



## Whistleblowing (Public Interest Disclosure) Policy and Procedure

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<b>Version</b>	Version 2.2
<b>Amendments</b>	Version 2.1 – Minor updates made to change LSHTM whistleblowing contact from LSHTM's internal auditors to Interim Secretary to Council. Version 2.2 – Minor updates made to format policy in LSHTM policy template.
<b>Related Policies &amp; Procedures</b>	<a href="#">LSHTM Report &amp; Support Tool</a> <a href="#">Dignity and Respect: Anti-Bullying and Harassment Policy</a> <a href="#">Grievance Policy</a> <a href="#">Disciplinary Policy</a> <a href="#">Student complaints procedure</a> <a href="#">Procedures for inquiring into allegations of research misconduct</a> <a href="#">Reportable Event Procedure</a> <a href="#">Safeguarding Policy</a>

### 1. SCOPE

- 1.1 This policy applies to employees, students, contractors, visitors, and members at London School of Hygiene & Tropical Medicine (LSHTM).
- 1.2 This includes all staff based at The Medical Research Council Unit The Gambia at the London School of Hygiene & Tropical Medicine, and The Medical Research Council/Uganda Virus Research Institute and London School of Hygiene & Tropical Medicine Uganda Research Unit.
- 1.3 Audit & Risk Committee is commissioned by the LSHTM's Governing Body (Council), for overall accountability for ensuring the effective implementation of this policy.



## 2. PURPOSE AND OVERVIEW

**2.1.** Your concerns matter. LSHTM is committed to promoting an open environment where our community feel comfortable raising concerns about relevant laws and regulations, and/or if they consider something is unethical or potentially harmful.

## 3. POLICY

**3.1.** Whistleblowing (Public Interest Disclosure) is the term for the confidential disclosure by an individual of a concern encountered in the workplace relating to a potential wrongdoing. Examples of such wrongdoings include but are not limited to:

- general malpractice such as immoral, illegal or unethical conduct;
- gross misconduct;
- a criminal offence that has been, is being, or is likely to be committed;
- a person who has breached, is breaching, or is likely to breach any legal obligation to which they are subject to (i.e. negligence, or breach of contract);
- potential infractions of relevant regulatory requirements;
- a miscarriage of justice which has occurred, is occurring, or is likely to occur;
- a danger to the health and safety of an individual;
- inappropriate conduct has been, is being, or is likely to be deliberately concealed;
- discrimination of any kind which involves LSHTM or any employees, students; and/or
- any other wrongdoing which will, or may, affect LSHTM's activities or LSHTM's reputation.

**3.2.** This policy is not intended to cover complaints for which LSHTM has existing procedures, such as the Dignity and Respect: Anti-Bullying and Harassment Policy, Grievance Policy, Disciplinary Policy or student complaints procedure, procedures for inquiring into allegations of research misconduct and cannot be used to reconsider any matters which have already been the subject of any of the aforementioned procedures. In addition, the procedure is not intended to query strategic, academic or financial decisions taken by LSHTM; nor may it be used to reconsider any matters that have already been the subject of a formal harassment/bullying at work, grievance or disciplinary procedure.



**3.3.** It should be noted that staff, students, alumni and others are able to use Report and Support, an online tool developed by Culture Shift. Our Report and Support tool enables current and former staff (UK, overseas and Units), students, alumni and others to safely report incidents of bullying, discrimination and harassment anonymously or with contact details. Report and Support also provides information about internal and external support, policies and procedures.

#### **4. PROCEDURE**

##### **4.1. How do I raise a whistleblowing (Public Interest Disclosure) concern?**

- 4.1.1. Should you wish to raise a whistleblowing (Public Interest Disclosure) concern, individuals may contact LSHTM's Interim Secretary to Council, Jocelyn Prudence (Jocelyn.Prunudence@lshtm.ac.uk).
- 4.1.2. LSHTM encourages staff where possible, to put their names to reports made.
- 4.1.3. If your whistleblowing (Public Interest Disclosure) concern involves the Interim Secretary to Council, individuals may contact Chair of Audit & Risk Committee (Hitesh.Patel@lshtm.ac.uk).

##### **4.2. What will happen to your report?**

- 4.2.1. All submissions will initially be assessed by the Interim Secretary to Council and some additional information might be requested at that time. If the concern raised is not determined to be within scope of the Whistleblowing (Public Interest Disclosure) Policy, the Interim Secretary to Council will notify the whistleblower of this outcome and the rationale behind their decision.
- 4.2.2. If the concern is assessed to be within scope, the Interim Secretary to Council will convene an investigation team. Depending on the complexity of the case or the nature of the concern, internal or external legal counsel and technical expertise might be required. All efforts will be made to conduct the investigation in a timely manner and the whistleblower will be updated regularly on its progress.
- 4.2.3. On conclusion of the investigation the investigation team will decide whether corrective actions are required and make recommendations on actions to be implemented. The whistleblower will receive confirmation that the case has been closed and will be informed of the actions taken where appropriate.
- 4.2.4. If the investigation does not resolve the reporter's concern, the whistleblower can lodge an appeal in writing to the Chair of the Audit & Risk Committee, Hitesh Patel (Hitesh.Patel@lshtm.ac.uk).
- 4.2.5. The nominated appeal officer (appointed by the Chair of the Audit & Risk Committee) will write to the whistleblower inviting them to an appeal hearing to discuss the



matter, confirming the right to be accompanied. At the appeal hearing, the decisions taken during the investigation will be considered against the basis for the appeal.

- 4.2.6. The appeal officer will notify the whistleblower in writing of the outcome with reasons, normally within ten days of the appeal hearing. This decision will be final and there will be no further right of appeal.
- 4.2.7. See Annex A for Whistleblowing (Public Interest Disclosure) Process Flow Diagram

#### **4.3. What protection and support is available to me?**

- 4.3.1. Whistleblowers may be - understandably - worried about potential repercussions.
- 4.3.2. The investigative team will always endeavour to keep the identity of the whistleblower confidential and ensure that it remains so after the investigation is concluded unless disclosure is required by law or the regulators.
- 4.3.3. Legal protection is offered to whistleblowers under the Public Interest Disclosure Act and therefore whistleblowers should not suffer any detrimental treatment as a result of raising a concern.
- 4.3.4. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 4.3.5. If you believe that you have suffered any such treatment, you should inform the interim Secretary to Council immediately.
- 4.3.6. LSHTM's Employee Assistance Programme and confidential helpline (0800 028 0199) is available to all LSHTM staff regardless of role or location and gives access to an independent and confidential support and services.

## Annex A – Whistleblowing (Public Interest Disclosure) Process Flow Diagram

