

## **LSE WHISTLEBLOWING POLICY (PUBLIC INTEREST DISCLOSURE)**

### **1. POLICY STATEMENT**

1.1. LSE (the “**School**”) is committed to the highest standards of ethical practice, behaviour and integrity among its staff and students. The School encourages the reporting of any genuine concerns of wrongdoing and commits to ensuring that individuals are not adversely affected as a result of reporting such wrongdoing.

1.2. As such, the aim of this Policy is:

- i. To encourage individuals to report suspected serious wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate;
- ii. To provide individuals with guidance as to how to raise those concerns;
- iii. To provide a transparent and confidential process for dealing with concerns;
- iv. To ensure individuals are aware that they are able to raise genuine concerns in good faith without fear of reprisal; even if they turn out to be mistaken;
- v. To support the School's Ethics Code.
- vi. To support the School's zero tolerance approach to dishonest behaviour, malpractice and misconduct including fraud, bribery and corruption as set out in the School's policy against bribery and fraud.

### **2. WHO IS COVERED BY THIS POLICY?**

2.1 This Policy applies to all individuals, whether studying (“**Students**”) or working at the School, including contracted and visiting staff, consultants and members of Court (Governors) and Council (referred to hereafter as “**Staff and Governors**”), regardless of any protected characteristics.

2.2 This policy has been designed to ensure that no-one receives less favourable treatment due to the protected characteristics of age, disability, gender (including gender identity), ethnicity and race, religion or belief, sexual orientation, marriage and civil partnership, pregnancy and maternity and social and economic background.

2.3 This Policy may be amended at any time and individuals will be able to access the latest version via the [Policies](#) pages of the School website.

### **3. WHAT IS WHISTLEBLOWING?**

3.1 Whistleblowing is the disclosure of information which relates to suspected serious wrongdoing or dangers relating to the running of the School or to the work-related activities of Staff. This may include, but is not limited to, information relating to:

- 3.1.1.1 a criminal offence has been, is being or is likely to be committed;
- 3.1.1.2 a person has failed, is failing, or is likely to have failed to comply with a legal or regulatory obligation, or to instrument of governance to which they are subject;
- 3.1.1.3 a miscarriage of justice has occurred, is occurring or is likely to occur;

- 3.1.1.4 the health and safety of an individual has been, is being, or is likely to be endangered;
- 3.1.1.5 the environment has been, is being or is likely to be damaged;
- 3.1.1.6 Fraud;
- 3.1.1.7 Corruption, bribery or blackmail;
- 3.1.1.8 Administrative malpractice (financial such as improprieties in matters of financial reporting or non-financial);
- 3.1.1.9 Failure to properly safeguard assets;
- 3.1.1.10 Obstruction or frustration of the exercise of academic freedom;
- 3.1.1.11 Academic or professional malpractice (including, for instance, violation of intellectual property rights or failure of integrity in research);
- 3.1.1.12 Improper conduct or unethical behaviour;
- 3.1.1.13 Bullying and Harassment;
- 3.1.1.14 Unauthorised disclosure of confidential information;
- 3.1.1.15 Serious breach of the LSE Ethics Code; and
- 3.1.1.16 Suppression or concealment of any of the above matters.

A **whistleblower** is a person who raises a genuine serious concern in good faith relating to any of the above. The whistleblower may or may not be directly affected by the matter.

- 3.2 If a Student or member of Staff or Governor is uncertain whether something is within the scope of this Policy, they should seek advice from the School Secretary; whose contact details are at section 10. They may also contact Public Concern at Work, which is an independent whistleblowing charity, and has a hotline for advice. See section 11 for details.
- 3.3 All disclosures should be made with the “reasonable belief” that it is in the public interest. Public interest is dependent on a number of factors including the number of workers affected, the nature of interests affected, the nature of the wrongdoing and the identity of the alleged wrongdoer. Complaints that relate to a personal grievance are not usually covered by whistleblowing law. Personal grievances can be addressed through the School’s grievance procedures.
- 3.4 All UK employees are protected under the Public Interest Disclosure Act 1998.

#### **4. RAISING A WHISTLEBLOWING CONCERN**

- 4.1 Any individual as defined in paragraph 2.1 may raise a concern in the first instance with a Head of Department, Service Leader, line manager, trade union representative, officer of the Students' Union or colleague. The person notified may be able to agree a way of resolving the concern quickly and effectively or may refer the matter to the School Secretary, or a Pro-Director if the concerns relate to the School Secretary, on behalf of the student, member of Staff or Governor.
- 4.2 Where the matter is more serious, or the individual feels that the person that they notified has not addressed their concern, or the student, member of Staff or Governor prefers not to raise it with them for any reason, they should raise the concerns in the manner set out below:
  - 4.2.1.1 Concerns should be submitted in writing to the School Secretary, unless the School Secretary is the subject of the concern or is in some way implicated in it (in which case paragraph 5.4 applies).
  - 4.2.1.2 Where a concern relates to the School Secretary, the student, member of Staff or Governor may refer the matter to a Pro-Director.

4.2.1.3 If the student, member of Staff or Governor considers it inappropriate to raise the concern with either the School Secretary or a Pro-Director, they may refer the matter to the Chair of the Audit Committee.

4.2.1.4 Contact details are at section 10.

4.3 An individual is not required to classify the type of wrongdoing – it is sufficient to raise a concern that they believe that there is or has been an act of wrongdoing.

4.4 An individual may prefer not to raise the matter directly with a member of the LSE community according to the procedure above, they may call an independent whistleblowing service to which the School subscribes:

UK Freephone number: 0800 374 199.

Email: [lse@expolink.co.uk](mailto:lse@expolink.co.uk),

Direct Link to Web-Reporting: <https://wrs.expolink.co.uk/lse>  
or: [www.wrs.expolink.co.uk](http://www.wrs.expolink.co.uk) and the access code: **LSE**

Such concerns will be discussed, anonymously if required, by the company's own staff, who will take the matter up with the correct School personnel on the individuals behalf.

## 5. INVESTIGATION AND OUTCOME

5.1 In all cases where a concern is raised under paragraph 4.2, the person to whom the concern is reported will acknowledge its receipt and keep a record of action taken. This will include an initial assessment to determine the scope of any investigation.

5.2 If, on preliminary examination, the concern is judged to be wholly without substance or merit, no further action will be taken, and the whistleblower will be informed accordingly.

5.3 The relevant officer outlined in 4.2 may appoint another person to undertake the investigation on their behalf. Where there is an investigation, the person or persons identified as the subject of the concern will be informed of each allegation made against them and any evidence supporting it and will be allowed to comment before the investigation is concluded.

5.4 The School Secretary/ a Pro-Director /Chair of Audit Committee will aim to keep the whistleblower informed of who is handling the matter, the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent them from giving the whistleblower specific details of the investigation or any disciplinary action taken as a result. The whistleblower should treat any information about the investigation as confidential.

5.5 Upon the conclusion of an investigation, the School Secretary/ a Pro-Director/Chair of Audit Committee will let the whistleblower know the outcome. The School Secretary/ a Pro-Director/Chair of Audit Committee is also responsible for the submission of a report to the Audit Committee. The Audit Committee must also be made aware of any concerns dismissed after preliminary examination.

## 6. IF THE WHISTLEBLOWER IS NOT SATISFIED

6.1 If the whistleblower is not satisfied with the way in which their concern has been handled because either:

- (a) They believe the procedures have not been followed properly;
- (b) There is evidence of prejudice or bias; or
- (c) There is further evidence which was not available at the time the original concerns were raised;

there is a right of appeal **on these grounds only** to the Director, or if the allegation relates to the Director, to the Chair of Court and Council (“Chair”).

6.2 The Director (or the Chair) will decide if the case meets the grounds for appeal (as set out above). If it does, they will appoint an independent lay member of Council to hear the appeal.

6.3 The Director (or the Chair) will let the whistleblower know the outcome of the appeal. The Director (or the Chair) is also responsible for the submission of a report to the Audit Committee. The Audit Committee must also be made aware of any appeals dismissed after preliminary examination.

6.4 If a Student whistleblower is not satisfied by the process or outcome of the procedure, they may be entitled to refer the matter to the Office of the Independent Adjudicator.

## **7. CONFIDENTIALITY AND ANONYMITY**

7.1 The School hopes that Students, Staff and Governors will feel able to voice whistleblowing concerns openly under this Policy. It is helpful for the School to know the identity of the whistleblower in order to conduct a fair and effective investigation of the complaint.

7.2 However, if an individual wants to raise a concern anonymously directly to the School via the procedure outlined in 4.1-4.2 above, the School will make every effort to keep their identity confidential. An individual’s identity will not be disclosed without prior consent.

7.3 Additionally, if an individual wants to raise a concern anonymously via the independent whistleblowing hotline described under 5.3 above, the School will proceed with an investigation on the basis of all the information disclosed to it by the company, and agreed to be disclosed by the whistleblower.

7.4 In all instances, anonymous complaints will be investigated or acted upon under this procedure, as the person receiving the complaint sees fit, having regard to the seriousness of the issue raised, the credibility of the complaint, the prospects of being able to investigate the matter, and fairness to any individual mentioned in the complaint.

7.5 For further independent advice, students can seek advice from the Students' Union and Staff can seek advice from Public Concern at Work, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this Policy.

7.6 Data stored on individuals is compliant with General Data Protection Regulations (GDPR). Further information on the data that is held can be found in the School’s information Asset Register. All queries should be directed to [GLPD.Info.Rights@lse.ac.uk](mailto:GLPD.Info.Rights@lse.ac.uk).

## **8. PROTECTION FOR WHISTLEBLOWERS**

- 8.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. As such, the School aims to encourage openness and will support Students, Staff and Governors who raise genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- 8.2 If the School concludes that an individual has made malicious allegations, in bad faith or with a view to personal gain, that individual will be subject to disciplinary action under the School's relevant procedure.
- 8.3 Students, Staff or Governors will not suffer any detrimental treatment as a result of raising a concern without malice, in good faith, reasonably believing it to be true. Detrimental treatment includes but is not limited to suspension/removal from studies, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If the whistleblower believes that they have suffered any such treatment, then they should inform the relevant contact (listed in section 10) immediately. If the detrimental treatment is not remedied, the whistleblower should raise it formally using the School's [Harassment Policy](#).
- 8.4 Students, Staff and Governors must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

**9. OVERSIGHT AND OWNERSHIP**

- 9.1 Council has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this Policy. The Ethics Policy Committee and Audit Committee support Council with monitoring the Policy.

**10. CONTACTS**

10.1 Contact addresses and numbers for those mentioned in the procedure are:

	<b>Address</b>	<b>Tel</b>	<b>Email</b>
School Secretary	Secretary's Office London School of Economics & Political Science Houghton Street, London WC2A 2AE	020 7955 4959	<a href="mailto:secretary@lse.ac.uk">secretary@lse.ac.uk</a>
Pro-Directors	Directorate London School of Economics & Political Science Houghton Street, London WC2A 2AE	020 7955 7077	<a href="mailto:Directorsoffice@lse.ac.uk">Directorsoffice@lse.ac.uk</a>
Director	Directorate London School of Economics & Political Science Houghton Street, London WC2A 2AE	020 7955 6575	<a href="mailto:Directorsoffice@lse.ac.uk">Directorsoffice@lse.ac.uk</a>
Chair of Council	c/o Secretary's Division London School of Economics & Political Science Houghton Street, London WC2A 2AE	c/o 020 7955 7554	Correspondence marked for the private and confidential attention of the Chair of Court & Council or Chair of Audit Committee can be sent via the Governance team in the Secretary's Division.
Chair of Audit Committee	c/o Secretary's Division London School of Economics & Political Science Houghton Street, London WC2A 2AE	c/o 020 7955 7825	
Public Concern at Work	CAN Mezzanine 7 - 14 Great Dover Street	020 7404 6609	<a href="mailto:whistle@pcaw.org.uk">whistle@pcaw.org.uk</a>

(independent  
whistleblowing  
charity hotline)  
WHISTLEBLOWI  
NG HOTLINE

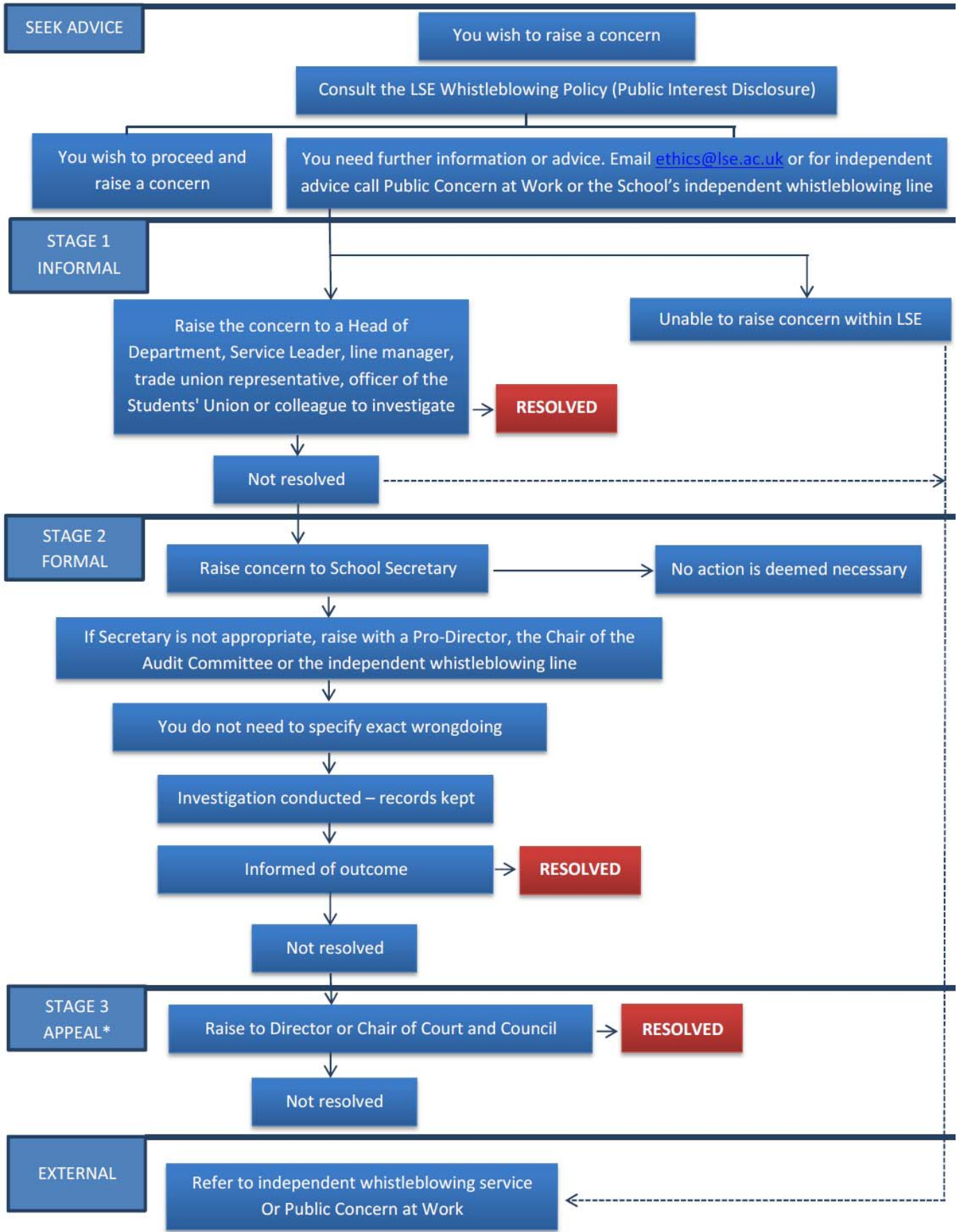
London SE1 4Y

Direct Link to Web-Reporting:  
<https://wrs.expolink.co.uk/lse>  
Or: [www.wrs.expolink.co.uk](http://www.wrs.expolink.co.uk) and the  
access code: **LSE**

Freephone [lse@expolink.co.uk](mailto:lse@expolink.co.uk)  
number:  
0800 374  
199

## 11. FURTHER INFORMATION

- 11.1 This Policy is designed to facilitate the disclosure of genuine concerns of wrongdoing. However, such disclosure must be in the public interest. This means that any such disclosure must affect others, for example, the general public, or other Staff, Governors and Students.
- 11.2 Concerns may be raised by any member of Staff, Governor or Student. Concerns that are not of a public interest nature, or those which fall into an area covered by another procedure, will not be considered under this Policy. Any such concerns may be considered under other policies and procedures of the School.
- 11.3 For the avoidance of doubt, this Policy cannot be used in order to re-open or review a matter that is currently, or has already been decided, under one of the School's other procedures.
- 11.4 The aim of this Policy is to provide an internal process for reporting, investigating and remedying any suspected wrongdoing at the School. As such, while it is accepted that in some circumstances it may be appropriate to report concerns to an external body, such as a regulator, the School recommends that the internal process be used in the first instance. However, please note that if external disclosure is necessary, the independent whistleblowing charity, Public Concern at Work, operates a confidential helpline and also provides a list of prescribed regulators for reporting concerns.
- 11.5 Whistleblowing usually relates to the conduct of Students and/or Staff and/or Governors but can sometimes relate to the actions of a third party, such as a supplier or service provider. The law allows Staff to raise a concern in good faith with a third party, where they reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, the School encourages Staff and Governors to report such concerns internally first. Staff and Governors should seek guidance from the relevant contact listed in section 10 above.



All concerns raised will be treated as **confidential**.  
 You will not suffer detriment if you raise a concern in good faith. However, if you make malicious allegations in bad faith or with a view to personal gain, you will be subject to disciplinary action under the School's relevant procedure.

**\* PLEASE REFER TO THE WHISTLEBLOWING POLICY FOR GROUNDS OF APPEAL**

**Review schedule**

<b>Review interval</b>	<b>Next review due by</b>	<b>Next review start</b>
3 years	May 2019	Jan 2019

**Version history**

<b>Version</b>	<b>Date</b>	<b>Approved by</b>	<b>Notes</b>
1.0	17 May 2016	Council	
1.1	October 2017	SMC	Minor updates
1.2	May 2018	SMC	Minor updates

**Contacts**

<b>Position</b>	<b>Name</b>	<b>Email</b>	<b>Notes</b>
Ethics Manager	Stephanie Allison	<a href="mailto:ethics@lse.ac.uk">ethics@lse.ac.uk</a>	Author