

# DISCLOSURE (WHISTLEBLOWER) POLICY

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## KALASALINGAM ACADEMY OF RESEARCH AND EDUCATION

(Deemed to be University)

(Under the section 3 of UGC act 1956)

Anand Nagar, Krishnankoil-626126, Srivilliputtur (Via), Tamil Nadu, India.

Phone: 04563-289042, Fax: 04563-289322

[www.kalasalingam.ac.in](http://www.kalasalingam.ac.in) email: [info@kalasalingam.ac.in](mailto:info@kalasalingam.ac.in)



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## DISCLOSURE(WHISTLEBLOWER) POLICY

### Policy Preparation & Verification Team

Prepared: 2024

|                |                     |                                                                                      |
|----------------|---------------------|--------------------------------------------------------------------------------------|
| Prepared by    | Dr. R. Kottaimalai  |    |
| Reviewed by    | Dr. C. Sivapragasam |  |
| Recommended by | Dr. P. Deepalakshmi |  |
| Approved by    | Vice-Chancellor     |  |



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## DISCLOSURE (WHISTLEBLOWER) POLICY

### 1. PURPOSE

The purpose of this Disclosure Policy is to provide a secure and transparent mechanism for members of **Kalasalingam Academy of Research and Education** to report concerns regarding misconduct, unethical practices, fraud, corruption, or violations of institutional policies.

This policy ensures that individuals can raise concerns **without fear of retaliation**, while enabling the institution to investigate and address issues in a timely and fair manner.

### 2. DEFINITIONS

- **Disclosure (Protected Disclosure):**  
A report made in good faith by an individual regarding suspected wrongdoing within the institution.
- **Whistleblower:**  
Any individual who makes a protected disclosure under this policy.
- **Wrongdoing:**  
Includes fraud, corruption, misuse of funds, academic misconduct, legal violations, data breaches, or abuse of authority.
- **Penalisation (Retaliation):**  
Any adverse action taken against a whistleblower for making a disclosure (e.g., demotion, harassment, discrimination).
- **Designated Authority:**  
The official or committee responsible for receiving and handling disclosures (e.g., Vigilance Officer / Ethics Committee).
- **Good Faith:**  
A disclosure made honestly, with reasonable belief that the information provided is true and relates to actual or suspected wrongdoing, regardless of whether the allegation is ultimately substantiated. A disclosure shall not be considered to be made in good faith if it is knowingly false, malicious, frivolous, or made solely to cause harm to another person.

### **3. AIMS AND OBJECTIVES OF THIS POLICY**

- To encourage individuals to report genuine concerns
- To provide a confidential and secure reporting mechanism
- To ensure fair and impartial investigation of disclosures
- To protect whistleblowers from retaliation
- To promote transparency, accountability, and ethical conduct
- To strengthen institutional governance and compliance

### **4. POLICY SCOPE**

This policy applies to:

- Faculty, staff, and administrative personnel
- Students and research scholars
- Contractors, vendors, and third-party service providers
- Any individual associated with the institution

The policy covers disclosures related to:

- Financial fraud or corruption
- Academic misconduct (plagiarism, falsification)
- Data breaches or cybersecurity violations
- Abuse of authority or unethical conduct
- Violations of laws, regulations, or institutional policies

### **5. ROLES AND RESPONSIBILITIES**

#### **5.1 Management**

- Ensure implementation of this policy
- Promote a culture of openness and accountability

#### **5.2 Designated Authority / Ethics Committee**

- Receive and review disclosures
- Ensure confidentiality and fairness
- Initiate and oversee investigations
- Ensure that any member involved in reviewing or investigating a disclosure declares any actual, potential, or perceived Conflict of Interest (COI). Any individual with such a conflict shall recuse themselves from the investigation, and an alternate member shall be nominated to ensure impartiality.

### **5.3 Employees and Students**

- Report concerns in good faith
- Provide accurate and relevant information

### **5.4 Internal Audit / Vigilance Unit**

- Conduct investigations where required
- Maintain records and recommend corrective actions

## **6. MAKING A DISCLOSURE**

A disclosure may be made through the following channels:

- Official email designated for whistleblowing
- Online reporting portal
- Written complaint submitted to the Designated Authority
- Anonymous reporting mechanism

### **Guidelines for Disclosure:**

- Must be made in good faith
- Should include relevant details such as:
  - Nature of concern
  - Individuals involved
  - Supporting evidence (if available)
- False or malicious allegations may lead to disciplinary action

### **Reporting Timeline**

Disclosures should preferably be made as soon as reasonably practicable and, wherever possible, within seven (7) working days of becoming aware of the suspected wrongdoing. Delayed reporting shall not invalidate a disclosure where reasonable justification exists.

## **7. REPORTING AND OTHER MATTERS**

### **7.1 Confidentiality**

- All disclosures and related records shall be handled confidentially and accessed only by authorized personnel involved in the assessment or investigation.
- The identity of the whistleblower shall be protected to the maximum extent possible, subject to applicable legal requirements, principles of natural justice, and procedural requirements necessary for a fair investigation or judicial proceedings.

## **7.2 Protection Against Penalisation**

- No whistleblower shall face retaliation for reporting in good faith
- Any act of retaliation will be treated as a serious violation

## **7.3 Investigation Process**

- The Designated Authority shall acknowledge receipt of the disclosure within three (3) working days, wherever the identity and contact details of the whistleblower are available.
- A preliminary assessment shall ordinarily be completed within ten (10) working days to determine whether a formal investigation is warranted.
- Where a formal investigation is initiated, it should ordinarily be completed within twenty (20) working days unless the complexity of the matter requires an extension, which shall be documented with reasons.
- The investigation findings and recommendations shall normally be submitted to the Competent Authority within seven (7) working days after completion of the investigation.
- Documentation of findings and recommendations shall be maintained securely.

## **7.4 Outcome and Action**

- Appropriate disciplinary or legal action will be taken
- Corrective measures will be implemented

## **7.5 Complaints Against the Designated Authority**

Where a disclosure relates to or involves the Designated Authority, Vigilance Officer, Ethics Committee Chairperson, or any individual responsible for receiving disclosures under this Policy, the complaint shall be submitted directly to the Vice-Chancellor. Where the complaint involves the Vice-Chancellor, it shall be referred to the Executive Council/Board of Management or any authority designated under the University's Statutes for independent consideration.

## **7.6 Anonymous Disclosures**

Anonymous disclosures may be accepted and considered for preliminary assessment. However, formal investigation shall ordinarily be initiated only where the disclosure contains sufficient credible information or supporting evidence to enable meaningful verification. Anonymous complaints that are vague, frivolous, or unsupported may be closed after recording the reasons.

## **8. REVIEW AND APPROVAL**

- This policy shall be reviewed periodically by the institution's administration
- Updates will be made to reflect regulatory, legal, or institutional changes

- Final approval of this Policy and oversight of its implementation shall rest with the Vice-Chancellor or such authority as may be authorized under the University's Statutes, Ordinances, or Regulations.

## **9. FURTHER INFORMATION**

For additional guidance or clarification, members may contact:

- Vigilance Officer / Ethics Committee
- Internal Audit Department
- Administrative Office

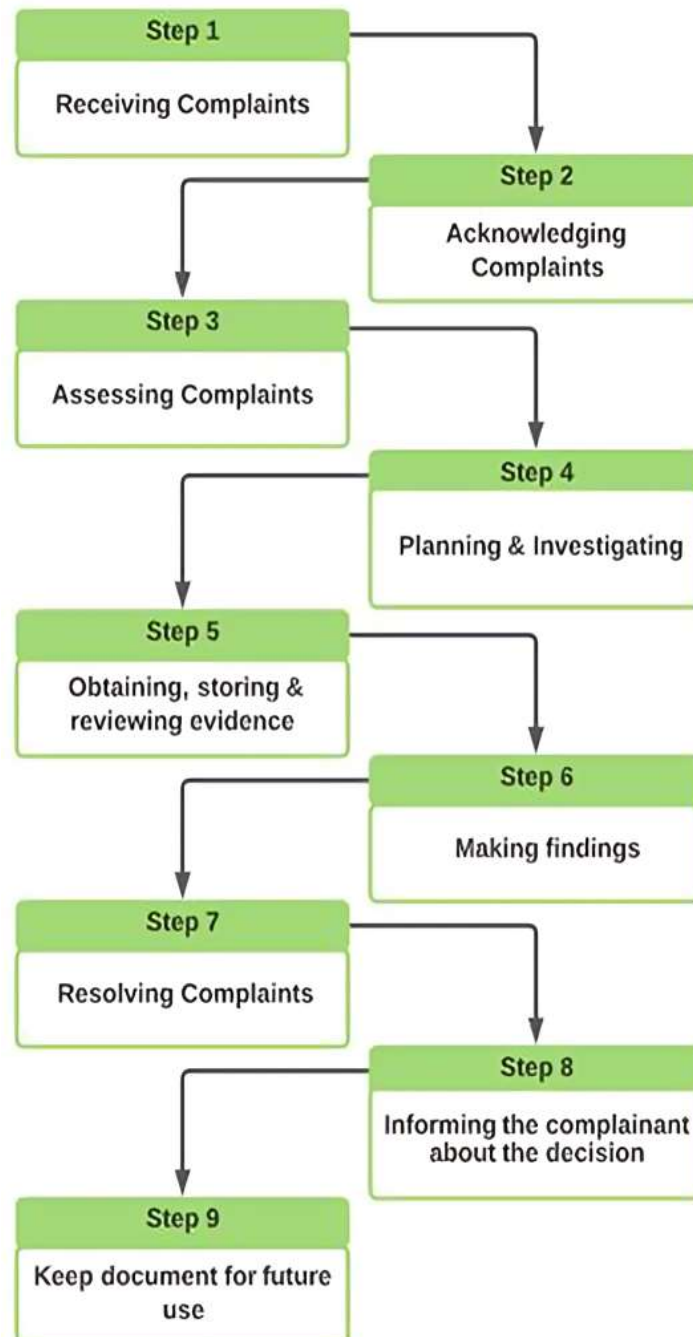
## **10. SUPPORTING POLICIES, PROCEDURES AND FUNCTIONS**

This policy should be read in conjunction with:

- Anti-Fraud Policy
- Data Protection Policy
- Cybersecurity Policy
- Code of Conduct and Ethics Policy
- Grievance Redressal Policy
- IT Usage Policy
- Conflict of Interest Policy

## APPENDIX 1: PROTECTED DISCLOSURE PROCESS FLOWCHART





## APPENDIX 2: PROTECTED DISCLOSURES REPORTING FORM

### DISCLOSURE (WHISTLEBLOWER) REPORTING FORM

#### 1. Whistleblower Details (Optional)

*(You may choose to remain anonymous)*

- Name: \_\_\_\_\_
- Employee ID / Register Number (if applicable): \_\_\_\_\_
- Department / Program: \_\_\_\_\_
- Contact Number: \_\_\_\_\_
- Email Address: \_\_\_\_\_

#### 2. Report Details

- Date of Report: \_\_\_\_ / \_\_\_\_ / \_\_\_\_
- Type of Disclosure (✓ Tick as applicable):
  - ☐ Financial Fraud
  - ☐ Academic Misconduct
  - ☐ Data Breach / IT Misuse
  - ☐ Abuse of Authority
  - ☐ Corruption / Bribery
  - ☐ Other (please specify): \_\_\_\_\_

#### 3. Description of Concern

*(Provide detailed information about the incident. Include dates, locations, and sequence of events.)*

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#### 4. Individuals Involved

*(List names, designations, or any identifying details of individuals involved, if known.)*

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## 5. Evidence / Supporting Documents

*(Attach or describe any supporting documents, emails, screenshots, or other evidence.)*

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## 6. Have you reported this matter previously?

☐ Yes      ☐ No

If yes, provide details:

## 7. Preferred Mode of Communication

☐ Email      ☐ Phone      ☐ In-person      ☐ No follow-up required

## 8. Declaration

I hereby declare that the information provided in this report is **true and accurate to the best of my knowledge**. I understand that making a false or malicious allegation may result in disciplinary action.

- Signature (if not anonymous): \_\_\_\_\_
- Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

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## For Office Use Only

- Reference Number: \_\_\_\_\_
- Date Received: \_\_\_\_ / \_\_\_\_ / \_\_\_\_
- Received By: \_\_\_\_\_
- Initial Assessment Status: ☐ Accepted ☐ Rejected ☐ Pending
- Remarks: \_\_\_\_\_

### **APPENDIX 3: EXAMPLES OF PENALISATION**

Penalisation may include:

- Suspension, demotion, or termination
- Harassment or intimidation
- Denial of academic or professional opportunities
- Discrimination or unfair treatment
- Threats or coercion

Any such actions will be treated as serious misconduct.