

- 5.4. If a member of staff or an associate is found to have raised a concern maliciously or vexatiously, they will lose the protection of the Whistleblowing Policy and may be subject to disciplinary action under () (" @HR-005) or their policy.
- 5.5. All concerns will be treated in confidence and every effort will be made not to reveal in so far as this is consistent with the proper examination and investigation of the matter. No one should seek to identify those involved where their identity has not been disclosed as part of proper examination and investigation. If it is necessary to reveal the identity as part of proper examination and investigation, this will be discussed with them at the earliest possible stage of the process.
- 6.1. The Whistleblowing Policy and procedure complement but do not replace existing procedures; staff should use the procedures in this section when the others are not appropriate.
- 6.2. The Institute (" @HR-004) exists for staff to raise personal employment-related grievances. Further information on the difference between Whistleblowing and grievances are outlined in section 7. In addition, the Institute (# (BI-HR-001

Examples of the difference between a grievance and a protected disclosure

- They have previously raised their concern

- Maintaining a whistleblowing register. This will include all monitoring and handling of reports.

The Investigating Officer is appointed by HR. They should:

- Fairly and objectively carry out a full investigation.
- When the investigation is concluded, send the findings to HR.

- The Fraud and Bribery Policy (BI-COR-007) is supplementary to this response plan for cases of actual or suspected fraud or bribery.
- ~~1. In the event of a staff member's resignation or departure from the Institute, alternative staff will be appointed by the COO, Chair of the Audit Committee or Head of HR.~~
this response plan, alternative staff will be appointed by the COO, Chair of the Audit Committee or Head of HR.
- Flowcharts for the whistleblowing and appeals procedures are at the end of this appendix.
- Under the Whistleblowing Policy, individuals are encouraged to report concerns to their line manager, Institute contact or a senior manager.
- If individuals are reluctant to discuss concerns with these persons, they may approach:
 - The Institute Director;
 - The Chief Operating Officer (COO);
 - The Head of Finance;
 - The Head of HR;
 - Or via email to: whistleblowing@babraham.ac.uk. Emails sent to this account are sent directly to the Chair of the Institute Audit Committee and the COO.
- The person receiving the concern should ensure that full details of the concerns are recorded and HR or the COO, as appropriate, notified as soon as possible.
- The COO will determine if and when to notify the Institute Director, Audit Committee and the Board of Trustees if they have not already been informed.
- The person receiving the concern will, normally within five working days of receipt of a concern, provide the individual with the following:
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policies may need to be considered (e.g., Fraud & Bribery Policy [BI-COR-007], Research Misconduct Policy [BI-RES-004], Safeguarding Policy [BI-HAS-003], Disciplinary Policy [BI-HR-005] etc.) and the format of the investigation.

- In most cases, the investigation will be carried out by a senior manager at the Institute (Investigating Officer). If the concerns involve, or may involve, a specific staff member or associate, the investigation will be dealt with by an Investigating Officer who is at least one pay band higher than the Respondent. There

- If at any stage of the investigation the Investigating Officer feels that the police should be involved, the Investigating Officer will contact the Head of HR and the COO. Any decision to notify the police will be made following discussion between COO, Head of HR and relevant Heads of Department, and with the agreement of the Institute Director. In particular, consideration will be given as to whether civil or criminal proceedings should be undertaken in order to protect the Institute

