

Executive Summary

ROYAL VETERINARY COLLEGE

CODE OF PRACTICE ON PUBLIC INTEREST DISCLOSURE (COMMONLY KNOWN AS 'WHISTLEBLOWING')

The Public Interest Disclosure Act 1998 ("the Act") gives legal protection to employees against being dismissed or penalised by their employers when they make a protected disclosure or concern which is in the public interest.

1 When to use this Code of Practice

The scope of this procedure covers the disclosure of information which, in the reasonable belief of the employee making the disclosure, covers the following employer activities:

Financial

- financial malpractice or impropriety or fraud; failure to properly safeguard assets

Legal

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

Environmental

- the health and safety of an individual has been, is being, or is likely to be endangered
- the environment has been, is being, or is likely to be damaged

Conduct and Behaviour

- academic or professional malpractice
- improper conduct or unethical behaviour
- scientific misconduct

Information relating to the above that is being deliberately concealed.

2 Who can use this Code of Practice

- employees of the College / students of the College
- Fellows of the College
- Members of the Council of the College and its sub-committees
- employees of companies and organisations having a contractual relationship with the College, either direct or indirect
- any person having dealings with the College who might suffer a detriment as a result of making a disclosure.

3 What Happens When You Make a Public Interest Disclosure

Your first step – Read the Code of Practice on Public Interest Disclosure to see if your concerns fall within the scope of the procedure. This is available on the College Intranet site.

4 If you decide to make a disclosure

Other than in exceptional circumstances, all disclosures should be raised internally in the first instance. Report your concern to your Head of Department or report them in writing to the Assistant Principal and Secretary to the Council or the Director of Human Resources who will decide if the disclosure is covered by the Act.

If it is, the Assistant Principal and Secretary to the Council will decide how to investigate the allegations. If not, you will be informed why the allegation is not covered by the Act.

5 Investigation

An impartial investigation will look into the substance of the disclosure. Depending on the nature of the case, this may involve getting information from the people directly involved. If evidence suggests a crime has occurred, the investigation procedures in the Fraud Response Plan will be used.

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6 Acting on Disclosures

After the investigation the College will decide if there is enough evidence to substantiate the disclosure.

Substantiated: as a result of the investigation, necessary and reasonable action will be taken to:

- Prevent the conduct recurring;
- Discipline any person responsible for the conduct; and
- Pursue criminal charges when appropriate.

Unsubstantiated: the College will write to you to tell you about the decision.

If you do not agree with the decision or the actions taken, you can contact the Principal for further investigation. If, having exhausted this procedure, you are not satisfied with the College's response and reasonably believes that the information disclosed, and any allegation contained in it, are substantially true, you are at liberty to take the matter further by raising it with certain bodies or persons.

7 At any stage, the College may decide not to take further action on the disclosure if:

- they think the disclosure has no basis;
- they think it has already been dealt with adequately; or
- there is a more appropriate remedy reasonably available.

8 Principal Contact for Further Information:

Mrs Elaine Acaster - Assistant Principal and Secretary to the Council (Ext - Hawkshead 6322; Camden 5533)

9 Disclosures:

Complaint Relates to	Disclosure to
Colleague	Head of Department
Head of Department	Assistant Principal and Secretary to the Council
Director of Finance	Assistant Principal and Secretary to the Council and Chair of Audit Committee
Assistant Principal and Secretary to the Council / Deputy / Vice - Principal	Principal
Principal / Council Member	Assistant Principal and Secretary to the Council
Chairman of the Council	Chairman of the Audit Committee