











- 5.4. If a member of staff or an associate is found to have raised a concern maliciously or vexatiously, they will lose the protection of the Whistleblowing Policy and may be subject to disciplinary action under ( ) ( " @HR-005) or their policy.
- 5.5. All concerns will be treated in confidence and every effort will be made not to reveal in so far as this is consistent with the proper examination and investigation of the matter. No one should seek to identify those involved where their identity has not been disclosed as part of proper examination and investigation. If it is necessary to reveal the identity as part of proper examination and investigation, this will be discussed with them at the earliest possible stage of the process.
- 6.1. The Whistleblowing Policy and procedure complement but do not replace existing procedures; staff should use the procedures in this section when the others are not appropriate.
- 6.2. The Institute ( " @HR-004) exists for staff to raise personal employment-related grievances. Further information on the difference between Whistleblowing and grievances are outlined in section 7. In addition, the Institute ( # (BI-HR-001

Examples of the difference between a grievance and a protected disclosure





- 10.5. The investigation procedure will be conducted as quickly as possible. A decision letter outlining the outcome of the investigation will be sent to the individual and Respondent at the conclusion of the investigation.
- 10.6. Dependent upon the outcome of the investigation and the employment status of the Respondent ( [hr@babraham.ac.uk](mailto:hr@babraham.ac.uk) ) ( [hr@hr-005](mailto:hr@hr-005) ) may be taken.
- 10.7. The Whistleblowing Response Plan (Appendix 2) gives additional guidance on the conduct of the investigation and how the outcome of the investigation will be reported.
- 11.1.1. All those involved (individual or Respondent) have the right to appeal against the outcome of the original investigation. The purpose of the appeal is to review the outcome of the original investigation and the basis upon which the original decision was made.
- 11.1.2. The appeal should indicate the full grounds upon which it is made and must be sent in writing within seven working days of receipt of the decision letter. Details of the person to whom the appeal should be sent will be included in the decision letter sent at the end of the formal investigation or the end of the disciplinary hearing.
- 11.1.3. The appeal will be heard by a person who has had no previous involvement in the case. In exceptional cases the appeal may be heard by someone from outside of the Institute. The person hearing the appeal will be accompanied by an HR professional.
- 11.1.4. The person hearing the appeal will notify their decision to all relevant people, in writing, normally within ten working days.
- 11.1.5. The possible outcomes are as follows:
- Uphold the current decision, i.e., confirm the outcome of the original investigation, thereby rejecting the appeal.
  - Amend the current decision, i.e., substitute an alternative form of action. The decision could be changed in some way, e.g., any actions required might be redefined in some way.
  - Overturn the current decision, i.e., set aside the original decision, thereby upholding the appeal.
- 11.1.6. The Whistleblowing Response Plan (Appendix 2) gives additional guidance on the appeals procedure.
- 12.1. An individual can make a disclosure to the contacts at the Institute noted in 9.3 without following this procedure, or at any point in the procedure, if:
- They reasonably believe that they will be victimised if they raise the matter at a lower level or have suffered an identifiable detriment.
  - They reasonably believe that evidence is likely to be concealed or destroyed.

They have previously raised their concern



Maintaining a whistleblowing register. This will include all monitoring and handling of reports.

The Investigating Officer is appointed by HR. They should:

Fairly and objectively carry out a full investigation.

When the investigation is concluded, send the findings to HR.

The Fraud and Bribery Policy (BI-COR-007) is supplementary to this response plan for cases of actual or suspected fraud or bribery.

In the case of involvement or a conflict of interest of any of the named roles described in this response plan, alternative staff will be appointed by the COO, Chair of the Audit Committee or Head of HR.

Flowcharts for the whistleblowing and appeals procedures are at the end of this appendix.

Under the Whistleblowing Policy, individuals are encouraged to report concerns to their ~~line~~ alternative

policies may need to be considered (e.g., Fraud & Bribery Policy [BI-COR-007], Research Misconduct Policy [BI-RES-004], Safeguarding Policy [BI-HAS-003], Disciplinary Policy [BI-HR-005] etc.) and the format of the investigation.

In most cases, the investigation will be carried out by a senior manager at the Institute (Investigating Officer). If the concerns involve, or may involve, a specific staff member or associate, the investigation will be dealt with by an Investigating Officer who is at least one pay band higher than the Respondent. There

If at any stage of the investigation the Investigating Officer feels that the police should be involved, the Investigating Officer will contact the Head of HR and the COO. Any decision to notify the police will be made following discussion between COO, Head of HR and relevant Heads of Department, and with the agreement of the Institute Director. In particular, consideration will be given as to whether civil or criminal proceedings should be undertaken in order to protect the Institute







