



WHISTLEBLOWING POLICY

POLICY STATEMENT

1. The University is committed to high standards of openness, probity and accountability and all staff and students are expected to maintain these high standards. The Board of Governors has approved this Whistleblowing Policy and Procedure (“the Policy”) in place to promote that culture and facilitate the reporting and addressing of wrongdoing by members of staff.
2. This Policy sets out how the University complies with its duty under the Public Interest Disclosure Act 1998 and its framework for dealing with allegations of illegal and improper conduct.
3. The purpose of this Policy is:
 - (a) To encourage members of the University to identify and report suspected or actual wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected, supporting a culture of integrity.
 - (b) To provide guidance on how to raise concerns and reassure potential whistleblowers that where genuine concerns are raised in the public interest, these can be done so without fear of reprisals, even if they turn out to be mistaken.
 - (c) To set out procedures for investigating suspected or actual wrongdoing when it is reported, and promptly addressing concerns when they occur.
 - (d) To act as a deterrent to corrupt practices and help protect the reputation of the University.
3. This policy does not form part of any employee’s contract of employment and it may be amended at any time.

WHO IS COVERED BY THIS POLICY?

4. This policy applies to all individuals employed at all levels of the University, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as “staff” in this policy) and all registered students of The University.
5. Any employee or former employee (as well as certain workers, contractors, trainees and

agency staff meeting the definition of “worker”¹⁾ of the University can raise a disclosure under this Policy with the legal protections set out in within it.

6. Students, members of the Board of Governors, and others can use this Policy as a route to raise concerns but do so without the legal protections afforded to whistleblowers under employment law. Whilst the Policy does not apply to disclosures made by members of the public, including suppliers or other third parties, any such person who has information about matters that fall within the scope of this Policy is encouraged to provide that information to the Whistleblowing Officer.

ROLES AND RESPONSIBILITIES

7. The University’s Board of Governors has overall responsibility for this policy and has designated its Audit & Risk Committee as the body to oversee the proper conduct of investigations of whistleblowing disclosures and to ensure that the provisions of the Policy are properly applied.
8. The Board of Governors has designated the University Secretary & Registrar as the Whistleblowing Officer, who has day-to-day operational responsibility for this policy. Any queries about the Policy should be referred to the Secretary & Registrar in the first instance. The Secretary & Registrar must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
9. The Secretary & Registrar, in conjunction with the Board of Governors, should review this policy from a legal and operational perspective at least biennially.
10. The University Secretary shall keep a register of disclosures made under this Policy and shall submit to the Audit & Risk Committee as part of the yearly reporting cycle an anonymised report of all disclosures and any actions taken.
11. All staff and students are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff and students are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the [Secretary & Registrar](#).

WHAT IS WHISTLEBLOWING?

12. “Whistleblowing” is the disclosure of information which relates to suspected wrongdoing or dangers at work. It is also known as “making a disclosure” or “blowing the whistle”.

¹ Public Interest Disclosure Act 1998, s43K <https://www.legislation.gov.uk/ukpga/1998/23/section/1>

WHAT CONCERNS CAN YOU RAISE UNDER THE POLICY?

13. Anyone making a disclosure must **reasonably believe** they are **acting in the public interest**, and that the matter they are disclosing relates to **past, present or likely future** wrongdoing in one of the following categories:
- (a) Criminal activity.
 - (b) Breach or failure to comply with any legal or professional obligation or regulatory requirements (including any breach of the regulatory framework of the Office for Students).
 - (c) Miscarriages of justice.
 - (d) Danger to health and safety.
 - (e) Risk or actual damage to the environment.
 - (f) Sexual harassment.²
 - (g) The deliberate concealment of any of the above matters.
14. The Policy is **only** intended to be used for raising concerns under these matters.
15. The Policy is **not intended** to be used for:
- (a) Raising complaints relating to an individual's own personal circumstances.
 - (b) Broader matters that fall within the scope of any other University policy or procedure. For example (but not limited to) the [Student Complaints Procedure](#), [Academic Appeal Policy](#) (for students), [Grievance Policy & Procedure](#) (for employees), [Anti-Bribery Policy](#) and [Fraud Policy](#).
 - (c) To re-hear matters already concluded under this or such other policies or procedures.
16. The Whistleblowing Officer is the arbiter of whether a matter is in scope of this Policy, though they may consult relevant senior colleagues in reaching a conclusion.

SPEAKING OUT TO RAISE A WHISTLEBLOWING CONCERN

17. The full Whistleblowing Procedure is set out at [Appendix 1](#). Please read this before submitting a concern.
18. In the first instance you should raise any concerns with the Whistleblowing Officer. You may tell the Whistleblowing Officer in person or put the matter in writing if you prefer. The Whistleblowing Officer may be able to agree a way of resolving your concern quickly and effectively.
19. The Whistleblowing Officer will consult with the Chair of Audit & Risk Committee on all Whistleblowing matters.

² From 06 April 2026, under the [Employment Rights Act 2025](#) (s23)

20. However, where the matter is more serious, or you feel that the Whistleblowing Officer has not addressed your concern, or you prefer not to raise it with them for any reason, you can escalate your concern, in the order below, to one of the following:
- (a) The Vice-Chancellor.
 - (b) The Chair of the Audit & Risk Committee.
 - (c) The Chair of Governors.
21. Once you have raised a concern with the Whistleblowing Officer (or one of the individuals above, where you cannot raise it with the Whistleblowing Officer), an initial assessment to determine the scope of any investigation will be carried out. You will be informed of the outcome of the assessment.
22. You may be required to attend additional meetings in order to provide further information, however you are not required to provide evidence for the University to look into the concerns raised. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
23. In some cases an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter may be appointed. The investigator(s) may make recommendations for change to enable the risk of future wrongdoing to be minimised.
24. You will be kept informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent disclosure of specific details of the investigation or any disciplinary action taken as a result to you. You should treat any information about the investigation as confidential.
25. If it is concluded that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

CONFIDENTIALITY

26. Anonymous disclosures made under this Policy are permitted but will not normally receive feedback and may limit the scope of any investigation.
27. The University is committed to taking all reasonable steps to maintain the confidentiality of the whistleblower where it is requested (unless required by law to break that confidentiality)
28. Those invoking the Policy will be expected to retain confidentiality in respect of the disclosure during the investigation and the consideration of any action to be taken, so as to avoid prejudicing that investigation or outcome. This will not preclude the whistleblower from taking any necessary professional advice in respect of the disclosure (including Trades Unions) but the requirement for confidentiality in such cases will also

apply to the professional advisor or advisors concerned. A breach of confidence could result in disciplinary and/or legal action.

29. All individuals involved who contribute or are privy to information as part of a whistleblowing investigation are subject to strict confidentiality obligations in order to protect and respect all individuals involved in the process.
30. Whistleblowers should not actively gather evidence of any suspected wrongdoing as this may constitute misconduct in itself and may thereafter affect protections afforded under whistleblowing legislation.

PROTECTIONS

31. Anyone making allegations in the reasonable belief that their complaint is being made in the public interest will be protected from being victimised, discriminated against or disadvantaged for doing so.
32. Anyone raising disclosures under this Policy will be treated fairly and no detrimental or negative treatment will be taken against a whistleblower on the grounds that they have raised a disclosure under this Policy. The University will take all reasonable steps to prevent detriment to those making disclosures as all acts of victimisation against whistleblowers are a breach of employment rights. Any detrimental action by any member of the University against a person for making a protected disclosure will not be tolerated and the individual/s responsible may be subject to disciplinary action. Any individual who believes that they have been subjected to unfair treatment as a result of making a disclosure should inform the Whistleblowing Officer immediately and we will take action to protect those who raise a concern.
33. The law provides additional protection for those raising whistleblowing disclosures under the Public Interest Disclosure Act 1998 (amending the Employment Rights Act 1996). Such protections, and the efforts to maintain confidentiality, apply only to disclosures within the scope of the Policy, and do not apply to any other matters that may be under discussion or going through other internal or external processes.

EXTERNAL DISCLOSURES

34. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
35. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or other [prescribed person or body](#) so designated by the UK Government. It will very rarely if ever be appropriate to alert the media. Staff, students and governors are strongly encouraged to seek advice before reporting a concern to anyone external. You should contact the Whistleblowing Officer or one of the other individuals set out in paragraph 11 for guidance.

36. Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a student, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, you are encouraged to report such concerns internally first.
37. [Protect](#) (formerly Public Concern at Work) are leading experts in whistleblowing and can provide independent, confidential support and guidance for individuals on matters relating to whistleblowing disclosures.

IF YOU ARE NOT SATISFIED

38. While the University cannot always guarantee the outcome you are seeking, your concern will be dealt with fairly and in an appropriate way. By using this Policy you can help us to achieve this.
39. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 11.

PROTECTION FOR WHISTLEBLOWERS

40. It is understandable that whistleblowers are sometimes worried about possible repercussions. The policy aims to encourage openness and support will be given to staff and students who raise genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
41. The whistleblower must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using the [Staff Grievance Policy & Procedure](#) or the [Student Complaints Procedure](#) as appropriate.
42. Staff and students must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

CONTACT INFORMATION

Vice Chancellor

Prof Charles Egbu
0113 283 7102
joa.scott@leedstrinity.ac.uk

**Whistleblowing Officer / University
Secretary & Registrar**

Ms Caroline Thomas
0113 517 2917
Ca.thomas@leedstrinity.ac.uk [mailto:](mailto:Ca.thomas@leedstrinity.ac.uk)

Chair of the Board of Governors

Mr Jamie Hanley
Private & Confidential
c/o Leeds Trinity University
Brownberrie Lane
Horsforth
Leeds
LS18 5HD

Chair of the Audit Committee

Mr M Holden
Private & Confidential
c/o Leeds Trinity University
Brownberrie Lane
Horsforth
Leeds
LS18 5HD

Protect- speak up stop harm
(Independent whistleblowing charity)

Helpline: (020) 31172520
Website: www.protect-advice.org.uk

SUPPORT AND INDEPENDENT ADVICE

43. Whistleblowers may wish to seek support from their Trade Union official or the Employee Assistance Programme (in the case of a staff member) or the Students' Union (in the case of a student).
44. Staff are also entitled and encouraged to seek independent advice. Independent guidance can be accessed as follows (but is not limited to):
- (a) [Protect](#) (formerly Public Concern at Work), as well as being leading experts in whistleblowing, provide confidential advice for individuals who witness wrongdoing in the workplace but are unsure how to raise their concerns, and help to individuals who are facing victimisations at work for whistleblowing. Protect advisers also provide advice and information on whistleblowing law.
 - (b) [Citizens' Advice](#) provide independent advice regarding legal protections.
 - (c) [Advisory, Conciliation and Arbitration Service \(ACAS\)](#) for help and advice for workers and employers on rights and obligations at work

POLICY MANAGEMENT AND RECORD KEEPING

45. Any disclosure made under this Policy, will be reported by the Whistleblowing Officer to the Audit & Risk Committee at its next meeting. Reports will protect the identify of those making disclosures.
46. The Audit & Risk Committee shall receive an annual report on the effectiveness of the whistleblowing arrangements.
47. This Policy shall be made available to all colleagues, and it will be published publicly on the University's website.
48. The Governance & Compliance Team will have responsibility for maintaining and overseeing this Policy and its associated procedure, conducting a biennial review, or review at the release of updated regulatory requirements or at the conclusion of an investigation if sooner. The University will take into account emerging best practice in the sector and more widely and review the Policy in conjunction with the University's policies and procedures on fraud, theft, bribery and corruption. Any proposed amendments or changes will be put to the Audit & Risk Committee for approval.
49. The University limits the number of people who have access to whistleblowing records and who are subject to strict confidentiality obligations. An access log is maintained by the Governance & Compliance Team, this includes:
 - (a) The Whistleblowing Officer.
 - (b) A limited number of members of the Governance & Compliance team responsible for processing whistleblowing records.
50. Additionally, restricted, time-limited access may be granted / information shared as follows:
 - (a) Investigator/s (on a temporary basis to restricted case files only).
 - (b) If, during the investigation the whistleblower or others are invited to give evidence, they may be accompanied by their Trade Union official or a work colleague (in the case of a staff member) or a Students' Union representative or current fellow student (in the case of a student). The representatives are bound by confidentiality requirements as set out in paragraphs 23-25. The Whistleblowing Officer will have responsibility to approve sharing any relevant case information with representatives in advance of any investigatory meetings.
 - (c) On occasion, disclosures (restricted case files only) may require immediate referral to an external body for consideration and investigation.
51. The Governance & Compliance team will log all complaints received and maintain a confidential register of all confirmed Public Interest Disclosure cases which are investigated within the University.

RELATED DOCUMENTS

[Staff Grievance Policy & Procedure](#)

[Student Complaints Procedure](#)

Conflicts of interest

[Reportable Events Procedure](#)

[Public Interest Disclosure Act 1998](#) (amending the [Employment Rights Act 1996](#)).

[Whistleblowing Code of Practice](#)

The University is subject to the [Freedom of Information Act 2000](#) which contains exemptions that may be applicable to permit the withholding of information identifying the whistleblower, including:

- Section 40 Personal Data.
- Section 41 Information provided in confidence which, if disclosed, would give rise to an actionable breach of confidence.

The University will be mindful, in complying with its legal obligation to disclose information it holds under the Freedom of Information Act 2000, of its other legal obligations under:

- The [Public Interest Disclosure Act 1998](#) to avoid the discrimination or victimisation of employees or any other detriment on the part of the employee; and
- [The Health and Safety at Work etc. Act 1974](#), to protect the health and safety (including mental health) of employees.



WHISTLEBLOWING PROCEDURE

This document provides information about the University's approach to handling whistleblowing complaints.

Stage 1 - Making a disclosure complaint

1. A disclosure of factual information should be made in writing to the Whistleblowing Officer³ in the first instance by emailing governance@leedstrinity.ac.uk.
2. However, if the matter is more serious; you feel that the Whistleblowing Officer has not addressed your concern; or it is otherwise inappropriate for any reason to make a disclosure to the Secretary & Registrar as the Whistleblowing Officer you may escalate your concern to the following individuals, in the order set out below:
 - (a) The Vice-Chancellor.
 - (b) The Chair of the Audit & Risk Committee.
 - (c) The Chair of the Board of Governors.
3. If you choose to escalate your concern you must also set out in your correspondence your reasons for not addressing, or continuing to address, your concern to the Whistleblowing Officer.
4. A disclosure will normally be acknowledged, in writing, within five working days of receipt.

Stage 2 - Initial consideration

5. A decision on how to proceed shall normally be made, in writing, within four weeks of receiving the disclosure. If the decision is likely to take longer, the Whistleblowing Officer (or where escalated one of the individuals set out in paragraph 2) shall inform the whistleblower in writing and, if appropriate, any person who may be the subject of the disclosure, of the reasons for the delay.
6. The Whistleblowing Officer will determine whether or not the matter falls in the scope of this Policy (and appears to meet the tests for Public Interest) and should be investigated and, if so, by whom. Depending on the nature and circumstances of the disclosure, the Whistleblowing Officer may:

³ This procedure assumes that it is the Whistleblowing Officer who has received the disclosure. Where this is not the case, references should also be taken to apply to the Chair of the Audit & Risk Committee as appropriate.

- (a) decide not to proceed with the matter; or
- (b) refer the matter to be dealt with under a different policy or procedure; or
- (c) authorise an internal investigation under this Policy where it meets the tests for Public Interest. The matter may also be referred to the police or other appropriate authority (see paragraph 10 below).

7. In cases where the Whistleblowing Officer determines the matter to be out of scope of the Policy, the complainant and the Audit & Risk Committee will both be informed in writing. In those circumstances, the complainant will be advised of the applicable University policy or procedure through which their concerns should be raised. The Audit & Risk Committee may, on occasion, direct the Whistleblowing Officer to take further action as it sees fit.

Stage 3 - Investigation of a disclosure

- 8. The University will promptly investigate any reasonable report of a concern in order to identify verifiable facts and ensure fairness.
- 9. The investigator will be determined by the Whistleblowing Officer, who may entrust the investigation to an independent member of staff or persons from outside the University.
- 10. Where any person involved in the investigation process has a perceived or actual conflict of interest, this will be managed in accordance with the Conflicts of Interest Policy.
- 11. On occasion, disclosures may require immediate referral to an external body for consideration and investigation (for example the police, Health & Safety Executive, National Audit Office, or relevant funding body), and in such cases the external body's processes shall take precedence. In other cases, such referral may be necessary or appropriate following the conclusion of the University's investigation. A decision to refer will be made by the Whistleblowing Officer, in consultation with the Chair of the Audit & Risk Committee.
- 12. If, during the investigation the whistleblower or others are invited to give evidence, make representations or otherwise communicate with the investigator, they may be accompanied by their Trade Union official or a work colleague (in the case of a staff member) or a Students' Union representative or current fellow student (in the case of a student). Where the disclosure relates to the conduct of an individual member of staff, they shall normally be given an opportunity to make representations to the investigator and to be accompanied by their Trade Union official or work colleague.

Stage 4 - Outcomes of an investigation

- 13. The nominated investigator shall report their findings to the Whistleblowing Officer as soon as is practical. On receipt of the outcomes of the investigation, the Whistleblowing

Officer will determine if there has been wrongdoing. If so, the Whistleblowing Officer will determine what action, if any, should be taken; this may include invoking other approved University procedures or reference to an appropriate external authority. The Whistleblowing Officer will report the outcome to the Vice-Chancellor and to the Audit & Risk Committee.

14. On receipt of the outcome report, the Audit & Risk Committee may direct the Whistleblowing Officer to undertake further investigation. In such cases, the Whistleblowing Officer will be required to make a further report to the Vice-Chancellor and to the Audit & Risk Committee on any subsequent action taken.

15. If appropriate, the Whistleblowing Officer may determine that as a result of the findings of an investigation, the matter should be referred to the University Executive Group for consideration under the Reportable Event Procedure.

16. A whistleblower does not have a legal right to feedback, however the University recognises the value in communicating actions taken to consider concerns and any steps taken to address these. Where appropriate and circumstances allow, the Whistleblowing Officer will provide feedback to the whistleblower on the findings of an investigation.

17. When the above stages have been exhausted, the matter will be concluded in so far as the University's own procedures are concerned.

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