



Whistleblowing Policy (Students)

London Campus

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1. INTRODUCTION

The School is committed to promoting the highest standards of quality, integrity, openness and accountability in its students and staff. To achieve this, the School will ensure that it has the appropriate policies and procedures to enable concerns to be raised regarding malpractice, corruption, wrongdoing and any form of impropriety.

The purpose of this policy is to provide a means by which students are enabled to raise concerns with the appropriate School authorities if they have reasonable grounds for believing that there is serious malpractice within the institution. The School supports its students who make a disclosure in good faith and without malice, and not for trivial or vexatious reasons allowing them to do so in a confidential basis without fear of reprisal or victimisation. All reasonable steps will be taken to protect whistleblowers from bullying, harassment or reprisals.

The policy is not designed to permit or encourage the questioning of legitimate financial or business decisions adequately taken by the School. Similarly, it may not be used to bring about the consideration (or reconsideration) of any matters of private interest to the individual concerned, which may be properly and appropriately addressed under other School's procedures e.g. code of conduct and disciplinary procedure, complaints procedures etc.

2. TYPES OF MALPRACTICE

All students at the School are encouraged to raise their concerns about any of these issues:

- failure to comply with legal obligations or regulations of the School
- financial or non-financial maladministration or malpractice or impropriety or fraud
- academic or professional malpractice
- a risk to the health or safety of any individual
- environmental damage
- a miscarriage of justice
- improper conduct or unethical behaviour
- criminal offence
- attempts to suppress or conceal any information relating to any of the above.

The above should not be viewed as an exhaustive list. All concerns raised will be treated fairly and properly. It is ultimately the responsibility of the School to decide if an investigation should be conducted and for determining the nature of any actions which may follow as a result.

3. CONFIDENTIALITY

In view of the protection afforded to a student raising a bona fide concern, it is preferable that they put their name to any disclosure. If a student wishes to raise a concern but remain anonymous, information will not be disclosed without the student's consent. It should be recognised that the investigation process may, of necessity, reveal the source of information, and, as part of the investigation, the student making a disclosure may need to provide a statement.

Anonymous complaints are not covered by this procedure but may be reported, investigated or acted upon as the person receiving the complaint sees fit (including the use of this procedure), having regard to the seriousness of the issue raised, the credibility of the



complaint, the prospects of being able to investigate the matter, and fairness to any individual mentioned in the complaint.

4. PROCEDURE FOR MAKING A DISCLOSURE

We encourage students to raise any of the concerns listed above with either their Academic Directors or the relevant programme administration team.

Where this is not possible, they should report their concern to the UK Director of Student and Academic Services at fmele@escp.eu, making it clear that they are raising their concern within the School's Whistleblowing Policy. The School will normally acknowledge receipt of the concern raised within five working days of receiving it.

Depending on the nature of the concern, it will be reviewed, and where appropriate, an investigation process will be started. Where possible, feedback will be provided to the student regarding the concern they have raised.

5. INVESTIGATION

If the disclosure provides a prima facie indication of malpractice, the Designated Person(s) considering the case will decide on the form of investigation to be undertaken. This will depend on the nature of the matter raised and may lead to:

- investigating the matter internally;
- referring the matter to the External Auditors;
- referring the matter directly for external investigation by an appropriate body such as the police, the Health and Safety Executive, the Environment Agency, or the Serious Fraud Office

If the designated person decides not to proceed with an investigation, the decision will be explained as fully as possible to the individual who raised the concern.

Where disclosure is against an individual, they will be informed about it at an early stage along with the supporting evidence and will be allowed to respond. The individual making the disclosure will be informed of what action is to be taken.

6. SUPPORT

It is understandable that whistleblowers may be worried about possible repercussions after raising a concern. The law protects whistleblowers who report genuine concerns. The School encourages openness and will support whistleblowers if they raise a genuine concern under this policy, even if it turns out to be mistaken.

Students should be aware that if their allegations are malicious or motivated by personal gain, the School may consider taking disciplinary action against them.

In recognition that raising a concern can be a difficult experience for students, the School will provide additional Pastoral support and counselling.



Support is also available externally through an independent whistleblowing charity, Protect. They operate a confidential helpline which provides free, independent and confidential advice and the UK helpline is 020 3117 2520.