



BRIGHTON
STUDENTS' UNION

Whistleblowing Policy

BYE LAW of

UNIVERSITY OF BRIGHTON
STUDENTS' UNION

Passed at Trustee Board 18th February 2022

1. Introduction

- 1.1. Brighton Students' Union (BSU) are committed to running its services and operations with the highest possible standards of honesty and integrity.
- 1.2. We acknowledge that all organisations face the risk of things going wrong sometimes, and actively encourage staff to raise any areas of concern with confidence.
- 1.3. We acknowledge that staff may be cautious about raising concerns due to potential feelings of disloyalty or concern about retribution for example. This policy aims to encourage all BSU staff to report suspected wrongdoing as soon as possible, to know how to do it, and reassurance that it will be taken seriously and without risk of reprisal.
- 1.4. This policy should not be used for complaints relating to an individual's own personal circumstances and interest, such as the way they have been treated at work. In those cases, the relevant alternative procedure should be used eg. Grievance Policy.

2. Definitions

- 2.1. "Whistleblowing" is the disclosure of information by an employee or worker which relates to someone in danger, fraud or other illegal or unethical conduct connected with the workplace. It could include:
 - 2.1.1. a criminal offence, for example fraud
 - 2.1.2. someone's health and safety is in danger
 - 2.1.3. risk or actual damage to the environment
 - 2.1.4. a miscarriage of justice
 - 2.1.5. the company is breaking the law
 - 2.1.6. you believe someone is covering up a wrongdoing
- 2.2. A "whistleblower" is a person who raises a genuine concern relating to any of the above.

3. Raising a Whistleblowing concern

- 3.1. Staff should initially raise concerns with their Line Manager. If the concern is regarding the Line Manager, or the matter is deemed particularly serious and/or sensitive, then it can be reported directly to the Whistleblowing Officer.
- 3.2. The initial report can be verbal or in writing, and should contain as much information as possible. It does not need to include evidence, but should clearly state the reasonable grounds for concern.
- 3.3. Anonymous reports will be accepted, but are likely to create significant limitations for any subsequent investigation. It also won't be possible to provide feedback.
- 3.4. Whilst initial internal reporting is encouraged to ensure swift and appropriate action is taken, a Whistleblower may choose to report their concerns directly to an external agency. The Government identify prescribed people and bodies: [Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

4. Process and Outcome

- 4.1. The Whistleblowing Officer will endeavour to acknowledge receipt of the report within 10 working days of receipt, and determine the most appropriate course of action. This will be one of the following:

Immediate Action Required

- 4.1.1. Refer the concern to the most appropriate agency prior to any internal investigation.

Referral to alternative procedure

- 4.1.2. If the concern does not relate to list of whistleblowing matters, refer the matter to a more

appropriate procedure.

Investigate

4.1.3. Carry out an impartial investigation to determine as much information as possible.

4.1.4. The Whistleblower will normally be asked to attend a meeting. They may be accompanied by a trade union representative or a colleague.

4.2. The Whistleblower will be kept informed on the progress of their concerns, timings and any actions taken as a result including instigation of any disciplinary proceedings, noting that confidentiality may prevent full details being provided.

5. Whistleblowing Officer

5.1. The Whistleblowing Officer is the BSU Chief Executive Officer.

5.2. If the concern is regarding the Whistleblowing Officer, it should be referred to the Director of Human Resources who will contact a member of the Trustee Board to instigate the procedure.

6. Complaint/Dissatisfaction

6.1. The Whistleblowing Officer's decision is final.

6.2. If the Whistleblower is not happy with how the concern has been handled, they can:

6.2.1. Raise the matter with the Independent Whistleblowing Charity Protect: 0203 117 2520
www.pcaw.co.uk

6.2.2. Raise it directly with the appropriate external agency eg. Social services, HSE

7. Vexacious Whistleblowers

7.1. Sometimes concerns raised will be shown not to be a concern, despite the Whistleblower having genuine intentions. However, if an allegation is knowingly made maliciously or for personal gain, disciplinary action may be taken.

8. Confidentiality

8.1. All concerns will be treated confidentially, and every effort will be made to keep the Whistleblowers identity confidential. However, it must be accepted that it may be possible for the Whistleblower's identity to be determined by the nature of the investigation. This will be explained to the Whistleblower.

9. Support

9.1. The Whistleblower can get support and advice from the Trade Union, HR or seek external advice from agencies such as Acas and Protect www.pcaw.co.uk

9.2. If required, the Union will arrange appropriate support at the conclusion of any process. This might include reconciliation or referral to Occupational Health as required.

10. Protecting the Whistleblower

10.1. BSU will not tolerate any harassment or victimisation of any individual, including a Whistleblower. Disciplinary action will be taken as necessary.

10.2. Staff must not receive any detrimental treatment as a result of raising a genuine concern. This includes dismissal, disciplinary action or unfavourable treatment. Any such actions should be reported to the Whistleblowing Officer immediately.