



## Whistleblowing Policy for students and Fellows

### 1 Context

- 1.1 Wolfson College is committed to the highest standards of integrity in all its activities and maintains procedures for complaints, grievances, harassment, discipline, and academic matters. The College also recognises the importance of providing separately a clear mechanism by which students and Fellows may raise concerns about serious wrongdoing or malpractice in the public interest, and encourages students and Fellows to raise genuine concerns about malpractice or impropriety at the earliest possible stage. This policy describes how such concerns will be addressed, when raised by students or Fellows of the College.
- 1.2 The Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, provide employees with legal protection against being dismissed as a result of disclosing certain serious concerns. It also requires employees who wish to disclose such concerns, and who wish to retain the protection offered by the Act, to follow the relevant internal procedure provided by their employer in all but the most exceptional circumstances. Although the terms of the Act offer protection specifically to employees, the following procedure and associated guidance have been designed to assist students and Fellows who wish to make disclosures, and to secure their proper investigation.

### 2 Scope and qualifying disclosures

- 2.1 This policy applies to all student members and Fellows of Wolfson College in the University of Oxford, including Governing Body Fellows. This policy does not apply to College Staff, who should follow instead the whistleblowing procedure in the College's Employee Handbook.
- 2.2 A qualifying disclosure is a disclosure of information which the individual genuinely and reasonably believes is in the public interest and shows one or more of the following in the past, present, or likely future:
- a. criminal activity, including fraud or corruption;
  - b. failure to comply with legal obligations;
  - c. danger to health or safety;
  - d. environmental damage;
  - e. academic or professional malpractice;
  - f. miscarriage of justice;
  - g. breach of College or University statutes or regulations;
  - h. concealment of any of the above.
- 2.3 This policy is not intended to be used as a mechanism:
- a. to question financial or business decisions taken by the College;
  - b. to reconsider any matters which have already been addressed under grievance or disciplinary procedures;
  - c. to investigate an individual or collective personnel dispute for which there are established routes of complaint and remedies; or
  - d. to investigate an academic dispute between a student and the College.

### **3 Protection**

- 3.1 No student or Fellow will suffer detriment for raising a concern in good faith and with reasonable belief in its substantial truth and public interest. Individuals are encouraged to bring to the College's attention any form of illegality, injustice or breach of health and safety, including matters referred to in 2.2 above, which has occurred or is likely to occur.

### **4 Confidentiality**

- 4.1 Disclosures will be treated as confidential so far as is reasonably practicable.

### **5 Malicious allegations**

- 5.1 Malicious or vexatious allegations may result in disciplinary action.

### **6 Anonymous allegations**

- 6.1 Anonymous disclosures will not normally be investigated.

### **7 Procedure**

- 7.1 Any student or Fellow wishing to make a disclosure should do so to the President, usually by email to [presidents.office@wolfson.ox.ac.uk](mailto:presidents.office@wolfson.ox.ac.uk). In the event a disclosure relates to the President, it should instead be made to the Vicegerent, usually by email to [vicegerent@wolfson.ox.ac.uk](mailto:vicegerent@wolfson.ox.ac.uk).
- 7.2 Any disclosure should be supported by the provision of as much evidence as possible about the grounds on which the disclosure is being made, and about the grounds for believing that malpractice has occurred.
- 7.3 The President or Vicegerent shall, in consultation with relevant College Officers as necessary, determine whether the concern should be addressed under other existing college procedures, for example in relation to complaints, harassment, grievance, or discipline, or whether further investigation is required. If it is determined that the concern should be addressed under another procedure, the matter will be taken forward under that procedure and will no longer fall within the scope of this policy.

### **8 Investigation**

- 8.1 If the President or Vicegerent is of the mind that further investigation is necessary, they shall directly, or by delegation to an appropriate member of the College or its Staff, ensure a prompt and fair investigative process takes place. It shall be for the President or Vicegerent to ensure any individual leading an investigative process has, or is able to acquire, the necessary expertise and training to deal fully and properly with the subject matter of the disclosure. The President or Vicegerent shall determine whether additional expertise, such as external advice, should be sought as part of an investigation, and shall ensure that where a concern relates to integrity in the conduct of research, any investigation is carried out under the provisions of relevant University of Oxford procedures.
- 8.2 The President or Vicegerent, as appropriate, shall inform the person making the disclosure, and at an appropriate stage the subject of the disclosure, of the nature of the investigation to be undertaken and the likely timescale. Where a disclosure is made with reference to an individual or individuals, the person or persons against whom the disclosure is made shall normally be allowed to comment before any investigation is concluded under this procedure.

- 8.3 Where the President or Vicegerent believes the investigation reveals prima facie evidence of misconduct, the matter shall be referred to the appropriate disciplinary process for action under the terms of the College's Statutes and Regulations, or the Employee Handbook.
- 8.4 In all cases, concerns shall be investigated as speedily as is consistent with thoroughness and fairness. The President or Vicegerent shall, preserving confidentiality as may be required by law, ensure any issues of general importance are brought to the attention of Governing Body.

## **9 Outcomes and feedback**

- 9.1 The action(s) taken, including the outcome of any investigation, shall be reported in broad terms to the person making the disclosure, preserving confidentiality as may be required by law. In the event no action is taken, the report shall include an explanation for this.
- 9.1 In the event no action is taken, the individual shall be allowed the opportunity to remake the disclosure to the Secretary to Governing Body, usually by email to [gb.secretary@wolfson.ox.ac.uk](mailto:gb.secretary@wolfson.ox.ac.uk). The Secretary to Governing Body shall only consider disclosures which have first been considered by the President or Vicegerent, as appropriate.
- 9.2 In the event that a disclosure is made to the Secretary to Governing Body, they shall consider all the information presented, the procedures that were followed, and the reasons for not taking any further action. The outcome of this will either be to confirm that no further action is required, or that further action is required, in which case the procedures above shall be followed save for any adjustments necessary to ensure a fair process at the review stage.

Michaelmas term 2025  
College Secretary