiality nor to reveal the identity of the Discloser until formal investigations are begun. Thereafter, reasonable steps will be taken to maintain confidentiality in so far as so doing does not hinder or frustrate 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 Discloser. ~~and~~ the latter, if still concerned about potential repercussions if their identity is revealed, should contact ~~the~~ the Secretary 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 Policy, a person decides to make an anonymous disclosure, ~~such~~ anonymous allegations may be considered only after due regard to:

- X the seriousness of the issue(s) disclosed;
-] X the credibility of the concern of the anonymous Discloser;
-]] X the likelihood of confirming the allegation from other credible sources;
-] A X the practicality of conducting a proper investigation.

- Unfounded or False 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 victimisation 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, vexatious or malicious reasons, particularly if they persist in making them. This would include disclosure for personal gain or where internal processes have been unreasonably bypassed.

- External Disclosures

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

Allegation relates to:	Disclosure to be made to:	Disclosure to be advised to	Decision on action to be made in consultation with/ by:
Fellow Student	Senior Tutor	Academic Registrar	Principal/ Sec. to the Council
President / Office of the SŠ μ VŠ] } 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 Vice Principal	Principal	Chairman of Council	Chair of Audit Committee
Principal	Secretary to the Council	Chairman of Council	Chair of Audit Committee
Council Member	Secretary to the Council	Chairman of Council	Chair of Audit Committee
Chairman of Council	Secretary to the Council	Vice Chair of Council	Chair of Audit Committee
Chair of Audit Committee	Secretary to the Council	Principal	Chairman of Council

Table 1

In the event that an individual fears that their position may be jeopardised or when the disclosure channels shown above are inappropriate, the matter should be disclosed in writing to the Director of Human Resources who will consult an appropriate senior person based on the facts of the disclosure. If the matter is so serious that it cannot be discussed with any of the people identified above to whom disclosure could be made, the Discloser should contact the Chair of the Audit Committee.

In all cases involving financial malpractice, the Secretary to the Council shall consult in consultation with the Principal as the designated 'accounting 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 responsible for keeping the Principal / Chair of Council / Chair of Audit Committee informed as appropriate.

6 X PROCESS AFTER DISCLOSURE MADE

The person to whom the disclosure is made will consult as appropriate (see Table 1) and it will be determined (i) whether there is a prima facie case to answer and (ii) whether an investigation should be conducted and if so, by whom.

Ultimately it is the Secretary to the Council who 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 to investigate the disclosure;
- x setting the terms 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 accountability for the 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 Auditor. Internal Investigations will be undertaken as rapidly as possible and should be completed within three months. Should the process exceed this time 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 disclosure the Discloser will be 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 Discloser should be allowed to remake the allegation to a higher authority as per Table 2 below:

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

Chair of Audit Committee

11. CONTACT NUMBERS

Position	Name	Contact E μ u CE
Secretary to the Council	Mr Ian Darker	= ð ð ~ì•íóíó ò-ò6322
Principal	Professor Stuart Reid	= ð ð ~ì•6960 (Principal's Office)
Chairman of Audit Committee	M• u v W CE ,]	W B } v • CE š } CE Ç } • = } A •
Chairman of Council	CE } v •• z } μ v P } (K	š] ^ ^ } v CE š CE Ç š } } μ v] o ~ •
Director of Human Resources	Mrs Cindy Pike	= ð ð ~ì•í 6378 ò ò
Academic Registrar	Ms Emma Burchfield	= ð ð ~ì•íóíó ò ò ñ ñ ñ ñ