

PUBLIC INTEREST DISCLOSURE

(Commonly referred to as Whistleblowing Policy)

POLICY and PROCEDURES

Responsibility of	Secretary to the Council
Re-approval Date	May 2015
Review Date	June 2018
Approved by	Audit Committee
Author	D.Hardyman-Rice

ROYAL VETERINARY COLLEGE POLICY and PROCEDURES ON PUBLIC INTEREST DISCLOSURE

(Commonly referred to as Whistleblowing Policy)

INTRODUCTION

The College is committed to conduct its affairs in accordance with the highest standards of openness, probity and accountability. It takes matters of malpractice seriously and like other Public Bodies, the College has a duty to conduct its affairs in a responsible transparent manner, taking into account the requirements of the Committee for Standards in Public Life, of laws, of funding bodies and, with due regard to the College's values of academic freedom, of its Charter and Statutes.

The College believes that if, by whatever means, information which is believed to show malpractice / impropriety within the College is discovered, then this information should be disclosed without the person making the disclosure fearing reprisal or victimisation for their action.

Should employees / workers at RVC make such disclosures, they are protected against being dismissed or penalised under the Public Interest Disclosure Act 1998

concern malpractice / impropriety that has been, is being or is likely to be committed within RVC educational and business activities.

Information that qualifies as a disclosure under this Policy would cover one or more of the following:

- x Financial or non-financial malpractice or impropriety or fraud; *
- x Failure to comply with a legal obligation or with Statutes and Regulations of the College;
- x Miscarriage of Justice;
- x Threat to an individual's health & safety;
- x Damage to the environment;
- x Failure to safeguard RVC assets properly;
- x Academic or professional malpractice; †
- x Attempts to suppress or conceal information relating to any of the above.

* In the event of disclosure of financial irregularities, the College has a Fraud Response Plan, which determines how investigations into

In the event that an individual fears that their position may be jeopardised or when the disclosure channels shown above are inappropriate, the matter should be disclosed <u>in writing</u> to the Director of Human Resources, who will consult an appropriate senior person based on the facts of the disclosure. If the matter is so serious that it cannot be discussed with any of the people identified above to whom disclosure should be made, the Discloser should contact the Chair of the Audit Committee.

In all cases involving financial malpractice, the Secretary to the Council shall act in close consultation with the Principal as the designated 'accounting officer' for the College's public funding and wine tir ofo

and reasonably believes that the Disclosure is substantially true, s/he is a liberty to take the matter further by raising it with certain independent external bodies / individuals:

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Petition to the Visitor

This Policy does not affect the rights of disclosers to raise issues with the Visitor.

The Visitor is the Sovereign acting through the President of the Privy Council. The Visitor can be petitioned to determine disputes arising between the College (as a constituent college of the University of London) and its members. The Visitor's jurisdiction is limited to adjudicating on the interpretation and application of the College's Charter and Statutes provided that the issue is neither a student complaint nor an employment dispute.

RECORD OF OUTCOMES ON DISCLOSURES UNDER THIS POLICY

A record of each disclosure made and action, if any, subsequently taken will be made by the Secretary of the Council and this record will be retained for seven years. In all cases a copy of the disclosure record will be placed before the Audit Committee in the year that the disclosure took place.

REVIEW OF PUBLIC INTEREST DISCLOSURE POLICY

The content and operation of this Policy shall be reviewed after each disclosure event or in the event of no disclosures, every three years or if required by legislative change.

CONTACT NUMBERS

Position	Name	Contact Extension
Secretary to the Council	Mr Ian Darker	6322 or 5533 (Camden)
Principal	Professor Stuart Reid	6960 (Principal's Office)
Chairman of Audit Committee	Mr John Grosvenor	Via 6673 (Sec. to Council's Office)
Chairman of Council	Lord Curry of Kirkharle	Via 6673 (Sec. to Council's Office)
Director of Human Resources	Mrs Cindy Pike	6378
Academic Registrar	Dr Julie Clark	5152