



Whistleblowing at LSHTM

Your concerns matter

London School of Hygiene & Tropical Medicine (LSHTM) is committed to promoting an open environment where our community feel comfortable raising concerns about relevant laws and regulations, and/or if they consider something is unethical or potentially harmful.

What is Whistleblowing?

Whistleblowing is the term for the confidential disclosure by an individual of a concern encountered in the workplace relating to a potential wrongdoing. Examples of such wrongdoings include but are not limited to:

- general malpractice such as immoral, illegal or unethical conduct;
- gross misconduct;
- a criminal offence that has been, is being, or is likely to be committed;
- a person who has breached, is breaching, or is likely to breach any legal obligation to which they are subject to (i.e. negligence, or breach of contract);
- potential infractions of relevant regulatory requirements;
- a miscarriage of justice which has occurred, is occurring, or is likely to occur;
- a danger to the health and safety of an individual;
- inappropriate conduct has been, is being, or is likely to be deliberately concealed;
- discrimination of any kind which involves LSHTM or any employees, students; and/or
- any other wrongdoing which will, or may, affect LSHTM's activities or LSHTM's reputation.

This policy is NOT intended to cover complaints for which LSHTM has existing procedures, such as the [Dignity and Respect: Anti-Bullying and Harassment Policy](#), [Grievance Policy](#), [Disciplinary Policy](#) or [student complaints procedure](#), [procedures for inquiring into allegations of research misconduct](#) and cannot be used to reconsider any matters which have already been the subject of any of the aforementioned procedures. In addition, the procedure is not intended to query strategic, academic or financial decisions taken by LSHTM; nor may it be used to reconsider any matters that have already been the subject of a formal harassment/bullying at work, grievance or disciplinary procedure.

How do I raise a whistleblowing concern?



LSHTM's confidential whistleblowing service is provided by our internal auditors, PwC. Individuals may submit whistleblowing concerns to Justin Martin (justin.f.martin@pwc.com)

What will happen to your report?

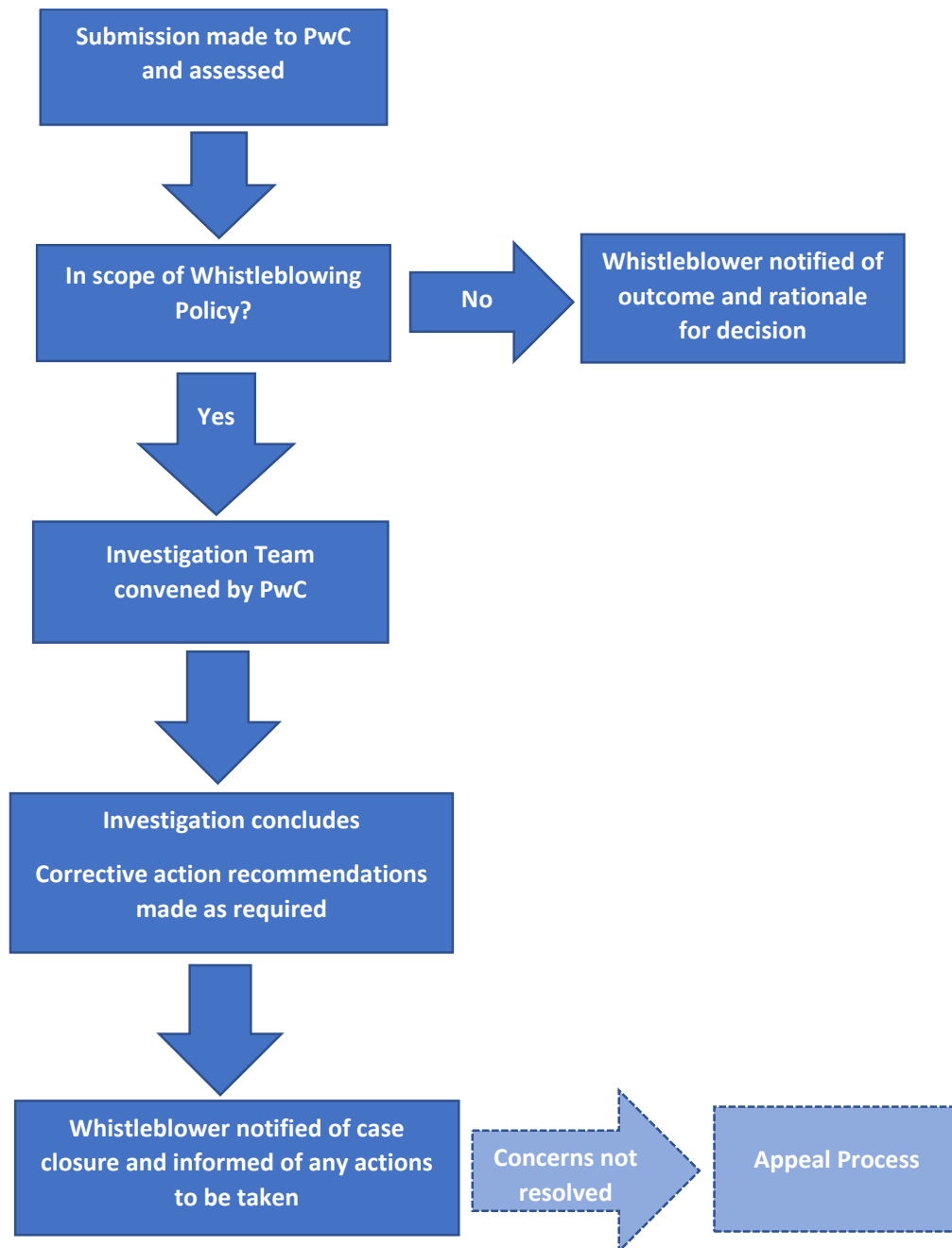
All submissions will initially be assessed by PwC and some additional information might be requested at that time. If the concern raised is not determined to be within scope of the Whistleblowing Policy, PwC will notify the whistleblower of this outcome and the rationale behind their decision.

If the concern is assessed to be within scope, PwC will convene an investigation team. The investigation team will report directly to the Hitesh Patel, Chair of the Audit & Risk Committee. Depending on the complexity of the case or the nature of the concern, internal or external legal counsel and technical expertise might be required. All efforts will be made to conduct the investigation in a timely manner and the whistleblower will be updated regularly on its progress.

On conclusion of the investigation the investigation team will decide whether corrective actions are required and make recommendations on actions to be implemented. The whistleblower will receive confirmation that the case has been closed and will be informed of the actions taken where appropriate.

If the investigation does not resolve the reporter's concern, the whistleblower can lodge an appeal in writing to the Chair of the Audit & Risk Committee.

The nominated appeal officer (appointed by the Chair of the Audit & Risk Committee) will write to the whistleblower inviting them to an appeal hearing to discuss the matter, confirming the right to be accompanied. At the appeal hearing, the decisions taken during the investigation will be considered against the basis for the appeal. The appeal officer will notify the whistleblower in writing of the outcome with reasons, normally within ten days of the appeal hearing. This decision will be final and there will be no further right of appeal.



What protection and support is available to me?

Whistleblowers may be - understandably - worried about potential repercussions. The investigative team will always endeavour to keep the identity of the whistleblower confidential and ensure that it remains so after the investigation is concluded unless disclosure is required by law or the regulators.



Whistleblowers should 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, you should inform the internal auditors immediately.

LSHTM's Employee Assistance Programme and confidential helpline (0800 028 0199) is available to all LSHTM staff regardless of role or location and gives access to an independent and confidential support and services.

Who is responsible for Whistleblowing?

Audit & Risk Committee is commissioned by the LSHTM's Governing Body (Council), for overall accountability for ensuring the effective implementation of this policy. PwC is designated by ARC to consider disclosures and allegations.

Approved by Council on 08 February 2022.

To be reviewed for minor edits annually, and full policy review by no later than 08 February 2023.