

## Public Interest Disclosure (Whistleblowing) Procedure

### This procedure sits under the Public Interest Disclosure (Whistleblowing) Policy

<b>Brief Description &amp; Purpose:</b>	This procedure sets out the steps to be taken when a qualifying disclosure is made under the Public Interest Disclosure (Whistleblowing) Policy.		
<b>Applicable to (list cohorts):</b>	<b>Staff:</b> All staff	<b>Students:</b> All Students	<b>Third Parties:</b> All who are in a formal relationship with the University
<b>Effective From:</b>	7 April 2026	<b>Last reviewed date:</b>	February 2026
<b>Approval Authority:</b>	Audit Committee	<b>Approved:</b>	7 April 2026
<b>Executive Owner:</b>	Georgina Bailes, Secretary to the Board and Director of Governance	<b>Next review date:</b>	February 2029
<b>Business Owner:</b>	Beth Lenney, Governance Manager	<b>Publication External Y/N</b>	Y
<b>Contact for queries:</b>	Beth Lenney		

## 1. Introduction

1.1 This procedure sets out the steps to be taken when a qualifying disclosure (one which does not cover the subjects noted in section 2.5.3 of the Policy or similar) is made under the [Public Interests Disclosure Policy](#).

## 2. Procedure Detail

### 2.1 Reporting and Investigation Procedures

2.1.1 A number of key steps will be followed in the event of a qualifying disclosure:

#### 2.1.2 Step 1

A person who believes that they have discovered evidence of wrongdoing within the University can make a disclosure in writing to the Secretary to the Board and Director of Governance as the 'Designated Person' under this Policy and Procedure. If the Secretary to the Board and Director of Governance is not available to conduct the preliminary assessment, it will be assigned to the General Counsel. The Designated Person will inform the Vice-Chancellor of the disclosure at this point.

If the Vice-Chancellor is the subject of the disclosure, the Designated Person will inform the Chair of the Board.

If the Secretary to the Board and Director of Governance is the subject of, or involved in the content of, the disclosure, the disclosure should be made directly to the Vice-Chancellor.,

#### 2.1.3 Step 2

Within five working days, the Designated Person or their nominee will undertake an assessment of the disclosure, which may include appropriate consultation and clarification of specific points with the Discloser. The Designated Person will determine whether:

- an investigation should be undertaken into the matter; or
- the matter should be closed, providing a clear basis for making this judgment, which will be communicated to the Discloser in writing by the Designated Person.

If the disclosure relates to the Vice-Chancellor or a Governor, the Chair of the Board will be involved in this decision and any further steps required or if the disclosure relates to the Chair of the Board, the Senior Independent Governor will be involved.

#### 2.1.4 Step 3

If the Designated Person confirms that an investigation is required, the Vice-Chancellor, the Chair of the Board of Governors, and the Chair of the Audit Committee will be notified and a further decision will be made by the Designated Person at this stage to:

- investigate the matter internally; or
- refer the matter directly to the police or other external body as appropriate.

Where the matter is the subject of an internal investigation, the Designated Person will appoint an 'Investigating Officer' to undertake the investigation on behalf of the University. This will normally be the General Counsel supported by the Risk Manager. If the Secretary to the Board and Director of Governance, who line manages the Risk Manager, is the subject of the disclosure, the General Counsel will be supported by Legal Services. If the General Counsel is the subject of the disclosure, the Investigating Officer will be an appropriate senior leader.

If the investigation indicates that there may be significant internal control weaknesses, such as a material breach of the Financial Regulations, the Investigating Officer will involve the University's internal audit provider in the investigation.

It is important that the investigation is conducted in a robust, thorough, and fair manner. Investigations should normally be completed and reported to the Designated Person, within 15 working days, though if matter under investigation is of significant scale or complexity and may require additional time, the Investigating Officer will notify the Designated Person as soon as possible.

As the nature of the investigation will be determined by the disclosure, detailed steps are not included in this procedure. The evidence gathered and the conclusions drawn must, however, be sufficiently robust to withstand both potential legal scrutiny and exposure to the public domain.

#### 2.1.5 Step 4

The Investigating Officer will report the findings to the Designated Person, who will determine whether there is adequate evidence to merit further action, and if so, what further action is required. Action required may include:

- appropriate management action to correct the error, including revisions to procedures or other controls;
- further action under the University's disciplinary procedures;
- and/or Referral to an external body such as OfS or the police.

#### 2.2 Other Considerations

2.2.1 The Designated Person will inform the Discloser in writing of the outcome of the investigation and what action, if any, is to be taken. Where no action is to be taken, the Discloser will be informed of the reasons.

2.2.2 The Discloser has the right to make a wider disclosure outside the University and raise their concern with an external body. In the case of the regulation of the University, OfS has its own [arrangements](#) to allow students, staff or members of the public who believe that a university or college is not meeting its conditions of registration to notify the regulator.

2.2.3 If a Discloser wants independent advice at any stage, they may contact the independent national charity [Protect - Speak up stop harm \(protect-advice.org.uk\)](#). Trade union members may also wish to seek advice from their union.

### 2.3 Reporting the Outcomes of the Disclosure

2.3.1 A confidential report of the outcome of the consideration of disclosures will be presented to the Audit Committee by the Designated Person following consultation with the Vice-Chancellor, as part of the Reportable Incidents process. University Executive will be informed of the outcome unless one or more of its members are the subject of the disclosure, in which case the Designated Person will inform individual members of University Executive as appropriate.

2.3.2 A secure, confidential log of all disclosures, including where a decision was taken not to investigate, is maintained by Governance Services, including:

- the date the disclosure was made;
- the file reference number;
- the type of allegation made;
- the potential risks to the University;
- evidence taken into account during the investigation, which should also be stored securely;
- the status of the allegation;
- the reporting route and outcomes.

2.3.3 The Audit Committee may determine actions arising from the report on the disclosure, which may include:

- a request for the University Executive to improve specific procedures and controls where weaknesses have been identified;
- a request for the internal auditor to undertake a relevant audit where wider control weakness or more systemic actions are indicated by the report; and
- referral of the matter to the Board of Governors, where the nature of the disclosure and findings are so significant, severe or novel as to warrant Board attention.

### 3. Appealing an Outcome

3.1 An appeal of any outcome can be made by following the [University's Appeals Procedure](#) (staff log-in in required).

## 4. **Related Procedures, Guidance and Other Resources**

The following relevant policies and procedures are available on the [University Policy Page](#)

- Public Interest Disclosure Policy
- Disclosure and Management of Conflicts of Interests Policy

- Financial Regulations
- Counter Fraud and Bribery Policy
- Reportable Incidents Policy
- General Data Protection Policy
- Prevent Duty

[University Code of Conduct: Working Together at Northumbria University](#)

## 5. Version

Version No.	Reviewer	Date	Changes
1.0	Georgina Bailes, Beth Lenney	February 2026	New procedure created as part of policy format change to separate into policy and procedure documents.