1.	About this policy	2
2.	Purpose of the policy	2
3.	Responsibility for this policy	2
4.	What does this policy cover?	3
5.	Who can raise a concern under this policy?	4
6.	Safeguards	4
7.	How to raise a concern	4
8.	What we will do next	5
9.	Protection for people raising concerns	6
10.	Reporting concerns to an external organisation	6
App	endix A - Whistle Blowing – Step by Step Guide	8
App	endix B - Procedure for Investigations	9

- 1.1 The University is committed to the maintenance of the highest standards. It seeks to conduct its affairs in a responsible manner taking into account the requirements of the funding bodies and general guidance and legislation on standards in public life, particularly in regard to probity, openness and accountability.
- 1.2 This policy and procedure is designed to allow concerns of public interest arising from the business and conduct of University affairs to be raised, investigated and where appropriate, acted upon.
- 1.3 This policy and procedure has been developed following publication of the Public Interest Disclosure Act 1998 (PIDA) which became effective on 2 July 1999.
- 2.1 The purpose of the procedure is to enable all staff and certain other contracted persons, with reasonable evidence or belief about suspected malpractice within the University, to raise their genuine concerns without being subject to any detriment, including victimisation and disciplinary action up to and including dismissal.
- 2.2 Complaints may be made by any member of staff, student, governor or those contracted to provide services to the University. Complaints that are not of a public interest will be dealt with by other procedures of the University.
- 2.3 Concerns about what is happening at the University can usually be dealt with through the normal channels of communication (through line managers or the People Team) and existing University procedures, as part of a commitment to continuous improvement. However, there may be times when members of the University feel that using existing procedures would be inappropriate or could in some way put their own position at risk. In those circumstances, this policy provides an alternative.
- 2.4 The aims of this policy are to:

3.2 The Director of People & Organisational Development is responsible for managing the policy and for keeping a confidential record of all concerns raised and investigations carried out. They are required to deliver a report to the Board on concerns raised, investigations made and outcomes on an annual basis. The report will not contain the names of those involved.

3.3

- University web pages. They will be able to tell you whether your concerns should be dealt with under this policy or under another University procedure or policy.
- 7.2 If your concern relates to the Director of People & Organisational Development, you should write to the University Secretary & Registrar. If it relates to the Director of People & Organisational Development and the University Secretary & Registrar,

The purpose of the procedure is to allow all staff and certain other contracted persons, with reasonable evidence or belief about suspected malpractice within the University, to raise genuine concerns without being subject to any detriment, including victimisation and disciplinary action up to and including dismissal.



- You should raise any concerns with line manager or People Team in the first instance.
- If you do not feel able to do that, you should contact the Director of People & Organisational Development in confidence.
- If your concern relates to the Director of People & Organisational Development, you should write to the University Secretary & Registrar.
- If it relates to the Director of People & Organisational Development and the University Secretary & Registrar, you should raise it with the Vice-Chancellor.
- If it relates to the Vice-Chancellor, you should raise it with the Chair of the Board of Governors.



- The Director of People & Organisational Development will be able to tell you whether your concerns should be dealt with under this policy or under another University procedure or policy.
- If this policy applies, the Director of People & Organisational Development will raise it with the Vice-Chancellor and a Whistleblowing Officer will be identified. You will then be asked to contact the Whistleblowing Officer with your concerns in writing

Step 3

• Once you have told us about your concerns we will confirm receipt of the complaint and set out the University's immediate intended action, in writing, normally within five working days.

Step 4

- We will then review what action to take.
- If an internal investgation is required, an investigator will be appointed in line with Appendix B.

Step 5

• The investigation will begin with a confidential interview with you which will normally be held within five working days from the date of the Whistleblowing Officer's written confirmation.

Step 6

• The report of alleged malpractice will be investigated by following the University's Investigation Procedure.

<u>Ste</u>p 7

• You will not be identified in any subsequent investigation unless there is a legal requirement to do so, or consent is obtained in writing, or there is a belief that you have acted maliciously

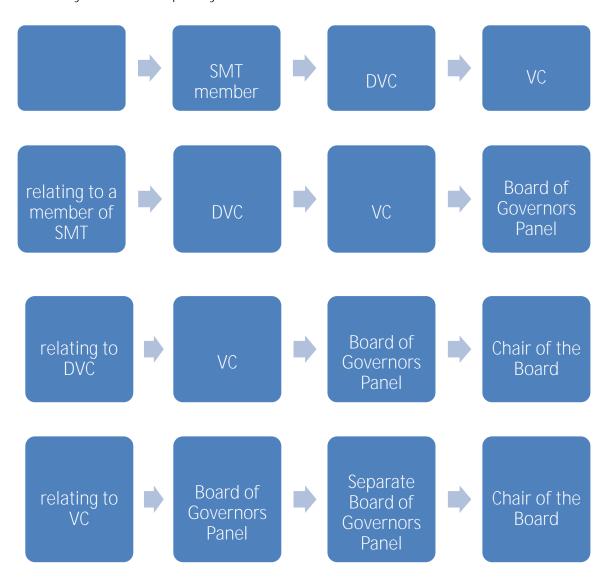
Step 8

• You will be notified of the outcome of the investigation and whether there will be any further action taken, and if so, under what policy.

Step 9

• If you are unhappy with the outcome of the internal investigation, you are entitled to raise the issue with your Trade Union or seek legal advice from a professionally qualified lawyer.

The report of alleged malpractice will be investigated by the Vice-Chancellor or other designated senior manager as appropriate, by following the University's agreed formal Disciplinary Procedure where the nature of the complaint and/or initial investigation concerns a qualifying disclosure and appears serious enough to warrant its immediate use. The individual investigating such a complaint will not be the person who will decide the outcome of the complaint – the process will be considered by a Hearing as set out in the University's formal Disciplinary Procedure.



Document Version:	0.7
Issuing Authority:	Audit Committee
Approval Authority:	Board of Governors
Author:	Director of People & Organisational Development

Date of Adoption: October 2016