

# Student Guidance on the University's Whistleblowing ('Speak Up') Procedure

<b>Approved by:</b> Audit Committee	<b>Effective date:</b> May 2026	<b>Next review:</b> October 2028
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## Student Guidance on the University's Whistleblowing ('Speak Up') Procedure

Canterbury Christ Church University ('the University', 'we', or 'us') is committed to acting with honesty and integrity within a culture of openness and accountability to prevent and deal with illegal or unethical conduct as efficiently as possible.

The University encourages students to report wrongdoing or danger at the University to us as soon as possible after they become aware of it or suspect it.

This Guidance explains how students and apprentices studying at Canterbury Christ Church University, including those studying at partner institutions for a University award, can raise concerns about suspected wrongdoing or danger relating to the University or to matters within the University's academic, contractual, oversight, regulatory, or other responsibilities.

In operating this Guidance, the University seeks to promote psychological safety by creating an environment in which students feel able to raise genuine concerns without fear of unfair treatment, judgment, or avoidable negative consequences.

We want this Guidance to encourage you to report wrongdoing or danger at the University to us as soon as possible after you become aware of it or suspect it, which involves

- a criminal offence, for example, fraud or bribery
- a risk to a person's health or safety
- the risk or actual damage to the environment
- a miscarriage of justice
- a failure to comply with a legal obligation, for example, in relation to [student consumer protection](#) (for example, concerns about whether students are receiving accurate information about their course, teaching, assessment, services, or important changes affecting their studies), equality, safeguarding, or health and safety duties
- sexual harassment, where the concern is raised in the public interest, for example, because it suggests systemic failings, concealment, repeated misconduct, institutional inaction, or wider risks affecting others
- the covering up of wrongdoing

We will seek to protect you if you make a disclosure in the public interest about wrongdoing/malpractice.

When we talk about a concern being in the public interest, we mean that it affects more than just one individual and raises an issue that could have wider consequences for others or for the University.



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The issue need not affect the general public or attract media attention to be in the public interest. Concerns affecting a group of students, a course, a department, or a particular setting within the University can still be in the public interest.

There are separate arrangements that apply regarding the Christ Church Students' Union. We explain what to do if you wish to report or speak up about wrongdoing at the Students' Union.

If you are an employee (for instance, through Unitemps), a volunteer (even if you are unpaid), an intern, an apprentice or on work experience at the University and a student, you may use the Staff Whistleblowing Policy as an alternative: [Staff Whistleblowing Policy](#).

This Guidance is available to students on placements and apprenticeships in relation to concerns that relate to the University's role, responsibilities, services, teaching, assessment, administration, management, or other matters within the University's remit.

Concerns that relate solely to an apprentice's employment, employer, workplace arrangements, or the host organisation for a placement will normally fall outside the scope of this Guidance and should usually be raised under that organisation's own whistleblowing, speak-up, complaints, or employment procedures.

### Who needs to know about the Guidance?

- Students and Apprentices
- Student-facing members of staff

### Purpose of the Guidance

This Guidance explains how you can report your concerns about wrongdoing or danger, knowing that you can do so without fear of victimisation, harassment, or its detrimental effect on your studies, even if your concerns are mistaken.

### Contacts

The University Solicitor:

- advises on any uncertainties of the scope of this Guidance
- receives and acts upon any reports made under this Guidance

We encourage you to inform the University Solicitor as soon as possible after you notice or suspect wrongdoing or danger at the University of the kind described above. Importantly, we want to reassure you that we will take any concerns you report to us seriously.

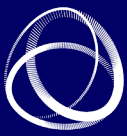
The University Solicitor can be contacted by emailing: [gls.compliance@canterbury.ac.uk](mailto:gls.compliance@canterbury.ac.uk)



# Student Guidance on the University’s Whistleblowing (‘Speak Up’) Procedure

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# Student Guidance on the University's Whistleblowing ('Speak Up') Procedure

## 1. Raising a concern if you suspect wrongdoing or danger at the University

### *Our Commitment*

- 1.1. Canterbury Christ Church University ('the University', 'we', or 'us') is committed to acting with honesty and integrity within a culture of openness and accountability to prevent and deal with illegal or unethical conduct as efficiently as possible. The University encourages students to report wrongdoing or danger at the University to us as soon as possible after they become aware of it or suspect it.

### *Apprenticeships and Students on Placements*

- 1.2 This Guidance may apply where the concern relates to the University's oversight responsibilities, including academic supervision, placement approval, safeguarding response, teaching, assessment, administration, management, or any issue materially affecting the student's University course.
- 1.3 Concerns that relate solely to the apprentice's employment, employer, or workplace employment and students on placements, arrangements will normally fall outside the scope of this Guidance. They should usually be raised under the employer's own whistleblowing or employment procedures.
- 1.4 Where a concern involves both the employer's setting and your course, or the University's responsibilities, the University will consider the matter on a case-by-case basis and may liaise with the apprentice or student to determine the most appropriate course of action.

### *Students at Partner Institutions*

- 1.5 This Guidance applies to concerns relating to provision delivered through a partner institution that involve the University's contractual, academic quality, assessment, student protection, oversight, regulatory, or other responsibilities, including failures at the interface between the University and the partner institution.
- 1.6 It may include, for example, concerns about fraud, bribery, corruption, facilitation of academic misconduct, failures in assessment or student protection, or conduct by partner staff that may affect the University's legal or regulatory responsibilities.
- 1.7 Concerns relating solely to a partner institution's own internal operations, and not to matters within the University's responsibilities, will normally be raised under that partner institution's own whistleblowing, complaints, or related procedures. Where it is unclear which route applies, the University will adopt a 'no wrong door' approach and help ensure the concern is considered appropriately.
- 1.8 The University may provide supplementary Guidance explaining how whistleblowing concerns connected with partner institutions should be raised and how they will be considered.

### *What is Whistleblowing?*

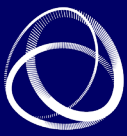


## Student Guidance on the University's Whistleblowing ('Speak Up') Procedure

- 1.9 Whistleblowing means the reporting or exposing of wrongdoing or danger. We sometimes use the term 'speaking up' because it's easier to understand.
- 1.10 We want this Guidance to encourage you to report wrongdoing or danger at the University to us as soon as possible after you become aware of it or suspect it.
- 1.11 We encourage you to report suspected wrongdoing or danger to us if you believe any of the following has happened or is likely to happen within the University or in connection with matters for which the University is responsible.
- a criminal offence, for instance, bribery or fraud;
  - a failure to comply with a legal obligation, for example, in relation to [student consumer protection](#) (for example, concerns about whether students are receiving accurate information about their course, teaching, assessment, services, or important changes affecting their studies), equality, safeguarding, or health and safety duties;
  - a miscarriage of justice;
  - a danger to the health and safety of an individual;
  - a damage to the environment;
  - sexual harassment, which is unwanted conduct of a sexual nature by other people, where the concern is raised in the public interest, for example, because it suggests systemic failings, concealment, repeated misconduct, institutional inaction, or wider risks affecting others; and
  - the deliberate concealment of these matters.

### *What does "public interest" mean?*

- 1.12 The wrongdoing disclosed must be in the public interest. It means it must affect others, even if it also affects you. If it only affects you personally, we have other procedures you can use. If you have a personal complaint or grievance (for example, about bullying, harassment, or discrimination against you as a person), you can use the [Student Complaints Procedure](#).
- 1.13 When we talk about a concern being in the **public interest**, we mean that it affects more than just one individual and raises an issue that could have wider consequences for others or for the University.
- 1.14 The issue need not affect the general public or attract media attention to be in the public interest. Concerns affecting a group of students, a course, a department, or a particular setting within the University can still be in the public interest.



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- 1.15 Whistleblowing under this Guidance means raising a concern, in the public interest, about suspected wrongdoing, risk, malpractice, misconduct, concealment, or failure by the University or those acting on its behalf.
- 1.16 A concern may begin with an issue affecting one student but still amount to whistleblowing where it reasonably appears to reveal wider detriment, systemic failings, or risks affecting others.

### *What whistleblowing is not*

- 1.17 This Guidance is not intended to respond to or provide a solution to personal concerns or problems. Where a concern is primarily about an individual complaint, a dispute, or the conduct of a particular student or staff member affecting the reporting student personally, the University may redirect the matter to another appropriate procedure.

### *No wrong door*

- 1.18 The University recognises that it may not always be clear which procedure or reporting route is most appropriate. If a concern is raised under the wrong procedure or with the incorrect individual, the University will ensure it is redirected appropriately and that the individual raising the concern is not disadvantaged. Students are encouraged to raise concerns even where they are unsure of the correct procedure.
- 1.19 Examples of matters that will usually fall outside this Guidance include:
- a personal complaint by a student about how they have been treated by a member of staff, which will usually be under the student complaints procedure;
  - a concern about the behaviour of another student towards the reporting student, which will usually be under the student conduct procedure; and
  - a request for a personal academic or service remedy.
- 1.20 Concerns relating to sexual harassment or sexual misconduct may fall within this Guidance when raised in the public interest, for example, where they concern suspected systemic failings, concealment, repeated misconduct, institutional inaction, or risks affecting others.
- 1.21 An individual allegation of sexual harassment or sexual misconduct seeking a personal remedy will normally be addressed under the relevant complaints, conduct, or other applicable procedure.
- 1.22 However, where a concern also indicates wider institutional wrongdoing or a matter affecting others and raised in the public interest, the University may consider whether whistleblowing elements are also engaged.



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- 1.23 Where this happens, the timescales for the receiving procedure will begin only when the matter is formally accepted under that procedure, not from the date it was first raised under this Guidance.
- 1.24 Where a concern raised under this Guidance appears better suited to another procedure, the University will normally discuss this with you and, where appropriate, seek your consent before transferring relevant information. You may be asked to provide further information required for the receiving procedure.

### *Protection from Detriment when Raising a Concern in Good Faith*

- 1.25 The University is committed to ensuring that students who raise concerns in good faith are protected from detriment and treated fairly.
- 1.26 Raising a concern in good faith means being honest and sincere about something you genuinely believe may be wrong, even if it later turns out you were mistaken.
- 1.2. Detriment means being treated unfairly because you spoke up, for example, through unfair marking, exclusion from opportunities, hostile behaviour, or loss of support.
  - 1.3. Detriment can be intentional or unintentional, and both matter. It can happen during or after a concern is raised. It does not have to be a single serious act; a pattern of small actions can still amount to detriment. You should experience none of these outcomes because you raised a concern honestly and in good faith.
- 1.27 If you believe you are being treated unfairly because you spoke up, tell the person or team handling your concern or discuss the issue with the Students' Union as soon as possible. You can get in touch with the Students' Union by emailing [advice@ccsu.co.uk](mailto:advice@ccsu.co.uk).

### *Relationship with free-speech duties*

- 1.28 Nothing in this Guidance restricts the lawful exercise of academic freedom or freedom of speech. This Guidance should be read alongside the University's Code of Practice on Free Speech ('the Code'), which outlines how the University meets its legal obligations under the Higher Education (Freedom of Speech) Act 2023.
- 1.29 In cases of uncertainty, the University's approach to freedom of speech and academic freedom, as outlined in the Code, takes precedence.

## 2. How to report a concern

- 2.1 You do not need to have all of this information before raising a concern. Include as much as you reasonably can. Here is a list of things to think about, but it is here to help you make a report. It is not required that you use it to report a concern, but it will help the University investigate it. You can, if you wish, make use of our online form.

### *1. What happened (or what you are worried might happen)*



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- A clear description of the concern or wrongdoing
- What you saw, heard, or became aware of
- Whether the issue is ongoing, has already happened, or is likely to happen

### 2. *When and where*

- Dates and times (or approximate timeframes)
- Locations (for example, a particular building, School, department, placement, or online setting)

### 3. *Who is involved*

- Names and/or roles of individuals involved (if known)
- Whether the concern involves staff, students, contractors, or others

### 4. *How you became aware of the issue*

- Whether you witnessed it directly
- Whether it was reported to you by someone else
- Whether you have documents, messages, or other information

### 5. *Why it is that you are concerned*

- The harm, risk, or wrongdoing that you believe may be involved
- Whether others may be affected (students, staff, the University, or the public)
- Why it is you believe the issue may be in the public interest

### 6. *Evidence (if available)*

- Documents, emails, messages, screenshots, or records
- Where relevant information might be located if you do not have the evidence

**You are not required to gather evidence yourself or to put yourself at risk.**

### 7. *What steps you have already taken (if any)*

- Whether you have raised the concern before
- Who you raised it with and when
- What response, if any, you received

### 8. *Your preferred contact details – Unless you wish to report anonymously*

- Your name and contact information (if you are willing to provide them)
- Whether you would like your identity to be kept confidential
- Whether you are raising the concern anonymously



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- Anonymous disclosures are accepted, but providing contact details may help the University investigate and keep you informed.

### 9. Any immediate risks

- Whether there is an urgent risk to health, safety, or wellbeing
- Whether safeguarding or emergency action may be needed

### What you do not need to do

- You do not need to prove wrongdoing
- You do not need legal knowledge
- You do not need to (and should not) investigate the matter yourself
- You do not need to be certain — a reasonable belief is enough as long as you act in the public interest

## 3. Submitting the Report

### Where to make a report

- 3.1 We ask that you report the suspected wrongdoing to the University Solicitor as soon as possible. You can do this by emailing [gls.compliance@canterbury.ac.uk](mailto:gls.compliance@canterbury.ac.uk).
- 3.2 If your concern relates to the University Solicitor, or you reasonably believe it would be inappropriate to report it to them, you should raise it with the Vice-Chancellor by emailing [vc@canterbury.ac.uk](mailto:vc@canterbury.ac.uk).

### Confidentiality

- 3.3 Importantly, we want to reassure you that if you report a concern to us, we will take you seriously and respect your confidentiality. We will take all reasonable steps to protect your identity should you report suspected wrongdoing or danger at the University.
- 3.4 The exceptions would be if
  - You waive confidentiality.
  - The person(s) dealing with your report of suspected wrongdoing consider that confidentiality is incompatible with fairness to any person under investigation.
  - There is an overriding reason for your identity not to be kept confidential (for example, if required to be disclosed by law).
  - There is a safeguarding issue that affects you or someone else.



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- 3.5 If your concern is redirected to another University procedure, confidentiality or anonymity may not be capable of being maintained to the same extent, and the University will explain this to you before any onward referral, wherever practicable.
- 3.6 If your identity is not to be kept confidential, we will tell you first and explore how to proceed.

### *Where you can get advice*

- 3.7 It may be difficult for you to tell us something has gone wrong or raise a concern. If you are a student and want independent, confidential advice, the Students' Union Advice Centre is independent of the University and can support you with raising a concern. You can contact the Advice Centre by emailing [advice@ccsu.co.uk](mailto:advice@ccsu.co.uk).
- 3.8 Seeking advice from the Students' Union Advice Centre does not prevent you from reporting directly to the University.

### *Where to get support*

- 3.9 If you feel your concerns are affecting your wellbeing, we encourage you to seek support, either through [Student Wellbeing Services](#) at the University or through external organisations.
- 3.10 You can also get further information from [Citizens' Advice](#) (telephone 0800 144 8848) or the whistleblowing charity [Protect](#) (telephone 0203 117 2520)

### *Raising a Concern Externally*

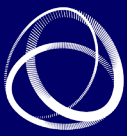
- 3.11 If you do not wish to raise your concern internally, or if you believe it has not been addressed appropriately, you may raise it externally with an appropriate regulator or prescribed body, such as [the Office for Students](#).

### *Anonymous concerns*

- 3.12 You may report suspected wrongdoing anonymously through any anonymous reporting route published by the University from time to time. Anonymous reports will be considered where sufficient information is provided to enable proportionate investigation.
- 3.13 Anonymous reports may be considered, but anonymity can limit what the University can investigate or act upon. If you do not provide contact details, the University cannot seek clarification, request further information, or provide feedback on the outcome.

## 4. What happens after making a report

- 4.1 Should you report wrongdoing or danger at the University to us, we will record it and deal with it quickly and efficiently. We may decide to appoint an investigator to look into your concerns. We may decide to engage an investigator outside the University and independent of it.



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- 4.2 On receipt of the concern, the University Solicitor will
- (a) Acknowledge receipt within five working days.
  - (b) Make an initial assessment within 20 working days to determine:
    - Whether the concern falls within the scope of this Guidance.
    - Whether it needs investigation under this Guidance or is referred to another procedure.
    - The level of investigation required and its scope.
  - (c) Tell you how we propose to deal with your report and, where appropriate, keep you informed of progress and the outcome. We will tell you the expected timescale.
- 4.3 The need for us to protect the confidentiality of all our students and staff may prevent us from disclosing certain information to you.
- 4.4 We may offer to hold a meeting with you, either in person or remotely, but you do not need to attend. If we meet with you, we will need to take notes to produce a written summary of the key points about the suspected wrongdoing or danger. If you report wrongdoing or danger at the University, you can ask someone to accompany you (for example, a fellow student, a representative from Christ Church Students' Union, or a staff member) to any meetings we invite you to and you decide to attend.
- 4.5 We may ask follow-up questions in writing, but you are not required to answer any of them.

### 5. Christ Church Students' Union

- 5.1 If you have a complaint about the Students' Union, please follow the [Students' Union Comments, Complaints and Feedback Policy and Procedure](#).
- 5.2 If you have any concerns about an elected officer of the Students' Union, follow the procedure in the [Students' Union Bye-Laws](#).
- 5.3 If, as an employee of the Students' Union, you have a complaint about another employee of the Students' Union, contact the [CEO or the Chair of the Board of Trustees of the Students' Union](#).

### Useful Contact Details and Links

The following contact details may assist you.

- University Solicitor: [gls.compliance@canterbury.ac.uk](mailto:gls.compliance@canterbury.ac.uk)
- Vice-Chancellor and Principal: [vc@canterbury.ac.uk](mailto:vc@canterbury.ac.uk)



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- Chair of the Governing Body: via [gls.compliance@canterbury.ac.uk](mailto:gls.compliance@canterbury.ac.uk)
- Chair of the Audit Committee: via [gls.compliance@canterbury.ac.uk](mailto:gls.compliance@canterbury.ac.uk)
- Students' Union Advice Centre: [advice@ccsu.co.uk](mailto:advice@ccsu.co.uk) or call 01227 924924
- CEO at Christ Church Students' Union: [CEO@ccsu.co.uk](mailto:CEO@ccsu.co.uk)



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Document information	Description of document information
<b>Document title</b>	Student Guidance on the University’s Whistleblowing (‘Speak Up’) Procedure
<b>Department owner</b>	Governance and Legal Services
<b>Document category</b>	<b>Financial</b> - Documents relating to accounting, budgeting, procurement, travel and other financial functions <b>Governance</b> - Documents relating to the governance of the University <b>Students</b> - documents directly affecting student life at the University
<b>Document owner</b>	University Solicitor
<b>Document manager</b>	University Solicitor
<b>Related University policies</b>	<a href="#">Fraud, Bribery and Corporate Corruption Policy</a> <a href="#">Staff Whistleblowing Policy</a>
<b>Related University procedures</b>	<a href="#">Student Complaints Procedure - Canterbury Christ Church University</a>
<b>Approved by</b>	Audit Committee
<b>Date approved</b>	May 2026
<b>Date of commencement</b>	May 2026
<b>Review date</b>	October 2028
<b>Version</b>	Version 4
<b>History of revisions of the document</b>	Version 1, approved by Audit Committee 13 May 2020 Version 2, approved by Audit Committee 21 February 2022 Version 3, approved by Audit Committee 3 April 2024 Version 4, approved by Audit Committee May 2026
<b>Web address</b>	<a href="#">Whistleblowing Student Guidance</a>