



WHISTLEBLOWING POLICY



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1. Policy Statement

LSE Students' Union is committed to conducting our business with honesty and integrity. We have prepared this policy to enable you to raise any concerns about malpractice at an early stage and in the right way.

This process outlines how serious allegations about standards, conduct, financial irregularity, or possible unlawful action can be made whilst ensuring confidentiality. This includes protection for individuals who report sexual harassment or related misconduct as a qualifying disclosure under whistleblowing legislation. The policy protects those making allegations in the reasonable belief that it is in the public interest to do so and they should not be disadvantaged, victimised or discriminated against.

This policy does not replace other procedures such as the complaints procedure, the Grievance and Dignity at Work policies. This policy is intended to ensure that LSE Students' Union complies with its duty under the [Public Interest Disclosure Act 1998](#).

2. Scope

- This procedure applies to all LSE Students' Union workforce, including workers, trustees, volunteers, contractors and associates.
- This procedure also applies to Members of LSESU as defined under the Articles of Association.
- This policy does not replace or replicate other procedures. For example, if an employee has a grievance about their working conditions or the conduct of a fellow team member, they should use the Grievance policy or, if they felt that a colleague or their manager was treating them unfavourably, they should use the Dignity at Work policy.

3. Principles

The Union has a statutory duty to conduct its affairs in a responsible way and to take into account the requirements of funding bodies as well as the standards in public life detailed in Lord Nolan's Reports. The Union is committed to our shared values and therefore permit employees and members to speak freely and without being subject to disciplinary sanctions or victimisation providing that they do so lawfully, without malice, and in the public interest. When handling whistleblowing concerns, the Union shall:

- Take all reasonable steps to deal with the matter as expeditiously as possible.
- Take all reasonable steps to protect the confidentiality of whistle blowers unless
 - they waive their rights to confidentiality, or
 - unless the person dealing with a concern determine that confidentiality is incompatible with the implementation of fair disciplinary proceedings, or
 - there is otherwise an overriding reason for disclosure.
 - Persons raising a concern shall be informed if for whatever reason their anonymity is not to be maintained.

- Treat any reprisals against or victimisation of a whistle blower as a serious disciplinary matter.

4. What is Whistleblowing?

“Whistleblowing” is the disclosure of information which relates to suspected wrongdoing, unethical practice or dangers at work, this may include:

- Abuse of authority.
- Alleged miscarriage of justice.
- Conduct which is an offence or breach of the law.
- Serious Health and Safety risks.
- Possible fraud and corruption.
- Disclosures relating to sexual harassment, sexual misconduct, or a failure to take reasonable steps to prevent sexual harassment, where the disclosure is made in the reasonable belief that it is in the public interest.
- The unauthorised use of public funds (including the misuse of Student Group funding).
- Other unethical conduct.

This policy should **not** be used for complaints relating to your personal circumstances, such as the way you have been treated at work or as a Member of the Union. In those cases, please use the alternative employee Grievance Procedure or [Member Complaints Procedure](#). If you are unsure whether something is within the scope of this policy, please seek advice from the SU HR team.

5. Reporting

The Union recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to the Union and/or to those for whom the Union are providing a service.

Individuals are advised to follow the procedure listed in [Section 9](#) of this policy to report their concern.

In most cases you should not find it necessary to alert anyone externally but the law recognises that in some circumstances it may be appropriate to report concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, [Protect](#), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concerns to.

We understand that you may be worried about possible repercussions of reporting a concern. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. You will not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, please inform SU HR immediately.

6. Confidentiality

This procedure encourages you to put your name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Anonymous allegations will be considered at the discretion of the CEO and in doing so they will consider:

- The seriousness of the issue raised;
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant.

All allegations will be treated in confidence, and every effort will be made not to reveal your identity unless we have gained your express consent. However, if the matter is subsequently dealt with through other procedures such as the Disciplinary Policy then please note that protecting your identity may not always be possible. Similarly, if the allegation results in court proceedings, then you may be asked to give evidence in open court if the case is to be successful.

7. Untrue Allegations

No disciplinary or other action will be taken against you if you make an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

8. Monitoring

The Students' Union will maintain a register of whistleblowing concerns. This register will record the following details:

- The first name, last name, and job title (where applicable) of the whistleblower;
- The date and time on which the allegation(s) was received;
- The nature of the allegation(s);
- Details of the individual who received the allegation(s);
- Whether the allegation is to be investigated and, if yes, by whom;
- The outcome of the investigation;
- Any other relevant details.

The Register will be confidential and only available to the CEO and for inspection by request by the Union's Board of Trustees. The CEO will report annually to the Trustees on the operation of this procedure and on the whistleblowing, allegations made during the period covered by the report. The report will be in a form which does not identify whistleblowers.

Review of the Whistleblowing Policy will be undertaken by the Human Resources department (su.hr@lse.ac.uk).

9. Whistleblowing Procedure:

9.1 Raising a Whistleblowing Concern

If you are an employee of the Union, we hope that in many cases you will be able to raise any concerns with your line manager. This can be done in person, or in writing, whichever you prefer. You may be able to agree a way of resolving the concern quickly and effectively. Your line manager may decide to escalate your concerns to the General Secretary or HR.

If you are not an employee of the Union or if you prefer not to raise it with your line manager for any reason, please contact Human Resources or the General Secretary directly by emailing:

- The General Secretary su.generalsecretary@lse.ac.uk or.
- Human Resources su.hr@lse.ac.uk.

A meeting will be arranged as soon as possible to discuss your concerns. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of the disclosure and any subsequent investigation. A written summary will be taken of your concerns and a copy of this will be provided to you after the meeting. We will also aim to provide an indication of how the organisation proposes to deal with the matter.

9.2 Investigation

Once a concern has been raised, we will carry out an initial assessment to determine the scope of any investigation. You may be required to attend additional meetings in order to provide further information. In some cases, we may appoint an investigator or team of investigators including employees or external consultants with relevant experience of investigations or specialist knowledge of the subject matter.

The investigator(s) may make recommendations which enable the Union to minimise the risk of future wrongdoing. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. All information about the investigation should be treated as confidential.

9.3 If you are unhappy with the outcome

We will try to deal with any concern raised fairly and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with Human Resources or the CEO. If after speaking with the CEO, you still feel that it is right to question the matter further, you may consider the following possible contact points:

- Your Trade Union.
- The Citizens Advice Bureau and/or law centre/firm.
- Relevant professional bodies or regulatory organisations

- The Information Commissioner.
- A relevant voluntary organisation.
- The Police.
- The Health and Safety Executive.
- The Local Authority Designated Officer or Safeguarding Children's Board.
- The Office for Students.
- The Charity Commission.
- The Department for Education.
- Her Majesty's Revenues and Customs (HMRC).

Please note that this is not an exhaustive list.

For more information see **Appendix A – Whistleblowing process**

Appendix A – Whistleblowing process

Allegation(s)

Irrespective of whether a written or oral report is made, the relevant information is provided including:

- ✓ The first name, last name, job title (where applicable) of the individual making the allegation;
- ✓ The history/background of the allegation (provide relevant dates/times and job titles of those who may be in a position to have contributed);
- ✓ The specific rationale/reason for the allegation.

Note: the person making the allegation(s), will not be expected to prove the truth of any allegation(s). This information should be provided to the individual the allegation was reported to, in order to establish there is reasonable grounds for the allegation.

Action(s)

On receipt of an allegation, the General Secretary and/or HR will:

- ✓ appoint an appropriate internal or external investigator whose role is to gather as much information (*within 5 working days of receipt of the allegation*) including:
 - The date/time/record of the allegation
 - An acknowledgement of the allegation
 - Consideration of any documentation supplied by the whistleblower

The appointed investigator via HR should ask the whistleblower their preferred method of communication to preserve confidentiality.

If the allegation(s) disclose evidence of any criminal offence it should be reported the Board of Trustees, and a decision will need to be made as to whether to inform the police.

If the issue is around safeguarding, specifically harm to vulnerable adult (LSE Student) this should be immediately referred to the school's safeguarding lead of the department.

Responsibilities

The overall responsibility of appointing an internal and/or external investigator is with General Secretary and/or HR. They will also make sure a record is kept and shared at HR sub-committee and LSESU Board of Trustees.