

Public Interest Disclosure (Whistleblowing) Policy

Brief Description & Purpose:	The Nolan Committee on Standards in Public Life recommended that all public bodies should produce and review a code of practice or policy on 'whistleblowing'. This Policy reflects the principles and the detailed process for the making of public interest disclosures (or 'whistleblowing') under the Public Interest Disclosure Act 1998. The University promotes a culture of openness, transparency and accountability at all levels, and this Policy is aimed at supporting individuals by providing accessible information on the principles and process for disclosing malpractice or wrongdoing in the workplace.		
Applicable to (list cohorts):	Staff: All staff	Students: All Students	Third Parties: All who are in a formal relationship with the University
Effective From:	23 September 2013	Last Review Date:	February 2026
Approval Authority:	Audit Committee	Approved:	7 April 2026
Executive Owner:	Georgina Bailes, Secretary to the Board and Director of Governance	Business Owner:	Beth Lenney, Governance Manager
Next review date	April 2029	Publication External Y/N	Y

1. Introduction

1.1 The University is committed to openness, honesty, integrity and accountability and manages its affairs in a responsible manner in line with the [Values and Behaviours](#) of the University, the external requirements of the Office for Students (OfS), the Charity Commission, and other relevant bodies.

1.2. While it is a requirement of the [Code of Conduct](#) that an employee will not disclose confidential information about any aspect of University business, employees have a responsibility under this Policy and the Public Interest Disclosure Act 1998 to raise genuine concerns about possible illegal, unethical or dishonest behaviour at the earliest opportunity and will be protected when doing so.

1.3 This policy should be used to raise concerns that affect the University's interests or the wider public interest. Many areas of concern can be resolved informally through normal management channels, but this policy provides a formal route with protected disclosures when informal resolution is not appropriate or has not been effective.

2. Policy Detail

2.1 The Public Interest Disclosure Act 1998 (the Act), as amended by the Employment Rights Act 2025, provides protection for individuals ('the Discloser') who raise concerns about wrongdoing. A disclosure is protected where the individual making it reasonably believes it is in the public interest and substantially true and is not made for personal gain.

2.2 Where these conditions are met, the Discloser will not face disciplinary action, detriment such as adverse treatment or harassment, or disadvantage as a result of making a disclosure. Any dismissal of the Discloser on the grounds of the disclosure made would be automatically unfair in law.

2.3 Safeguards and Guarantees on Disclosure

2.3.1 Provided that the Discloser [a] reasonably believes that they are making a disclosure in the 'public interest', and [b] complies fully with this Policy:

- the University will protect the identity of the Discloser and the subject/s of a public interest disclosure as far as is practicably possible, provided that it does not hinder an investigation or result in unfairness (or potential unfairness) to any other party who may be affected by the implementation of this procedure. The subject about whom the disclosure has been made will have the right to respond, and to have representation by a trade union representative or work colleague. On rare occasions, the type of information revealed may be such that it enables the identity of the Discloser to be inferred;
- the Discloser will be protected from reprisal or unfair treatment from the employer or other employees specifically in relation to the disclosure. This type of protection includes the careful consideration of 'counter' disclosures that might be used to cancel out or hinder the investigation of a disclosure. Usually, the investigation into one disclosure will be completed before a 'counter' disclosure is considered;
- the Discloser will be updated at key steps of the procedure, where this would not compromise the direction or outcome of the investigation.

2.4 Anonymous Disclosures

2.4.1 While individuals are encouraged to identify themselves when making a disclosure, , anonymous disclosures will be investigated and acted upon where appropriate, though it would be more effective to involve the Discloser in the investigation.

2.5. Use of this Policy

2.5.1 All members of the University community are encouraged to use this Policy to raise genuine concerns about wrongdoing in the University where a complaint raised through existing management channels, in the opinion of the Discloser, is considered insufficient, not suitable or, has not addressed the matter adequately.

2.5.2 The following list is not exhaustive, but identifies areas of concern which may be the subject of a protected disclosure:

- that a criminal offence has been committed, is being, or is likely to be committed, including financial malpractice, financial impropriety, or fraud including bribery, blackmail, money laundering or corruption;
- failure to observe statutory and legal obligations;
- breaches of the University's Policies and Regulations, including the Financial Regulations;
- academic malpractice;
- other forms of professional malpractice including financial and non-financial maladministration;
- endangering health and safety, including exposure to stress;
- damaging the environment;
- abuse of authority for illegal or unethical purposes;
- miscarriage of justice;
- sexual harassment, that has occurred, is occurring, or is likely to occur (in accordance with the Employment Rights Act 2025 amendment to section 43B of the Employment Rights Act 1996, in force from 6 April 2026);
- deliberate concealment of any of the above.

2.5.3 Where an individual has experienced harassment, bullying, or discrimination personally, the concern is best raised through the [University Unacceptable Behaviours Policy](#). However, where there is a reasonable belief that sexual harassment is systemic, affects or may affect others, or the University has failed to take appropriate action to address or prevent it, a disclosure may be made under this Policy as a qualifying disclosure in the public interest. Other concerns that may be better addressed through other University policies and procedures include the following:

- individual employment matters, including breaches of contract, personal grievances, or disciplinary issues;
- bullying, harassment, or discrimination relating to protected characteristics;
- disagreements with the substance of University policies or regulations;
- concerns about standards of service;
- matters relating to academic freedom or freedom of expression;
- complaints about the Students' Union under the Education Act 1994.

2.5.4 Where there is uncertainty about the most appropriate route, the Governance Services team can provide guidance. If a concern raised through another route is not resolved and the individual believes there is an underlying issue of malpractice or wrongdoing, they may then raise the matter under this Policy

2.6 Implementation of the Policy

2.6.1 The Public Interest Disclosure Procedure {LINK} sets out the detailed steps to be taken in reporting and investigating a disclosure.

2.6.2 The Policy does not cover the consequences of a disclosure where an investigation concludes that anything unlawful has occurred that would subject to the relevant legal proceedings.

2.6.3 If an investigation concludes that unethical or dishonest behaviour has taken place, or, if the disclosure was both unfounded and malicious, or, where the Discloser has experienced reprisal or unfair treatment as set out in 2.3.1 above this will be addressed under the University's disciplinary policies.

3. Key Roles and Responsibilities

Role	Responsibility
Secretary to the Board and Director of Governance	Act as the Designated Person as described in the Procedure.
Vice-Chancellor	Act as the Designated Person as described in the Procedure if the Secretary to the Board and Director of Governance is unable to do so.
General Counsel	Undertake the preliminary assessment as described in the Procedure if the Secretary to the Board and Director of Governance is unable to do so. Advise on the robustness of the proposed approach to investigation and its conclusions if required.
Investigating Officer	Appointed to undertake an internal investigation if required, as described in the Procedure. Appointed by, and reports to, the Designated Person.
Governance Services Team	Maintain a log of all disclosures as described in the Procedure.
Audit Committee	Determine actions to be taken following the report of the Investigating Officer/Designated Person as described in the Procedure.

4. Definitions

Public Interest Disclosures (or 'whistleblowing')	Public Interest Disclosures (or 'whistleblowing') have no strict definition in English Law and refer to the right and responsibility of individuals to raise genuine concerns about possible illegal or dishonest behaviour at the earliest opportunity.
Discloser	An individual that raises a concern about wrongdoing under this Policy.
Designated Person	The person that the disclosure is made to, usually the Secretary to the Board and Director of Governance.
Malpractice	Improper, negligent, unethical, or illegal conduct in the performance of professional or official duties, including but not limited to the categories of wrongdoing set out in section 2.5.2 of this Policy.
Protected Disclosure	A qualifying disclosure made in accordance with the provisions of the Employment Rights Act 1996, for example by reporting to the employer or another appropriate person. A worker who makes a protected disclosure has the legal right not to suffer detriment and, if an employee, not to be unfairly dismissed as a result of making the disclosure.
Public Interest	A disclosure is in the public interest where it relates to wrongdoing that affects or has the potential to affect others beyond the individual making the disclosure, such as other employees, students, or the wider public. Whether a disclosure is in the public interest is assessed on the basis of the reasonable belief of the person making the disclosure at the time it is made.
Qualifying Disclosure	A disclosure of information which, in the reasonable belief of the worker making the disclosure, is made in the public interest and tends to show one or more of the categories of wrongdoing set out in section 43B of the Employment Rights Act 1996. These categories include criminal offences, failure to comply with legal obligations, miscarriages of justice, dangers to health and safety, damage to the environment, sexual

	harassment, and the deliberate concealment of any of these matters. A qualifying disclosure becomes a 'protected disclosure' when it is made to an appropriate person (see the Public Interest Disclosure Procedure for details of who to report to)
Whistleblower	The person that makes the disclosure, also referred to as the Discloser

5. Related Policies, Procedures and Other Resources

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

- Public Interest Disclosure Procedure
- 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](#)

6. Version

Version No.	Reviewer	Date	Changes
1.2	Dr Adam Dawkins	23 September 2013	
2	Georgina Bailes, Beth Lenney	February 2026	Policy format change to separate into policy and procedure documents, amendments to wording for clarity, updates to reflect organisational changes and job titles and to in line with the Employment Rights Act 2025