

Staff Whistleblowing ('Speak Up and Listen') Policy

Approved by:	Effective date:	Next review:
Audit Committee	June 2026	October 2028

Staff Whistleblowing ('Speak Up') Policy

Canterbury Christ Church University ('the University', 'we', or 'us') commits to acting with honesty and integrity within a culture of openness and accountability to prevent and deal with illegal or unethical conduct as efficiently as possible.

Whistleblowing is reporting wrongdoing that has or could harm the University, staff, students, or the public.

An employee is protected by law if they report:

- a criminal offence, for example, fraud
- someone's health and safety are in danger
- risk of or actual damage to the environment
- a miscarriage of justice
- someone not carrying out a legal obligation
- sexual harassment
- the covering up of wrongdoing

The disclosure of the wrongdoing must be in the public interest.

When we talk about a concern being in the public interest, we mean that it affects more than just one individual and raises an issue that could have wider consequences for others or for the University as a whole.

The issue need not affect the general public or attract media attention to be in the public interest. Concerns affecting a group of students, a course, a department, or a particular setting within the University can still be in the public interest.

Personal grievances (for example, bullying, harassment, and discrimination) are not usually covered by this policy where they relate solely to an individual's personal employment position. In these cases, personal grievances should be addressed through the [Grievance Procedure](#).

However, disclosures relating to **sexual harassment**, serious harassment, abuse, or systemic failures may constitute protected disclosures where the employee reasonably believes the matter is in the public interest.

The University provides separate Guidance for students on the University's Whistleblowing Procedures.

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Importantly, in applying the Policy, we will promote psychological safety to create an environment where individuals feel encouraged and safe to express their concerns without fear of negative consequences.

Who needs to know about the Policy

- The Governing Body and its Committees
- The Vice-Chancellor and Principal/SMT
- Senior leadership teams
- Staff (full and part-time, permanent and temporary)
- Agency Workers, including Unitemps
- Associates
- Contractors
- Students' Union
- Students undertaking work for the University
- Those on work experience, apprenticeships or internships at the University

Staff at Partner Institutions

This Procedure applies to concerns relating to provision delivered through a partner institution where the concern relates to the University's contractual, academic, quality, oversight, regulatory, or other responsibilities.

The University may provide supplementary guidance explaining how whistleblowing concerns connected with partner institutions should be raised and how they will be considered.

Purpose of the Policy

The Whistleblowing Policy sets out the steps for reporting wrongdoing within the University.

Contacts

Governance and Legal Services is responsible for:

- providing advice and assistance
- Guidance
- accessing training.

The team can be contacted by emailing: glc.compliance@canterbury.ac.uk.

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Staff Whistleblowing Policy

1. Who is the Whistleblowing Policy for, and what does it cover?

Our Commitment

- 1.1. Canterbury Christ Church University ('the University', 'we', or 'us') is committed to acting with honesty and integrity within a culture of openness and accountability to prevent and deal with illegal or unethical conduct as efficiently as possible. The University encourages those reporting wrongdoing or danger at the University to report it to us as soon as possible after they become aware of it or suspect it.
- 1.2. There may be times when you need to make use of our Whistleblowing arrangements. The Policy sets out how to report wrongdoing concerns, knowing that you can do so without fear of reprisals, even if the concerns turn out to be mistaken. You can let someone know, as set out in section 2. The Policy also sets out what will happen after you have acted.
- 1.3. The Policy is not part of the employment contract and may be amended at any time. Any investigation already underway would continue under the old policy unless you expressly agree to proceed under the amended procedures.
- 1.4. In applying the Policy and delivering the accompanying training and briefings, we will promote psychological safety to create an environment where individuals can express their concerns without fear of judgment or negative consequences. Psychological safety means you will not suffer adverse consequences for speaking up about genuine concerns. It is a foundation for fostering an open and honest dialogue, making you feel confident and secure in raising genuine concerns.

Who can raise a concern under this Policy?

- 1.5. Anyone working for the University can raise a concern, including.
 - all staff (full and part-time, permanent or temporary)
 - those working under a contract for services
 - casual and agency workers, including Unitemps
 - associates
 - students undertaking work for the University, whether in a paid or voluntary capacity
 - those on work experience, apprenticeships or internships at the University
 - members of the Governing Body or its committees
- 1.6. In this Policy, all those working for the University are referred to as 'employees' or 'you.'

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- 1.7. The Policy does not apply to students, the Students' Union, conference delegates or visitors, unless they are deemed employees of the University. However, we provide Guidance for students on raising concerns covered by the Policy.
- 1.8. Most concerns should, where appropriate, be raised promptly through line management, your Head of School or Department, a staff representative, or the University's Speak Up and Listen arrangements. Under Speak Up and Listen, the University encourages reports relating to weaknesses in controls, governance, oversight, or compliance arrangements. Early local reporting can help to prevent further harm and support prompt action. However, using a local route is not a prerequisite to protection under this Policy. Where it is not appropriate to raise the concern locally, or where the concern requires formal protected disclosure, you may use the Whistleblowing ('Speak Up') Policy directly.
- 1.9. There may be times when you need to make use of our Whistleblowing arrangements. The Policy sets out how to report wrongdoing concerns, knowing that you can do so without fear of reprisals, even if the concerns turn out to be mistaken. You can let someone know, as set out in section 2. The Policy also sets out what will happen after you have acted.
- 1.10. Any employee who has a reasonable belief that there is serious malpractice relating to any of the protected matters specified in the Policy's Scope may raise a concern under this Policy here. The issues raised under the protected list may relate to another member of staff, a group of staff, the individual's own department or School, or another part of the University.

What is Whistleblowing?

- 1.11. 'Whistleblowing' means reporting or exposing wrongdoing or danger in the public interest. It concerns the disclosure of information that meets the statutory tests set out in the Employment Rights Act 1996 (as amended), including disclosures relating to sexual harassment, health and safety, criminal conduct, breach of legal obligations, environmental damage, miscarriages of justice, or attempts to conceal such wrongdoing.
- 1.12. When we talk about a concern being in the **public interest**, we mean that it affects more than just one individual and raises an issue that could have wider consequences for others or for the University as a whole.
- 1.13. The issue need not affect the general public or attract media attention to be in the public interest. Concerns affecting a group of students, a course, a department, or a particular setting within the University can still be in the public interest.
- 1.14. You may be concerned about wrongdoing or danger at work because of someone breaching the University's policies and procedures, including the Staff Code. The wrongdoing or danger may involve potential damage to the University's reputation or financial wellbeing.
- 1.15. Concerns should be raised through this Policy, where:

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- (a) the concern relates to systemic, repeated, or institutional failures;
- (b) the concern identifies risk to staff, students, or the wider public interest; or
- (c) other routes may not provide sufficient protection.

1.16. It is in addition to any rights staff may exercise under the Dignity at Work Policy or relevant HR and safeguarding procedures.

1.17. Under the Policy, a disclosure is a qualifying disclosure for protection if it meets all three conditions:

- (a) You are disclosing information, not just an allegation. "Information" means factual content showing or tending to show wrongdoing, not an opinion without substance.
- (b) The information concerns one or more of the following.
 - a criminal offence has been committed, is being committed or is likely to be committed;
 - a person has failed, is failing or is likely to fail to comply with a legal obligation;
 - a miscarriage of justice has occurred, is occurring or is likely to occur;
 - a danger to the health and safety of an individual;
 - damage to the environment;
 - sexual harassment has occurred, is occurring or is likely to occur, where sexual harassment means harassment of the kind described in [section 26\(2\)](#) of the [Equality Act 2010](#) (unwanted conduct of a sexual nature); and
 - the deliberate concealment of any of these matters.
- (c) You reasonably believe the disclosure is made in the "public interest." The public interest may include matters affecting a group of staff, students, service users, or the proper functioning, governance, or reputation of the University. It does not require the issue to affect society at large.

1.18. Importantly, we want to reassure you that if you report a concern to us, we will take you seriously and respect your confidentiality.

Protection from Detriment and Victimisation

1.19. There is legal protection for employees against unfair dismissal, employer penalties, or harassment by colleagues if they make a qualifying disclosure set out in paragraph 1.17. Whistleblowing protections apply regardless of the initial route used to raise the concern.

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- 1.20. The University will take all necessary steps to prevent an employee from suffering detriment for raising a concern under this policy. Any alleged detriment will be treated seriously and may lead to action under the University's staff [Disciplinary procedure](#).
- 1.21. Detriment includes any disadvantage, whether explicit or subtle, such as:
- (a) exclusion from meetings, training, or progression opportunities;
 - (b) unfavourable allocation of duties;
 - (c) adverse changes to working patterns or locations;
 - (d) unreasonably critical or hostile treatment; reputational harm; or
 - (e) coercion or pressure to withdraw a concern.

Relationship with other University procedures

- 1.22. This policy is primarily intended for concerns in the public interest that relate to wrongdoing affecting others or posing wider risks.
- 1.23. Concerns that relate solely or primarily to an individual's employment position, working relationship, or personal grievance will be handled under the University's grievance policies. Should you have a complaint about your own personal circumstances, such as the way you have been treated, use the University's [Grievance Procedure](#).
- 1.24. However, complaints involving sexual harassment, serious harassment, abuse, repeated institutional failings, or significant risk to health and safety may still constitute a protected disclosure under the law and be covered by this Policy where the employee reasonably believes the matter is in the public interest. Concerns of that kind may be raised under this Policy even where they also relate to conduct that could otherwise fall within grievance, dignity at work, or anti-bullying and harassment procedures. Employees will not be disadvantaged for raising such matters through this Policy where the public interest is engaged.
- 1.25. The University recognises that it may not always be clear which procedure, reporting route, or Designated Officer is most appropriate. If a concern is raised under the wrong procedure, with the incorrect individual, or through a route that is later found not to be the best fit, the University will redirect it appropriately, and the individual raising the concern will not be disadvantaged. We will keep you informed of our approach.

Brief decision guide: "Is this whistleblowing?"

If your concern is about...	You should normally use...
A criminal offence, fraud, bribery, serious wrongdoing, systemic failures, risks to others, serious misconduct, or sexual harassment	This Whistleblowing ('Speak Up') Policy

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or other harassment with wider impact or public-interest implications	
How you have been treated at work, where the issue does not affect others	Grievance Procedure.
Bullying or harassment where you are seeking personal resolution or remedial action, and where the concern does not raise wider public-interest issues	Anti-Bullying and Harassment Procedures
Immediate risk of harm or safeguarding concerns	Reporting a concern and Safeguarding Contacts

Relationship with free-speech duties

- 1.26. Nothing in this Policy restricts the lawful exercise of academic freedom or freedom of speech, nor does it prevent the reporting of harassment or abuse through protected disclosure routes. This Policy should be read in conjunction with the University's [Code of Practice on Free Speech](#) ('the Code'), which sets out how the University fulfils its legal duties under the Higher Education (Freedom of Speech) Act 2023.
- 1.27. The Code applies to staff, students, and visitors across all areas of teaching, research, public engagement, and University life. It confirms that lawful freedom of speech and academic freedom must be protected. It does not protect unlawful speech. Lawful speech, including provocative, controversial, or unpopular speech that may be offensive or hurtful to some, will not be restricted solely because it may cause discomfort or disagreement.
- 1.28. Where there is uncertainty about how to apply University policies concerning freedom of speech and academic freedom, the Code of Practice on Free Speech sets the interpretive framework. The Whistleblowing Policy must be read consistently with the Code of Practice, not the other way around.

2. How to raise your concerns if you suspect wrongdoing or danger at work, and who to raise them with

Step 1: Consider whether this Policy is the correct route

- 2.1. If your concern relates solely to your own personal employment circumstances, such as how you have been treated at work, use the University's [Grievance Procedure](#). However, where your concern involves sexual harassment, serious harassment, abuse, fraud, bribery, financial misconduct, significant health and safety risks, or other matters you reasonably believe are in the public interest, it may be appropriate to raise it under this Policy.
- 2.2. You may raise your concern through your School or Departmental Head, line manager, staff representative, or the University's Speak Up and Listen arrangements where that is appropriate and likely to lead to prompt operational action. However, there will be circumstances where this is not appropriate. In those cases, or where you wish to make a formal protected disclosure, move to Step 2 and the following

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reporting steps. For example, a local route may not be suitable where the concern relates to the person who would otherwise receive it, where confidentiality may be compromised, or where you do not feel able to raise it locally.

- 2.3. The Policy does not provide a means to question financial or business decisions made by the University, and it cannot be used to reconsider matters that should or have already been addressed under other relevant policies.
- 2.4. If you are unsure which route is most appropriate, you may seek confidential advice from Governance and Legal Services or one of the external advice services listed in section 2.21 before raising the concern formally.
- 2.5. An acknowledgement does not mean that we will pursue your disclosure.
- 2.6. If you feel unable to report wrongdoing yourself, you may raise it with a colleague or your Trade Union representative instead.
- 2.7. If you raise a concern under this Policy and it is later assessed as more appropriately dealt with by another University procedure, Designated Officer, or reporting route, the University will ensure the concern is redirected accordingly. You will not be disadvantaged for raising the concern, and whistleblowing protections will apply where the statutory criteria are met.

Step 2: Determining if there is an emergency or a safeguarding issue.

- 2.8. If at any point you believe there is an **immediate risk to someone's health, safety or wellbeing**, or that there may be a **safeguarding emergency**, your priority is to make sure that the person at risk is safe. There is advice on the webpage: [In case of an emergency](#).
- 2.9. In these circumstances, you should:
 - 2.10. **Contact the emergency services** (999) without delay if there is an immediate danger to life or a serious risk of harm. Please contact University Security Services (01227 92**2111**) *after* calling 999 for any concerns on campus.
 - 2.11. **Follow the University's [Safeguarding Policy](#)**, including contacting the appropriate Safeguarding Officer / Safeguarding Contacts as soon as possible. Details are set out in the University's [Student Safeguarding Guide](#).
 1. Once any immediate risk has been addressed, you should then decide whether it is appropriate to **raise a whistleblowing disclosure under this Policy** by following the next steps (Setting out the Concern and submitting a report to a Designated Officer).
- 2.12. Taking urgent safeguarding or emergency action **does not prevent** you from also making a whistleblowing disclosure where the statutory criteria are met.

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Step 3: Setting out the Concern

- 2.13. If you have a concern about wrongdoing or danger at work that needs to be made as a Whistleblowing disclosure, you are encouraged to raise it as soon as reasonably practicable so that it can be considered and addressed appropriately. Concerns may relate to matters that have already occurred, are ongoing, or are likely to occur.
- 2.14. You do not need to be certain that wrongdoing has taken place. A concern may still be protected where you reasonably believe you can provide information to show wrongdoing or a serious risk, even if it later turns out to be mistaken.
- 2.15. You do not need to have all of this information before raising a concern. Include as much as you reasonably can. Here is a list of things to think about, but it is here to help you make a report. It is not required that you use it to report a concern, but it will help the University investigate it. You can, if you wish, make use of our online form.

1. What happened (or what you are worried might happen)

- A clear description of the concern or wrongdoing
- What you saw, heard, or became aware of
- Whether the issue is ongoing, has already happened, or is likely to happen

2. When and where

- Dates and times (or approximate timeframes)
- Locations (for example, a particular building, School, department, placement, or online setting)

3. Who is involved

- Names and/or roles of individuals involved (if known)
- Whether the concern involves staff, students, contractors, or others

4. How you became aware of the issue

- Whether you witnessed it directly
- Whether it was reported to you by someone else
- Whether you have documents, messages, or other information

5. Why you are concerned

- The harm, risk, or wrongdoing that you believe may be involved
- Whether others may be affected (students, staff, the University, or the public)

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- Why it is you believe the issue may be in the public interest

6. Evidence (if available)

- Documents, emails, messages, screenshots, or records
- Where relevant information might be located if you do not have the evidence

You are not required to gather evidence yourself or to put yourself at risk.

7. What steps you have already taken (if any)

- Whether you have raised the concern before
- Who you raised it with and when
- What response, if any, you received

8. Your preferred contact details

- Your name and contact information (if you are willing to provide it)
- Whether you would like your identity to be kept confidential
- Whether you are raising the concern anonymously
- Anonymous disclosures are accepted, but providing contact details may help the University investigate and keep you informed

What you do not need to do

- You do not need to prove wrongdoing
- You do not need legal knowledge
- You do not need to (and should not) investigate the matter yourself
- You do not need to be certain — a reasonable belief is enough as long as you act in the public interest

Step 3: Submitting the Report to the Designated Officer

2.16. Where appropriate, concerns should normally be raised with one of the following Designated Officers, depending on the subject of the disclosure. If that is not appropriate, or if the concern relates to the relevant Designated Officer, the escalation arrangements below apply.

2.17. Designated Officers for raising concerns.

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Type of concern	Designated Officer	When this route should not be used
Fraud, bribery, corruption, damage to the environment, misuse of funds, false accounting, procurement irregularities, or failures in financial controls.	Director of Finance: by emailing director.finance@canterbury.ac.uk	Where the concern relates to the Director of Finance: Raise the matter with the Vice-Chancellor.
Sexual harassment and health and safety matters	Chief People Officer: by emailing hr.advisors@canterbury.ac.uk	Where the concern relates to the Chief People Officer: Raise the matter with the Vice-Chancellor.
Conduct or collective decision-making of a board or committee; failures to meet legal obligations; illegality; miscarriages of justice	University Solicitor: by emailing gls@canterbury.ac.uk and headed 'For the Immediate Attention of the University Solicitor'	Where the concern relates to the University Solicitor: Raise the matter with the Vice-Chancellor.

When to Raise the concern with the Vice-Chancellor and Principal

2.18. You may raise a concern directly with the Vice-Chancellor and Principal by emailing vc@canterbury.ac.uk in the circumstances set out below. The Vice-Chancellor and Principal will act as the Designated Officer.

Type of concern	When direct escalation is appropriate	When this route should not be used
Concern involves a senior officer	Where the concern relates to the Director of Finance, Chief People Officer, or University Solicitor	Where the concern relates to the Vice-Chancellor and Principal: Raise the matter with the Chair of the Governing Body or the Chair of the Audit Committee.
Earlier internal escalation is not appropriate or effective	Where you reasonably believe that raising the concern through earlier internal routes, including to the otherwise relevant Designated Officer, would be inappropriate, compromised, or unlikely to lead to effective action	

When to raise a concern at a governance level

2.19. You may raise a concern directly with the Chair of the Governing Body or the Chair of the Audit Committee only where the circumstances set out below apply. Governance-level escalation is reserved for concerns involving the Vice-Chancellor and Principal or concerns indicating serious, widespread, or systemic management failings affecting the University as a whole and requiring governance-level oversight. In such cases, the Chair will act as the Designated Officer.

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Type of concern	When should the concern be raised at the governance level	When this route should not be used
Concern involves the Vice-Chancellor and Principal	Where the concern relates to the conduct, decisions, actions, or omissions of the Vice-Chancellor and Principal, such that escalation through management routes would be inappropriate, by emailing glc.compliance@canterbury.ac.uk and headed 'For the Immediate Attention of the Chair of the Governing Body or Chair of the Audit Committee'	Where the concern does not involve the Vice-Chancellor and Principal and can reasonably be addressed through earlier escalation routes
Serious and systemic management failings at a University level	Where the concern indicates serious, widespread, or systemic management failings affecting the University as a whole and requiring governance-level oversight	Where the concern is isolated, operational, or capable of being addressed through management action or other University procedures

Anonymous concerns

2.20. Concerns may be raised anonymously. However, anonymous disclosures may be more difficult to investigate and may limit the action that can be taken. Where possible, you are encouraged to provide contact details so that further information can be sought if required.

Raising a Concern Externally

2.21. Rather than raising concerns internally, you can raise your concern with a prescribed person or body from the list published by the Government to assist people with concerns about wrongdoing or danger at work. You can find the list by following this link: [Whistleblowing](#): list of prescribed people and bodies - GOV.UK. Alternatively, you could raise it with our regulator, the Office for Students.

Where you can get advice

2.22. Should you be uncertain whether something is within the scope of this Policy, which route to use, or which Designated Officer is appropriate, you can seek confidential advice from the University Solicitor and Clerk to the Governing Body. Sometimes, it may be more appropriate to use another procedure, and if so the University will help ensure the concern is redirected appropriately.

2.23. We recognise it may be difficult for you to tell us something has gone wrong. It can cause stress and anxiety. There are sources of external advice:

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- (a) You can discuss the situation with Protect, an independent whistleblowing charity. These are Protect's contact details: 0203 117 2520, www.protect-advice.org.uk.
- (b) There is an independent, confidential counselling helpline provided by Spectrum Life, 0808 196 2016.
- (c) You could seek independent legal advice by contacting a solicitor.
- (d) You can get further information from the Advisory, Conciliation and Arbitration Service (Acas) (telephone 0300 123 1100) and Citizens Advice (telephone 0800 144 8848).

2.24. You can ask for support from your trades union.

2.25. We provide online training to help you better understand this process.

3. What happens after you raise a concern

Confidentiality and protection

- 3.1. If you raise a concern under this Policy, the University will treat it seriously and sensitively. We will take all reasonable steps to keep your identity confidential and to protect you from victimisation or reprisals.
- 3.2. We will take all reasonable steps to promptly and efficiently address your report of wrongdoing.

Acknowledgement, Preliminary Handling and Notification

- 3.3. The Designated Officer will usually acknowledge receipt of your disclosure and ensure it is handled promptly, fairly, and proportionately.
- 3.4. Acknowledgement will typically be made within 5 working days of receipt of the concern.
- 3.5. The acknowledgement will confirm:
 - that the disclosure has been received; and
 - who will handle the initial assessment.
- 3.6. The Designated Officer will make an appropriate record and ensure notification of the disclosure to the correct level. Depending on the concern, this will typically be one or more of the following:
 - (a) the Vice-Chancellor and Principal;
 - (b) the Chair of the Governing Body;

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(c) the Chair of the Audit Committee.

Initial assessment

- 3.7. Following this, the Designated Officer will carry out an **initial assessment** to determine:
- whether the concern falls within the scope of this Policy;
 - whether it should be investigated under this Policy or referred to another procedure; and
 - what level of investigation, if any, is required and its scope.
- 3.8. The Designated Officer may arrange a meeting with you if necessary. If so, you can request that a trusted person accompany you. Notes will be taken to produce a written summary of the key points, which you will be asked to confirm as an accurate record.
- 3.9. Alternatively, the Designated Officer may request written clarification of points or further information rather than arrange a meeting.
- 3.10. Where appropriate, the Designated Officer may decide that the wrongdoing should be investigated under the University's Disciplinary Procedure, Fraud and Bribery Response Plan, or another relevant procedure.
- 3.11. Usually, the Designated Officer completes the initial assessment within 20 working days of receipt of your disclosure. The Designated Officer will notify you of the outcome of the initial assessment and confirm if we are taking any further action or if your disclosure is closed.

Investigation

- 3.12. Where an investigation is required, an investigator will be appointed. The investigation will typically begin within 10 working days of the initial assessment decision.
- 3.13. The investigator might be internal or external, depending on the concern, the seriousness of the issues raised, and the need for independence.
- 3.14. The investigator may be the designated person to whom the concern has been declared or, where appropriate, another person nominated by the designated person.
- 3.15. The length of an investigation will depend on the nature and complexity of the issues, but the University will aim to progress investigations without unnecessary delay. Where investigations extend over a longer period, the University will aim to provide periodic updates, even where there is no substantive outcome to report.
- 3.16. Some investigations, particularly those involving multiple parties, external agencies, or complex financial or governance issues, may take significantly longer, especially when an external investigator is engaged.
- 3.17. If the investigator needs to know your identity, we will discuss this with you beforehand.

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- 3.18. If you agree to us sharing your identity, the investigator may invite you to a meeting, but you do not have to agree to attend. If you agree to a meeting, you can request that a trusted person accompany you. Notes will be taken to produce a written summary of the key points, which you will be asked to confirm as an accurate record.
- 3.19. Alternatively, the investigator may request written clarification of points or further information rather than arrange a meeting. You may respond without revealing your identity, but you are not under an obligation to respond.
- 3.20. We ensure that no investigation is carried out by any person who may have had any previous engagement in the subject of the disclosure.

Fairness to those involved

- 3.21. Usually, we will give an individual involved in suspected wrongdoing a full opportunity to explain their involvement, unless doing so would compromise the investigation or present a risk to you or to others.

Keeping you informed

- 3.22. We will aim to keep you regularly informed of the progress and outcome of any investigation.
- 3.23. If the University decides that no further action will be taken, you will be told the reason for this decision.
- 3.24. The University will write to you within three months of the commencement of the investigation.
- with the outcome of our investigation, or
 - to advise you if we require more time, the reasons for this and the expected date of completion
- 3.25. The need for confidentiality, data protection, or employment law obligations, particularly where disciplinary action is involved, may prevent us from disclosing information about the matter to you.

Confidentiality during the process

- 3.26. The investigation will be conducted confidentially. We expect you to maintain confidentiality whilst procedures are ongoing.
- 3.27. You can discuss matters with the person or persons who are advising you to seek their advice (for example, a trade union representative, legal adviser, or Protect), on the understanding that those persons would also respect confidentiality.

Outcomes, learning, and governance oversight

- 3.28. Once an investigation has concluded, the University will:

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- (a) consider the findings;
- (b) determine any actions or recommendations, including reporting or referral to external bodies; and
- (c) provide you with appropriate feedback as soon as reasonably practicable. The level of detail shared may be limited by confidentiality, data protection, or employment-law obligations.

3.29. The investigator(s) may make recommendations for change, including improvements to policies, procedures, systems, or controls to reduce the risk of future wrongdoing. Themes and lessons arising from whistleblowing concerns may inform the University's risk registers, internal controls, and assurance planning.

Audit Committee oversight

3.30. The Audit Committee has oversight of the effectiveness of the University's whistleblowing framework. It does not investigate individual concerns or determine case outcomes.

3.31. The Vice-Chancellor and Principal will ensure the below are reported to the Audit Committee at least annually:

- the operation of the whistleblowing arrangements;
- any significant or systemic issues identified; and
- actions taken to address themes or control weaknesses.

4. Safeguards are in place to protect you.

The right to be accompanied

4.1. You are entitled to be accompanied by a work colleague or a Trade Union representative at any meetings held under the Policy.

No confidentiality clauses

4.2. No contractual term, confidentiality clause, or non-disclosure agreement prevents an employee from making a protected disclosure under this Policy or under whistleblowing legislation. It includes disclosures relating to sexual harassment, abuse, or other unlawful conduct.

Reasonable steps to protect confidentiality

4.3. Your disclosure will be kept confidential until an investigation is launched. After the investigation is launched, your identity will also be kept confidential, if requested by you, unless this is incompatible with fairness or if there is an overriding reason for disclosure (for example, if required by law).

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- 4.4. We will take all reasonable steps to protect your identity. We will inform you if we cannot continue respecting your anonymity. However, we may not prevent others, including those implicated in your report, from deducing your name.

Complaints of retaliation because of disclosure

- 4.5. If you have reported suspected wrongdoing under this Policy and you receive any reprisals, threats, or other unfavourable treatment, or experience victimisation, we may take disciplinary action against the individual(s) responsible. You should notify the person to whom you reported the wrongdoing of any such treatment as soon as possible. Should you consider the matter unresolved despite flagging it, use the University's [Grievance Procedure](#).
- 4.6. Where it is determined that there is a case that an employee suffered adverse treatment, harassment or victimisation because of a disclosure, a further investigation may take place, and disciplinary action may be taken against the perpetrator under the University's [Disciplinary Procedure](#).

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Document Information	Description of Document Information
Document Title	Staff Whistleblowing ('Speak Up') Policy
Department Owner	Governance and Legal Services
Document Category	Financial - Documents relating to accounting, budgeting, procurement, travel and other financial functions Governance - Documents relating to the governance of the University
Document Owner	Governance and Legal Services
Document Manager	University Solicitor and Clerk to the Governing Body
Related University Policies	Fraud, Bribery and Corporate Corruption Policy Safeguarding Policy
Related University Procedures	In case of an emergency Financial Procedures Fraud and Bribery Response Plan Grievance Procedure. Disciplinary procedure Whistleblowing Student Guidance
Approved by	Audit Committee
Date Approved	May 2026
Date of Commencement	May 2026
Review Date	October 2028
Version	Version 4
History of revisions of the Document	Version 1, approved by Audit Committee 13 May 2020 Version 2, approved by Audit Committee 21 February 2022 Version 3, approved by Audit Committee 3 April 2024 Version 4, approved by Audit Committee May 2026

Staff Whistleblowing ('Speak Up and Listen') Policy

Document Information	Description of Document Information
Web Address	Staff Whistleblowing Policy