

Speak Up (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. Where anyone has concerns we hope that these can be easily resolved. The School encourages staff to speak up and report any genuine concerns of wrongdoing. As speaking up and raising concerns can be difficult, this policy provides guidance to enable staff to do so and a commitment to ensuring that individuals are not adversely affected as a result of reporting concerns.

1.2. The aim of this Policy is:

- i. To encourage staff to speak up and 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 speak up and raise those concerns, including how to raise concerns anonymously;
- 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 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. The Public Interest Disclosure Act legal protections apply to employees and workers. This Policy applies to individuals, contractually connected to the School, including staff, visiting staff, consultants and members of Council, regardless of any protected characteristics.
- 2.2. Students are encouraged to raise any concerns through the School's Student Complaints Procedure.
- 2.3. 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.

3. What Is Whistleblowing?

- 3.1. Whistleblowing is the disclosure of information, which relates to suspected wrongdoing or dangers relating to the running of the School or to the work-related activities of Staff. These disclosures must be in the public interest. Whistleblowing is also commonly known as 'speaking up'.
- 3.2. Wrongdoing may include, but is not limited to, information relating to:
 - a criminal offence;
 - failure to comply with legal obligations;
 - failure to comply with School policies, regulations and codes of practice, financial or non-financial maladministration or malpractice or impropriety or fraud;
 - academic or professional malpractice (including, for instance, violation of intellectual property rights, failure of integrity, or other academic misconduct);
 - a risk to the health or safety of any individual;
 - environmental damage;
 - a miscarriage of justice;
 - attempts to suppress or conceal any information relating to any of the above.
- 3.3. A **whistleblower** is a person who raises a genuine serious concern relating to any of the above categories of wrongdoing. The whistleblower may or may not be directly affected by the matter but the matter must also affect others.
- 3.4. If an individual 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 Protect, which is an independent whistleblowing charity which operates an advice hotline.
- 3.5. All disclosures should be made with the view that it is in the public interest. This means that any such disclosure must affect others, for example, the general public, or other members of staff.
- 3.6. 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. For example, where the concerns relate to research

integrity or research misconduct the investigation shall be conducted in accordance with the Code of Research Misconduct. Allegations of Fraud and Bribery shall be investigated in accordance with the Schools' anti-bribery policy.

- 3.7. Complaints that relate to a personal grievance are not usually covered by whistleblowing law. Staff grievances can be addressed through the School's grievance procedures.
- 3.8. 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.
- 3.9. All UK employees are protected under the Public Interest Disclosure Act 1998.
- 3.10. This Policy provides 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, Protect, operates a confidential helpline and also provides a list of prescribed regulators for reporting concerns.
- 3.11. Whistleblowing or speaking up 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 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 reporting of such concerns internally first. Advice and guidance can be sought from the contacts listed in section 10.

4. Making a disclosure

- 4.1. Any individual as defined in paragraph 2.1 may raise a concern. Although not required it can be helpful if the individual can state how they believe their concern to be in the public interest to state, the type of wrongdoing being reported (3.2) and provide supporting evidence.
- 4.2. Disclosures can be made directly with their Head of Department or Service Leader in writing or in person at a face-to-face meeting. Where reports are raised with line managers they should be referred to the relevant Head or Department or Service Leader. The person notified will aim to resolve the concern quickly and effectively or will refer the matter to the School Secretary.
- 4.3. Where the matter is more serious, where the individual feels that the person that they notified has not addressed their concern, or they prefer not to raise it with their Head of Department or Service Leader for any reason, they should raise the concerns:
 - verbally (in person or by phone) or in writing with 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 4.7 applies).
 - through the independent whistleblowing service to which the School subscribes: EQS Integrity Line: <https://lse.eqs-integrity.org/>. This externally service enables individuals to make named or anonymous reports where their name is not provided. The system allows for two-way communication with anonymous reporters. Integrity Line provides secure hosting and is GDPR compliant and supports access on a need-to-know basis. Reports made through Integrity Line are directed to the School Secretary.
- 4.4. The person notified will aim to resolve the concern quickly and effectively or will refer the matter to the School Secretary, or the Pro-Director for Faculty Development if the concerns relate to the School Secretary, on behalf of the reporting individual .

- 4.5. Individuals making a disclosure may be advised and supported by trade union representatives.
- 4.6. Heads of Department and Service Leaders, who receive reports may seek advice and guidance from the Secretary's Division (ethics@lse.ac.uk) or Human Resources (Humanresources@lse.ac.uk).
- 4.7. Where a concern relates to the School Secretary, the reporting individual may refer the matter to the Pro-Director for Faculty Development. If the reporting individual considers it inappropriate to raise the concern with either the School Secretary or the Pro-Director for Faculty Development, they may refer the matter to the Chair of the Audit Committee.
- 4.8. All contact details are at section 10.

5. Investigation And Outcome

- 5.1. In all cases where a concern is raised under section 4, the person to whom the concern is reported will acknowledge its receipt within 5 working days 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 and no further action will be taken or if the concern should be considered under a different School procedure the whistleblower will be informed accordingly.
- 5.3. Where appropriate the matter may be referred for investigation under the relevant School policy, grievance or disciplinary procedure.
- 5.4. The relevant officer outlined in 4.3 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.
- 5.5. The School Secretary/ Pro-Director for Faculty Development/ Chair of Audit Committee will acknowledge the report within 5 working days and will keep the whistleblower informed of who is handling the matter, the progress of the investigation and its likely timescale. Timescales can vary greatly depending on the nature of the concerns, however the investigation should normally be completed and the outcome reported within three months of the disclosure.
- 5.6. The School Secretary/ Pro-Director of Faculty Development /Chair of Audit Committee will consider the need for confidentiality, keeping the details of the reporter or details of the report private. The need for confidentiality may limit the provision of specific details of the investigation or any actions taken as a result. The whistleblower and those who contribute to the investigation should treat any information about the investigation as confidential.
- 5.7. Upon the conclusion of an investigation, the School Secretary/ Pro-Director Faculty Development/ Chair of Audit Committee will let the whistleblower know the outcome. The School Secretary/ Pro-Director Faculty Development/ 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 material evidence which was not available at the time the original concerns were raised;
 - d. or the decision reached was unreasonable;
- 6.2. There is a right of appeal within four weeks of receiving the outcome on these grounds only to the Chief Operating Officer, or if the allegation relates to the Chief Operating Officer, to the Director.
- 6.3. The Chief Operating Officer, (or the Director) will decide if the case meets the grounds for appeal (as set out above). If it does, they will appoint the Chair of the Audit Committee to hear the appeal. If the appeal does not meet more than one of the ground for appeal it can be dismissed. Where the Chief Operating Officer has a conflict of interest, they shall nominate a relevant officer to decide if the case meets the grounds for appeal.
- 6.4. The Chief Operating Officer (or the Director or the Chair of Audit Committee) will let the whistleblower know the outcome of the appeal. The Chief Operating Officer (or the Director) 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.

7. Confidentiality And Anonymity

- 7.1. The School hopes that individuals will feel able to speak up and 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.
- 7.2. The School will protect all whistleblowers' confidentiality ensuring that a minimum number of people are aware of the reporters identity, with prior consent. Failure to maintain confidentiality could result in disciplinary action. Confidentiality cannot be assured where the disclosure of the identity is required by law, for example in relation to criminal offences
- 7.3. In all instances, anonymous complaints will be investigated or acted upon under this procedure, as the person receiving the complaint sees as reasonably practicable. Investigating anonymous concerns is more difficult and the scope of the investigation will depend on 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.
- 7.4. For further independent advice, staff can seek advice from Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this Policy.
- 7.5. 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.

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 Staff who raise genuine concerns 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. Staff must not suffer any detrimental treatment as a result of raising a concern without malice, reasonably believing it to be true. Detrimental treatment includes but is not limited to dismissal, disciplinary action, victimisation, threats, attempts to identify a whistleblower or other unfavourable treatment connected with raising a concern. Whistleblower's who believe they have suffered any such treatment, are encouraged to inform the relevant contact (listed in section 10) immediately. If the detrimental treatment is not remedied, the whistleblower should raise it formally using the relevant grievance or disciplinary procedure.
- 8.4. The School has a zero tolerance approach to victimisation of whistleblowers. staff must not threaten, victimise or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

9. Oversight And Ownership

- 9.1. The School Management Committee (SMC) has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this Policy. The Ethics Management Board and Audit Committee support SMC with monitoring the Policy.
- 9.2. This Policy may be amended at any time and the latest version will be available via the Policies pages of the School website.

10. Contacts

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

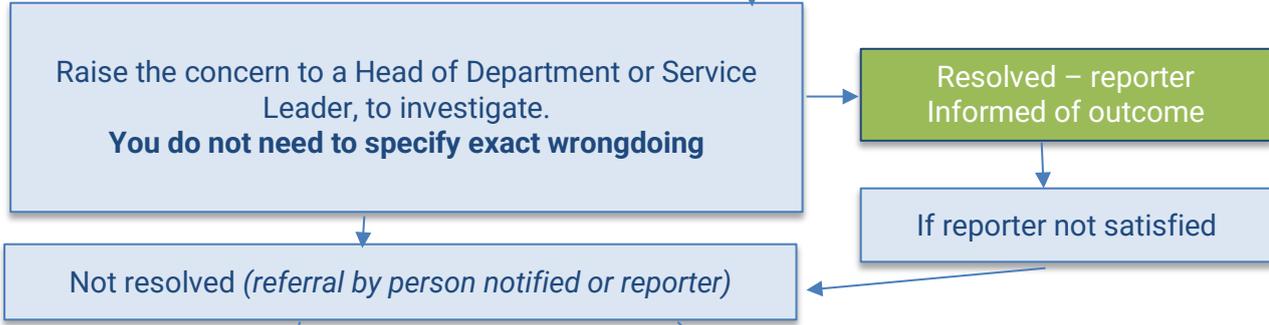
	Address	Tel	Email
School Secretary	Secretary's Office London School of Economics & Political Science Houghton Street, London WC2A 2AE	020 7955 4959	secretary@lse.ac.uk or via https://lse.eqs-integrity.org/
Pro-Director Faculty Development	Directorate London School of Economics & Political Science Houghton Street, London WC2A 2AE	020 7955 7077	Directorsoffice@lse.ac.uk or via https://lse.eqs-integrity.org/
Director	Directorate London School of Economics & Political Science Houghton Street, London WC2A 2AE	020 7955 6575	Directorsoffice@lse.ac.uk or via https://lse.eqs-integrity.org/
Chair of Council	Private and confidential for the attention of the Chair of Council c/o Secretary's Office London School of Economics & Political Science Houghton Street, London WC2A 2AE	c/o 020 7955 7554	secretary@lse.ac.uk or via https://lse.eqs-integrity.org/

Chair of Audit Committee	Private and confidential for the attention of the Chair of Audit c/o Secretary's Office London School of Economics & Political Science Houghton Street, London WC2A 2AE	c/o 020 7955 7825	secretary@lse.ac.uk or via https://lse.eqs-integrity.org/
Protect (independent whistleblowing charity hotline)	The Green House 244-254 Cambridge Heath Road, London E2 9DA	020 3117 2520	whistle@protect-advice.org.uk or https://protect-advice.org.uk/contact-protect-advice-line/
LSE's whistleblowing service - Integrity Line	https://lse.eqs-integrity.org/		

SEEK ADVICE



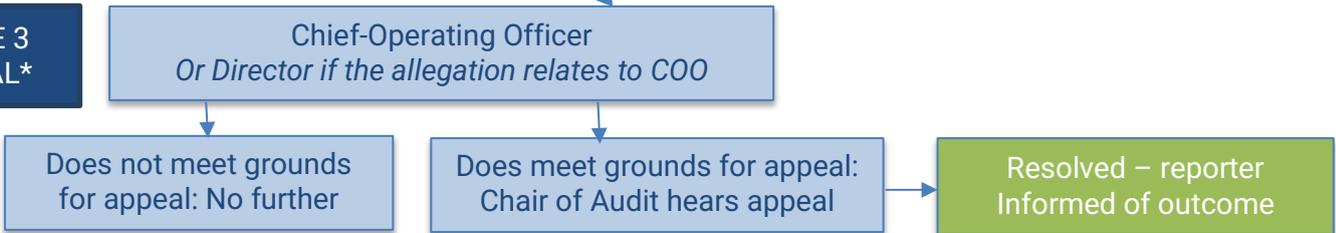
STAGE 1 INFORMAL



STAGE 2 FORMAL



STAGE 3 APPEAL*



All concerns raised will be treated as **confidential**.
 You will not suffer detriment if you raise a concern. 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

Review interval	Next review due by	Next review start
3 years	May 2025	Jan 2025

Version history

Version	Date	Approved by	Notes
1.0	May 2016	Council	
1.1	October 2017	SMC	Minor updates
1.2	May 2018	SMC	Minor updates
1.3	May 2019	SMC	Minor updates
1.4	May 2022	SMC	Minor updates

Contacts

Position	Name	Email	Notes
Ethics Manager	Stephanie Allison	ethics@lse.ac.uk	Author

Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy	Yes
If Yes, please give details: Whistleblowing/Speak up training to be provided to responsible officers and HR partners across the School; Whistleblowing policy information included in all staff induction ethics sessions; Whistleblowing policy referred to in the Ethics at LSE module that all staff are asked to complete.	