

WHISTLEBLOWING POLICY AND PROCEDURE

Introduction

1. The Whistleblowing Policy and Procedure establishes a clear process for reporting serious concerns that are in the public interest. It enables individuals to raise concerns about potential wrongdoing, malpractice, or serious risk that might otherwise remain unaddressed. Anyone who makes a disclosure under this policy 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 contractual arrangements with third-party service providers, the whistleblowing policy of their direct employer may apply in the first instance. However, concerns relating to serious wrongdoing, malpractice, or risk involving the University, its community, or activities may also be raised under this policy.

Definitions and Context

4. Whistleblowing refers to raising a concern or making a disclosure in the public interest about serious wrongdoing, malpractice, or risk. This means a concern that extends beyond a purely personal grievance and may affect others, the University, or the wider public. Concerns may be raised by employees, students, contractors, visitors, or others covered by this policy.
5. Anonymous disclosures may be considered under this policy. However, anonymity may limit the University's ability to investigate fully, seek clarification, or provide feedback. Individuals reporting anonymously are encouraged to provide as much detail and supporting information as possible.
6. Individuals may seek independent advice before making a disclosure, including from Protect, the UK whistleblowing charity, or another appropriate adviser.
7. Concerns that relate solely to personal matters, such as individual employment disputes or interpersonal conflicts, should normally be addressed through other established procedures, such as the Grievance Procedure or Student Complaints Procedure. Where a concern includes both a personal matter and a wider public-interest issue, the University may determine the most appropriate procedure to use.

8. While concerns may often be raised initially with a line manager, supervisor, or relevant University contact, the University recognises that the seriousness or sensitivity of certain issues may make it necessary to report them directly through the 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:
 - 9.1 A criminal offence being committed, or likely to be committed
 - 9.2 A failure to comply with a legal obligation
 - 9.3 A miscarriage of justice
 - 9.4 Risk to the health or safety of an individual
 - 9.5 Damage or likely damage to the environment
 - 9.6 Sexual misconduct, harassment, abuse, or discriminatory behaviour
 - 9.7 Academic malpractice
 - 9.8 Improper conduct, abuse of authority, or unethical behaviour
 - 9.9 Financial malpractice, impropriety, or fraud
 - 9.10 Actions or inaction which may restrict freedom of speech and expression and academic freedom more broadly
 - 9.11 Serious misconduct by third parties working with, for, or on behalf of the University
 - 9.12 Deliberate concealment, destruction, or tampering with evidence relating to any of the above.
10. This policy reflects the 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 retaliation or other detrimental treatment as a result of raising a concern under this policy. Any act of victimisation, retaliation, or the deliberate making of knowingly false or malicious allegations may 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. It is not intended to challenge University decisions unless they involve malpractice, nor to revisit matters already addressed under other procedures such as grievance, disciplinary, capability, or student conduct processes. Concerns that do not involve matters of public interest may not be considered under this policy. Where a concern includes both a personal matter and a wider public-interest issue, the University may determine the most appropriate procedure to apply.

Procedures for Making a Disclosure

13. Informal Process

- 13.1 Normally, concerns should first be raised with an appropriate manager, supervisor, Head of Department, or relevant University contact. Students may also raise concerns through the Student Complaints Procedure where appropriate.
- 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 the Head of HR or a member of University Board, who will act as the designated officer for the purposes of this procedure. 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 and why the individual believes serious wrongdoing or malpractice may have occurred. Supporting information and any relevant evidence should be included where possible. Individuals are not required to prove wrongdoing but should have a reasonable belief that the concern is raised in the public interest.
- 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, Information Commissioner's Office, or other relevant regulators
 - 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 normally 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 Individuals may make protected disclosures to appropriate external prescribed bodies in accordance with applicable law.
- 14.7 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, where the disclosure concerns the President, with the Board of Trustees.
- 14.8 A central record of whistleblowing disclosures will be maintained by the President's Office. 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](#), 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
- 16.8 Freedom of Speech Guidance and Code of Practice

VERSION MANAGEMENT

Responsible Department: President's Office			
Approving Body: University Board (on recommendation of Operations Committee)			
Version no.	Key Changes	Date of Approval	Date of Effect
1.0	Initial Version	24 July 2025	September 2025
2.0	Updates to improve clarity and align policy with current whistleblowing guidance, including reporting routes, protections against retaliation, examples of covered concerns, and transfer of central record oversight to President's Office. Explicit reference to freedom of speech included.	2 June 2026	September 2026
		Restricted Access? <i>Tick as appropriate:</i> Yes ☐ No ☒	