

 <p>S P Jain London School of Management</p>	<p>Speak Out Policy</p>
<p>Document Type</p>	<p>Policy</p>
<p>Administering Entity</p>	<p>Chief Operating Officer, Heads of Services, all staff</p>
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<p>Last Approval/ Amendment Date</p>	<p>New Policy</p>
<p>Approval Authority</p>	<p>Board of Directors</p>
<p>Indicative Date of Review</p>	<p>July 2028</p>

1) Introduction

- a) We are committed to providing high-quality services provided within the framework of the S P Jain London School of Management’s (the School) mission and values and its commitment to high standards of integrity and performance.
- b) The School welcomes constructive criticism and feedback from staff and students and has formal and informal mechanisms in place to address matters raised. We also recognise that on occasions, these policies and processes may not be appropriate, especially where staff and students suspect there may be malpractice or impropriety occurring at the School.
- c) The Public Interest Disclosure Act protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they ‘blow the whistle’ on malpractice or impropriety. Where a worker finds information which they believe shows malpractice or wrongdoing with an organisation, they can disclose it without fear of reprisal, and this can be done independently of line management. The School’s Speak Out Policy takes these principles and extends them to all staff and students who believe they have discovered malpractice or wrongdoing at the School.

2) Scope

- a) The policy is intended to allow staff and students to raise concerns and disclose information about perceived malpractice. It is not a part of or connected in any way with the School’s complaints or grievance policies and procedures. Malpractice and wrongdoing include, but are not limited to:
 - Financial malpractice, impropriety or fraud;
 - Breaches of financial controls, false accounting/reporting, financial or other irregularities;
 - Academic malpractice;
 - Failure to comply with the School’s legal or regulatory obligations (e.g. equality legislation, consumer protection legislation, safeguarding, data protection or health and safety regulations laws);

- Unethical business conduct (e.g. solicitation of anything of value from third parties that influence the rewarding of contracts);
- Bullying, harassment, discrimination or victimisation of others;
- Criminal activity including assault;
- Staff involved in substance abuse;
- Actions intended to hide any of the above; and
- Behaviour that might damage the School's reputation.

3) Safeguards

- a) The Speak Out policy is designed to offer protection to those who disclose concerns, provided the disclosure is made:
- In good faith; and
 - In the reasonable belief of the individual making the disclosure that it tends to show malpractice.

4) Confidentiality

- a) The identity of the individual making the disclosure will be kept confidential to those dealing with the case only provided it does not hinder or block any investigation or the School's ability to meet legal obligations. However, the investigation process may disclose the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

5) Anonymous Allegations

- a) Concerns expressed anonymously carry less weight, but may be used at the School's discretion, depending on:
- The severity of the issues raised;
 - The credibility of the concern;
 - Supporting evidence received; and
 - The likelihood of confirming the allegation from other credible sources.

6) Untrue allegations

- a) No action will be taken against the discloser if an allegation is made in good faith but is not confirmed by subsequent investigation.
- b) The making of malicious or vexatious allegations is likely to result in disciplinary action.

7) Disclosure to senior management

- a) In the first instance, the disclosure should be made to the line manager, for staff, or to the Programme Leader for students. They will decide if it is appropriate to resolve the matter in School.
- b) If this is not possible as it is the line manager/programme leader who is the subject of the disclosure, the matter should be referred to the Chief Operating Officer or Dean.

- c) Where staff or students are dissatisfied with the outcome, they should raise the matter with the Chief Operating Officer or Dean if they have not already done so or they may refer the matter to the member of the Chair of the Audit and Risk Committee.
- d) Where an allegation is about a senior member of staff, it may be raised directly with the Chair of the Audit and Risk Committee.
- e) The Chief Operating Officer/Dean or Chair of the Audit and Risk Committee will respond to the person raising the matter in a timely manner and will decide the course of action to be taken.

8) Next Steps

- a) The person receiving the initial disclosure will consider the information made available and should decide whether there is a *prima facie* case to answer, whether an investigation should take place, and in what form. Investigations may involve:
 - i) The application of a standard School management procedure;
 - ii) An investigation by external auditors; or
 - iii) An investigation by external HR professionals;
 - iv) Referral to an external body such as the Office for Students or the police, before or after an internal investigation has taken place.
- b) Investigations will not be carried out by any person who will have to make a decision on the matter, or who may be involved in the allegation.

9) Feedback

- a) An outline of any initial action taken and any further action to be taken will be provided to the discloser.
- b) The person(s) against whom the disclosure was made will be informed of it together with any supporting evidence. They will be allowed to respond before any investigation or further action is concluded **unless** doing so may compromise the outcome of an investigation.

10) Reporting of outcomes

- a) A brief report of all disclosures, not identifying individuals, and any subsequent actions taken will be made to the Audit and Risk Committee in order to monitor the effectiveness of this policy and to ensure any organisational learning is achieved.