

## WHISTLEBLOWING POLICY AND PROCEDURE

### The Policy

1. Southampton 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. The University's policy is to enable an eligible person acting in good faith to raise internally within the University any genuine concern they have about the organisation. The types of concern that may be raised through the whistleblowing policy may be one or more of the following:
  - a) a criminal offence has been committed, is being committed or is likely to be committed;
  - b) a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
  - c) a miscarriage of justice has occurred, is occurring or is likely to occur;
  - d) the health and safety of any individual has been, is being or is likely to be endangered;
  - e) the environment has been, is being or is likely to be damaged;
  - f) 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.
4. An eligible person who in good faith raises a genuine concern under this policy will not be subject to any form of detriment or disadvantage as a result of having raised their concern.
5. People eligible to raise concerns under this policy include every person employed by the University. 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 Chairman of the Board of Governors or the Clerk to the Board of Governors.

6. 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**

7. 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 Dean, Director, Head of Service, 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.

8. 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.
9. 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. The senior manager will also prepare an appropriate written report to the Audit Committee.
10. 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.
11. Further advice is available as follows:

Internally - from the Human Resource Service, or in the case of Governors from the Clerk to the Board of Governors.

Externally - from either the Higher Education Funding Council for England website ([www.hefce.ac.uk](http://www.hefce.ac.uk)) or [Public Concern at Work](#), the leading authority on public interest whistleblowing.