



WHISTLEBLOWING POLICY

Review Date: May 2021

Revision No: 1

Approved By: Audit Committee

Approval Date: 13 May 2020

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REVIEW

The Whistleblowing Policy shall be reviewed by the Audit Committee from a legal and operational perspective at least once a year.

The next scheduled review is May 2021.

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1. WHO IS THIS POLICY FOR AND WHAT DOES IT COVER?

- 1.1 Canterbury Christ Church University ('the University', 'we', or 'us'), is committed to acting honestly and with integrity, within a culture of openness and accountability to prevent and deal with illegal or unethical conduct as efficiently as possible.
- 1.2 This Whistleblowing Policy ('the Policy') applies to all our employees, officers, consultants, contractors, casual and agency workers ('you').
- 1.3 We have written and implemented this policy following consultation with the Joint Negotiation and Consultation Committee. This policy does not form part of any employee's contract of employment and it may be amended at any time.
- 1.4 'Whistleblowing' means reporting or exposing a wrongdoing or danger. We want this policy 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.
- 1.5 You are encouraged to report wrongdoing or danger at work to us under this policy if you believe the following things have happened or are likely to happen:
 - (a) criminal activity;
 - (b) failure to comply with legal requirements;
 - (c) miscarriages of justice;
 - (d) danger to the health and safety of an individual;
 - (e) damage to the environment; and
 - (f) the deliberate concealment of any of these matters.

It may be that you have a concern about a wrongdoing or danger at work as a result of someone breaching the University's policies and procedures, including *The Staff Code*. The wrongdoing or danger may involve potential damage to the University's reputation or financial wellbeing.

- 1.6 Importantly, we want to reassure you that if you report a concern to us you will be taken seriously and your confidentiality will be respected.
- 1.7 If you are uncertain about whether something is within the scope of this policy, you can ask the University Solicitor for advice.
- 1.8 The policy sets out how to report your concerns about wrongdoing in the knowledge that you can do so without fear of reprisals, even if your concerns turn out to be mistaken. You should normally be able to inform your head of department or staff representative of your concern. Alternatively, you can let someone else know, as set out in section 2. The policy also sets out what will happen after you have reported.
- 1.9 We recognise that it may be difficult for you to let us know that something has gone wrong or raise a concern under this policy. It can result in stress and anxiety. You can find the details of an independent confidential counselling helpline at paragraph 5.

2. HOW TO RAISE YOUR CONCERNS IF YOU SUSPECT A WRONGDOING OR DANGER AT WORK

- 2.1 If you have a complaint about your own personal circumstances, such as the way you have been treated, you should use the Grievance Procedure <https://cccu.canterbury.ac.uk/hr-and-od/policies-and-procedures/grievance.aspx>.
- 2.2 If you believe that a financial or other advantage has been offered or accepted by someone in connection with the University's business which is contrary to the Bribery Act 2010, you should follow the procedure set out in the University's Anti-Bribery Policy <https://www.canterbury.ac.uk/university-solicitors-office/policies-and-procedures/anti-bribery-and-fraud.aspx>.
- 2.3 If you believe that financial wrongdoing has taken place, you should report this to your head of department. If this is not appropriate, for example, because your concerns relate to the head of your department, you should report your concerns to the Director of Finance. The Director of Finance may then ask the University's independent Internal Auditor to investigate and will always make a report to the Vice-Chancellor. If the wrongdoing relates to the conduct of the Director of Finance, you should follow the steps in paragraph 2.4.
- 2.4 If you believe that wrongdoing has taken place by the Director of Finance, or your concern is not about a financial matter (for example, if you believe that there is a danger to the health and safety of an individual or if it about the conduct of senior staff or a member of the Governing Body, or the conduct or collective decision making of one of our boards or committees), you should report your concern to the Vice-Chancellor, the Clerk to the Governing Body or the Chair of the Governing Body, as you consider appropriate in the circumstances. If, for any reason, you consider none of these individuals is appropriate, you should report the concern to the Chair of the Audit Committee. Contact details for each of these office holders of the University can be found at paragraph 5.
- 2.5 If for any reason you feel unable to report your concern in the way we have described in the above paragraphs, you may choose to raise it with a colleague instead or with your Trades Union representative. You also have the option to discuss your concern with Protect, which are an independent whistleblowing charity. You can find Protect's contact details at paragraph 5. Alternatively, you could seek independent legal advice by contacting a solicitor or raise your concern with a prescribed person or body from the list published by the Government to assist people with concerns about wrongdoing or danger at work. You can find the list by following this link: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>
- 2.6 You may inform us (or a prescribed person or body) anonymously, but we or the prescribed person may not be able to take things further if not all the required information has been provided.

3. WHAT HAPPENS NEXT

- 3.1 Please be reassured that if you decide to report suspected wrongdoing in accordance with this policy, we will ensure that, whenever possible, your identity will be kept

confidential. It is very important for us to do this to protect you from victimisation or reprisals.

- 3.2 We will take all reasonable steps to deal with your report of wrongdoing as quickly and efficiently as possible.
- 3.3 If you have reported a concern of wrongdoing or danger to us, the person to whom you have made the report will make a record of it and refer it to either the Vice-Chancellor, the Chair of the Governing Body or Chair of the Audit Committee as appropriate in the circumstances.
- 3.4 We will arrange a meeting with you at which we will need to take notes so we can produce a written summary of the key points about the wrongdoing or danger. We will aim to provide you with an indication as to how we propose to deal with your report. We will then make an initial assessment to determine the scope of any investigation or internal enquiry. We will notify you of the outcome of the initial assessment. We may need to ask you to attend further meetings to provide additional information.
- 3.5 An investigator may be appointed by the Vice-Chancellor (or by the Chair of the Governing Body, or Chair of the Audit Committee, as the case may be). The investigator may be the person to whom the concern has been raised or, where appropriate, by another person nominated by the Vice-Chancellor (or by the Chair of the Governing Body, or Chair of the Audit Committee as the case may be). We may decide that an investigation of the wrongdoing should take place under the University's Disciplinary Procedure <https://cccu.canterbury.ac.uk/hr-and-od/policies-and-procedures/discipline.aspx>.
- 3.6 We will ensure that any investigation is not carried out by the person who may ultimately have to reach a decision on the matter. An individual who is the subject of your report of suspected wrongdoing will normally be given a full opportunity to explain their response.
- 3.7 We will aim to keep you regularly informed of the progress and outcome of any investigation, but the need for confidentiality may prevent us from disclosing information about the matter or any disciplinary action taken as a result.
- 3.8 The investigation itself will be conducted on a confidential basis. You will be requested to keep appropriate confidentiality.
- 3.9 The findings of any investigation under this policy will be reported to the Audit Committee by the Vice-Chancellor.

4. MORE ABOUT THE SAFEGUARDS IN PLACE TO PROTECT YOU

- 4.1 You are entitled to be accompanied by a work colleague or Trades Union representative at any meetings that take place under this policy.
- 4.2 Your report of wrongdoing will be kept confidential until an investigation is launched. After the investigation is launched, your identity will also be kept

confidential, if requested by you, unless this is incompatible with fairness, or if there is an overriding reason for disclosure (for example, if required by law). However, we may be unable to prevent your name being deduced by others, including those implicated in your report.

- 4.3 Except as mentioned in paragraph 4.2, if you have reported wrongdoing under this policy all reasonable steps will be taken to protect the confidentiality of your identity. We will inform you if your anonymity cannot be continued.
- 4.4 If, having reported suspected wrongdoing, you receive any reprisals, threats, other unfavourable treatment or experience any victimisation, we will take disciplinary action against those individuals. You should notify the person to whom your report of wrongdoing has been made, or to the investigator, if one has been appointed, of any such treatment as soon as possible. If you consider the matter has not been resolved, you should use the University's Grievance Procedure (using the link at paragraph 2.1).

5. USEFUL CONTACTS

Director of Finance <https://www.canterbury.ac.uk/about-us/structure-and-governance/senior-management-team/david-leah.aspx>

University Solicitor <https://www.canterbury.ac.uk/university-solicitors-office/contact-us.aspx>

Vice-Chancellor <https://www.canterbury.ac.uk/about-us/structure-and-governance/vice-chancellor-and-principal.aspx>

Chair of the Governing Body <https://www.canterbury.ac.uk/about-us/structure-and-governance/governing-body/governing-body.aspx>

Chair of the Audit Committee <https://www.canterbury.ac.uk/about-us/structure-and-governance/governing-body/governing-body.aspx>

CiC - independent and confidential counselling helpline: 0800 085 1376

Protect - independent whistleblowing charity offering a free confidential helpline for advice: 0203 117 2520 or see their website: www.pcaw.co.uk (<https://www.pcaw.org.uk/>).

List of Prescribed Persons or Bodies published by the Government <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>