



## Whistleblowing

### The Policy

1 Solent University is committed to social justice and to conduct its affairs in ways that are consistent with standards expected in public life. The University is also committed to the principles of academic freedom enshrined in legislation and the University's Articles of Government.

2 Whistleblowing encourages and enables employees to raise serious concerns they may have within the University rather than overlooking a problem or 'blowing the whistle' outside.

### Aim of the Policy

To encourage employees to feel confident in raising concerns and to question and act upon serious concerns about practice that are in the public interest.

To provide avenues for employees to raise concerns in confidence and receive feedback on any action taken.

To ensure that employees receive a response to their concerns and they are aware of how to pursue them if they are not satisfied with the University's response.

To reassure employees that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure which is in the public interest.

To raise any genuine concern they have which may be one or more of the following -

1. a criminal offence has been committed, is being committed or is likely to be committed
  2. a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
  3. a miscarriage of justice has occurred, is occurring or is likely to occur
  4. the health and safety of any individual has been, is being or is likely to be endangered
  5. the environment has been, is being or is likely to be damaged
  6. information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed
- 3 Concerns raised by an eligible person will be appropriately investigated as a basis for any relevant corrective action. The Pro Vice- Chancellor Students and Governance will be made aware of any incidents reported who will notify the Vice-Chancellor.
- 4 People eligible to raise concerns under this policy include every person employed by the University, except Governors. Eligibility also applies to a person undertaking work for the University through an employment agency, or through a third party contract, or on a self-employed basis.

This policy does not apply to Governors (including those Governors who are also employees of the University). Any Governor with a concern should first raise the matter with the Chair of the Board of Governors or the Clerk to the Board of Governors



An eligible person who raises a concern in bad faith (for instance, raising a concern which the person would be able to know was not substantially correct, or raising a concern for personal gain or as part of furthering a personal dispute) will be subject to referral to the University's disciplinary procedure.

### **The Policy in practice**

- 5 The eligible person should register their concern in writing with a member of the University's senior management team. In most cases this will be with the relevant Director, or member of the Vice-Chancellor's Group. The written notification should make it clear that the concern is being raised as part of the Whistleblowing Policy.

The senior manager receiving the written notification will make a record of its receipt.

- 6 The senior manager will arrange for appropriate enquiries to be made about the registered concern. The nature of the enquiries will be relevant to the type and scope of the registered concern, including appropriate regard for any confidentiality that needs to apply.

- 7 The senior manager will make appropriate arrangements to keep the person who registered the concern informed of progress. This will include appropriate information about the conclusion of enquiries and any associated actions.

- 8 The senior manager will prepare a written report detailing the nature of the whistleblowing complaint, the investigation carried out as a result, and any associated recommendations and findings to be shared with and reviewed by the Pro Vice-Chancellor Students and Governance. This report will detail the nature of the complaint, findings, any associated risks and details of the implementation action taken and planned as a result.

- 9 Subject to the relevant criteria being met, (as detailed in 2.1 to 2.6), any instances of whistleblowing should be in the first instance reported by the Pro Vice-Chancellor Students and Governance to the Chair of the Audit Committee within 5 working days of receipt by way of a special investigation which comprises of a written report which provides appropriate assurance and contains the following information:

This report will detail the following;

- Nature of the complaint
- Findings
- Any associated risks
- Details of the implementation action taken and planned as a result.
- Details of the people involved and the means of preventing further such instances
- Any action taken against the people involved.
- Any action needed to strengthen processes to mitigate such instances arising in future, with a follow-up report on whether or not the actions have been taken.

- 10 The written report will then be presented at the next meeting of the Audit Committee.

- 11 Notwithstanding the internal procedure, an eligible person may register their concern in accordance with the provisions of the Public Interest Disclosure Act 1998. This may be where the eligible person believes that it may be inappropriate to raise their concern within the University, or where they are not satisfied with the progress and action taken by the University. The Act provides protection for disclosures made in the categories set out in paragraph 2. An eligible person is not entitled to make a disclosure if in so doing they commit



a criminal offence.

- 12 Further advice is available as follows -  
Internally - from the People and Development, or in the case of Governors from the Clerk to the Board of Governors.  
Externally - from either the Office for Students [Home - Office for Students](#) or Protect: Speak up stop harm; <https://protect-advice.org.uk/> the leading authority on public interest whistleblowing.