
WHISTLEBLOWING POLICY

1. Introduction

Hult Ashridge is committing to ensuring that the working environment within the organisation encourages trust, honesty, integrity, and accountability, amongst staff, students, apprentices, and visitors. Under The Public Interest Disclosure Act (1998) legal protection is given to employees against dismissal if they are to raise a concern which is serious and likely to be in the interest of the public.

Employees who are witness to or have serious concerns over malpractice or wrongdoing will always be encouraged to disclose this information, without the fear of reprisal. Within the Human Rights Act 1988 it protects an individual's right to freedom of expression, which includes whistleblowing.

2. Scope

This policy applies to:

- Staff
- Students and apprentices
- Contractors
- Suppliers
- External speakers
- Visitors
- Representatives of organisations in partnership with Ashridge.

Whistleblowing is the act of drawing attention to perceived wrongdoing, misconduct, or unethical activity. Disclosures which would qualify as whistleblowing include:

- Failure to adhere to safeguarding procedures and the Prevent duty
- Unethical behaviour
- Criminal intent or activity
- Risk or actual damage to the environment
- Financial malpractice
- Company breaking the law, for example not having the right cover of insurance
- Failure to comply with health and safety guidelines
- Attempts to conceal any of the above.

Personal grievances such as discrimination, harassment and bullying are complaints which do not count as whistleblowing therefore they are not protected under

whistleblowing law, this is unless the case is in the public interest. These sorts of complaints should be reported following the grievance policy.

3. Protection when making a disclosure

It is important that before making a disclosure the employee ensures that it meets the above criteria, all disclosures made are welcomed as Hult Ashridge strives to ensure that it is constantly improving and strengthening as an organisation.

Those making a disclosure must ensure that they are doing so in good faith, with a reasonable belief that the information they are disclosing is true, and that there is no personal gain for themselves out of making the disclosure.

4. Confidentiality

Hult Ashridge ensures that all disclosures made are treated with confidence, with any investigations carried out discreetly; the identity of the individual who made the disclosure will also not be revealed without their permission.

5. The procedure

For employees, students, apprentices and other groups working at Hult Ashridge they can make a disclosure using a safe and confidential channel which is operated by an external service provided, Syntrio Lighthouse. Syntrio Lighthouse is a global compliance organisation which ensures anonymous, safe, and confidential reporting of misconduct. The hotline can be accessed through 5 different channels:

- Online portal
- Email
- Fax
- Mobile App
- Global “toll-free” telephone access

Upon a disclosure being logged it can be tracked by both the reporter and Hult Ashridge, this helps ensure a channel of concerns outside of line management is present. The person responsible for dealing with such queries at Hult Ashridge (including the allocation of the individual to carry out the investigation) is the Chief Operating Officer (COO). However, if it is not appropriate for the COO to deal with the disclosure it will be handled by the President of Hult International Business School or the Chair of the Ashridge Board.

The process ensures that Hult Ashridge has an appropriate service enabling disclosures to be handled in a confidential and supportive way.

6. Allegations

Hult Ashridge encourages those making a disclosure to identify themselves if they feel comfortable doing so, as this may assist in gathering supporting evidence.

When allegations made in good faith turn out to be untrue, no action will be taken against the individual. Hult Ashridge takes false or untrue allegations made with malicious intent seriously and the appropriate action will be taken against the individual.

7. Timescales

The person responsible for the investigation will acknowledge receipt of the disclosure in a timely manner to the person who has made the disclosure. Hult Ashridge aims to resolve all disclosures as quickly as possible.

8. Investigating procedure

The person responsible for investigating the disclosure will not have had any involvement within the disclosure. They will also need to follow the below steps:

- Record all details in relation to the disclosure
- Inform the individual whom the disclosure is about and inform them of the right to have a fellow colleague or their union rep present within any interviews
- Depending on the nature of the disclosure, the person responsible needs to consider whether any external bodies need to be informed, such as the police
- Following the disclosure and investigation make a judgement on the nature and validity of the disclosure. This judgement must be recorded along with the findings and a copy must be sent to the employee.
- Invoke any necessary disciplinary actions where justified.

9. Outcomes

Hult Ashridge will ensure that all investigations take into consideration that seriousness of the disclosure and that each investigation is carried out with transparency and integrity.

Should an employee not be happy with the outcome of the investigation they have the right to raise the matter in confidence with a more senior member of staff. If the employee is still not satisfied with the outcome, they should consider raising their concern with the appropriate external organisation. The Chief Operating Officer (or appropriate individual) will be informed of the outcome(s).

10. Investigation Storage

All data which is collected during the investigation, as well as supporting documentation will be kept secure and confidential. All data will not be kept for longer than necessary, however the length of time will depend on the type of disclosure and any resulting legal or disciplinary proceedings, as well as possible appeals which may follow.

11. Monitoring and Review

This policy is reviewed annually and discussed with the Senior Leadership Team to ensure that it continues to meet all the necessary requirements of the organisation.

Review History

Date	Notes
February 2022	Drafting of current status and general updates
March 2022	Review and approval by SLT