

## WHISTLEBLOWING POLICY AND PROCEDURE

### Introduction

1. The Whistleblowing Policy and Procedure establishes a clear and transparent process for reporting serious concerns that are in the public interest. By providing this mechanism, the University empowers individuals to raise concerns about potential risks, wrongdoing, or malpractice that might otherwise remain unaddressed. Anyone who makes a disclosure under this policy and procedure will be supported and protected from retaliation.

### Scope

2. This policy and procedure apply to all employees, students, volunteers, contractors, subcontractors, suppliers, visitors, and others working with or on behalf of Richmond American University London.
3. For individuals employed under specific contractual arrangements with third-party service providers, the applicable whistleblowing policy of their direct employer may apply. In the absence of such a policy, this University policy will govern.

### Definitions and Context

4. Whistleblowing refers to raising a concern or making a disclosure in the public interest—meaning a report of serious wrongdoing that extends beyond a personal grievance and may affect others or the broader University community. Concerns may be raised by employees, students, contractors, visitors, or others covered by this policy.
5. Anonymous disclosures may be considered under this policy; this may limit the University's ability to conduct a full investigation or provide feedback to the individual raising the concern. Individuals wishing to report anonymously are encouraged to include as much detail as possible.
6. Where appropriate, third-party platforms or intermediaries (such as external advice services) may be used to facilitate anonymous reporting.
7. Concerns that relate solely to personal matters, such as individual employment disputes or interpersonal conflicts, should be addressed through other established procedures (e.g., the Grievance Procedure or Student Complaints Procedure).
8. While workplace concerns are often raised initially with a line manager or supervisor, the University recognises that the seriousness or sensitivity of certain issues may make it necessary to report them directly through this formal whistleblowing process.

## Policy Statement

9. In line with the Nolan Principles of Public Life, this policy covers concerns that are in the public interest—meaning serious wrongdoing that has an impact beyond the individual making the disclosure. Concerns may include, but are not limited to:
  - a. A criminal offence being committed, or likely to be committed
  - b. A failure to comply with a legal obligation
  - c. A miscarriage of justice
  - d. Risk to the health or safety of an individual
  - e. Damage or likely damage to the environment
  - f. Academic malpractice
  - g. Improper conduct or unethical behaviour
  - h. Financial malpractice, impropriety, or fraud
  - i. Deliberate concealment or tampering with evidence of any of the above
10. The policy meets the legal protections provided under the Employment Rights Act 1996 and extends beyond its statutory requirements in two important ways: first, by broadening the types of concerns eligible for protection; and second, by making these protections available not only to employees, but also to students, volunteers, and other members of the University community.
11. Individuals who raise concerns under this policy will be treated fairly and their disclosures taken seriously. They will be protected from any adverse treatment or retaliation as a result of raising a concern in good faith; any act of victimisation will be treated as a disciplinary matter.
12. This policy is intended to support individuals who have reason to believe serious wrongdoing or malpractice has occurred, provided they follow the process outlined here. It is not intended as a mechanism to challenge University decisions unless they involve malpractice, nor may it be used to revisit personal matters already addressed under other procedures such as grievance, disciplinary, capability, or student conduct processes. Disclosures that do not relate to matters of public interest are not protected under this policy and may not be investigated under its provisions.

## Procedures for Making a Disclosure

### 13. Informal Process

- 13.1 Normally, concerns about workplace issues should be raised with the individual's line manager or Head of Department. For students, concerns should normally be raised through the Student Complaints Procedure.
- 13.2 However, where the seriousness or sensitivity of the issue makes this impractical—particularly if the concern involves the manager or another

senior individual—concerns should be raised directly under this policy through the formal whistleblowing process.

#### **14. Formal Process**

- 14.1 Concerns should be raised initially with a member of University Board or the Head of HR) who will serve as designated officer. If the concern involves a member of University Board, the disclosure should instead be submitted to the President. If the concern involves the President, the disclosure should be directed to the Chair of the Board of Trustees.
- 14.2 Disclosures should be made in writing and should clearly indicate that the concern is being raised under the Whistleblowing Policy and Procedure. The disclosure should provide sufficient detail about the nature of the concern, explain why the individual believes malpractice or serious wrongdoing has occurred, and set out why the disclosure is being made in the public interest. Supporting background information and any relevant evidence should be included where possible.
- 14.3 Upon receiving a disclosure, the designated officer will acknowledge receipt in writing within 10 working days. The designated officer will determine next steps, which may involve consulting with the Human Resources Department or another senior independent member of staff, depending on the nature of the concern. Possible next steps may include:
  - 14.3.1. Initiating an investigation under the University's investigation procedures
  - 14.3.2. Commissioning an ad hoc investigation appropriate to the circumstances
  - 14.3.3. Referring the matter to external authorities, such as the police
  - 14.3.4. Deciding that no further action is necessary if the concern is found to lack sufficient merit.
- 14.4 If an investigation is undertaken, the findings will be reported to the designated officer, who will determine whether further action is warranted. This may include initiating proceedings under the University's Disciplinary Procedure.
- 14.5 The individual raising the concern will be provided with feedback on the outcome within three months of the acknowledgment of their disclosure. While the University will strive to keep the individual informed, confidentiality requirements may limit the information that can be shared, particularly regarding matters involving other individuals.
- 14.6 There is no formal right of appeal under this procedure. This reflects the need to preserve confidentiality, particularly where disclosures involve sensitive or legally protected information. However, if a whistleblower believes the

procedure was not followed correctly, they may raise this concern with the President (or the Board of Trustees, if the case involves the President).

- 14.7 A central record of whistleblowing disclosures will be maintained by Human Resources. This record will include the date of the disclosure, the general nature of the concern, the department or area involved, the individual responsible for investigating or reviewing the matter, and the outcome. To protect confidentiality, the name of the individual making the disclosure will not be recorded in the central log. These records will support monitoring of the policy's effectiveness and provide oversight of the number, type, and areas of disclosures. Any detailed investigation notes will be retained confidentially by the investigator.
15. The University recognises that raising concerns—especially those involving serious wrongdoing—can be distressing. Individuals making disclosures under this policy may access confidential support through the Health Assured Employee Assistance Programme (EAP), which offers 24/7 counselling, legal advice, and emotional wellbeing resources. This service is available free of charge to staff and students and can be reached at 0800 028 0199. In addition, individuals may wish to consult Protect (<https://protect-advice.org.uk/>), an independent UK charity offering legal advice and support to whistleblowers.

## Related Policies

16. This policy should be read alongside the following University policies and procedures (available on the University [website](#) and [intranet](#)):
- 16.1 Complaints Policy
  - 16.2 Student Code of Conduct
  - 16.3 Academic Appeals Policy
  - 16.4 Academic Misconduct Policy
  - 16.5 Dignity at Work and Study Policy
  - 16.6 Grievance Procedure
  - 16.7 Conflict of Interest Policy and Procedure

## VERSION MANAGEMENT

<b>Responsible Department: President's Office</b>			
<b>Approving Body: University Board (on recommendation of Operations Committee)</b>			
<b>Version no.</b>	<b>Key Changes</b>	<b>Date of Approval</b>	<b>Date of Effect</b>
1.0	Initial Version	24 July 2025	September 2025
		<b>Restricted Access?</b> <i>Tick as appropriate:</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	