



Whistleblowing Procedure

Organisation	Leeds Beckett University
Owner	Registrar & Secretary's Office (RSO)
Key Contacts	Registrar & Secretary ; Chair of the Audit Committee ; Policy & Projects Team
Target audience	Individuals making raising a concern under the Whistleblowing Policy
Sensitivity	Public
Last Review date	02-2026
Status	Published
External contacts	Protect ; Citizens' Advice ; Advisory, Conciliation and Arbitration Service (Acas)
Appendices	Appendix 1 - Whistleblowing Procedure flowchart Appendix 2 - Examples of Qualifying Disclosures

! This document provides information about how the University's handles whistleblowing complaints and should be read in conjunction with the University's [Whistleblowing Policy](#).

Stage 1: Making a disclosure under the [Whistleblowing Policy](#)

1. If you suspect wrongdoing or danger affecting the University, speak to your line manager or HR in the first instance, if possible.
2. To formally raise concerns, write to the **Designated Officer** at registrarsecretary@leedsbeckett.ac.uk as soon as reasonably practicable. A disclosure will normally be acknowledged, in writing, within five working days of receipt.

! If concerns relate to the Registrar & Secretary or the Vice Chancellor, contact the [Chair of Audit Committee](#)¹.
3. Do not collect evidence yourself as this could be misconduct or illegal.
4. In your disclosure you could include:
 - the background and reason behind the concern
 - prior attempts to raise the concern (who with and their response)
 - any relevant dates
5. Whistleblowers can raise concerns openly, confidentially or anonymously:
 - (a) **Openly** raising concerns means that the University knows who you are, and they can tell other people you raised concerns. This is often only possible in certain circumstances.
 - (b) **Confidentially** raising concerns means the person to whom you raise your concern knows who you are but maintains confidentiality not to reveal your identity to anyone else, where this is possible. Every effort will be made to keep the identity of the whistleblower confidential for as long as possible during a formal investigation (to the extent that the maintenance of such confidentiality does not hinder or frustrate any investigation). It will not always be possible to maintain absolute confidentiality, for example where referral to external bodies is necessary, but in such circumstances the Designated Officer will seek to maintain individual confidentiality wherever possible.
 - (c) **Anonymously** raising concerns means no one knows who you are. It may not be possible to deal with anonymous disclosures, but this will be determined at the discretion of the Designated Officer, who will have regard to the seriousness of the issue raised, the credibility of the disclosure and the

¹ The remainder of the procedure assumes that it is the Designated Officer who has received the disclosure, and references should be taken to apply to the Chair of the Audit Committee as appropriate.

prospects of being able to properly investigate the matter.

6. Rather than submit an anonymous disclosure, individuals who are concerned about the implications if their identity was to be revealed, are encouraged to approach the Designated Officer directly in confidence so that appropriate measures can be taken to seek to address those concerns.

Stage 2: Initial consideration under the [Whistleblowing Policy](#)

7. 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 Designated Officer 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.
8. The Designated Officer will determine whether or not the matter falls in the scope of the [Whistleblowing Policy](#). Depending on the nature and circumstances of the disclosure, the Designated Officer may:
 - (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) [is determined to be a **qualifying disclosure** and meets the test for **Public Interest**] authorise an internal investigation under the [Whistleblowing Policy](#).
9. In cases where the Designated Officer determines the matter to be out of scope of the Policy, the complainant should 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.
10. The matter may also be referred to the police or other appropriate external authorities (detailed below).

Stage 3: Investigation of a qualifying disclosure

11. The University will promptly investigate any reasonable report of a concern in order to verify facts and ensure fairness. An investigator will be determined by the Designated Officer, who may entrust the investigation to an independent member of staff or persons from outside the University. Where any investigator or person involved in the investigation process has a perceived or actual conflict of interest, this will be managed according to the [Conflicts of Interest Policy](#).
12. All parties, including the whistleblower, must uphold confidentiality during the investigation. If the whistleblower experiences any detrimental treatment for raising concerns, this should be reported to the Designated Officer immediately.
13. 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 some cases the external body's processes may 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 Designated Officer, in consultation with the Vice Chancellor.
14. Where possible, the whistleblower will be kept informed about the progress of any investigation.
15. 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. 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 and remedial action

16. The nominated investigator shall formally report their findings to the Designated Officer as soon as is practical. The Designated Officer will then determine the outcome and any remedial action. If required,

this may include invoking [other University policies or procedures](#) or reference to an appropriate external authority. The Designated Officer will report the outcome to the Vice Chancellor and Audit Committee.

17. On receipt of the outcome report, the Audit Committee may direct the Designated Officer to undertake further investigation. In such cases, the Designated Officer will be required to make a further report to the Vice Chancellor and to the Audit Committee on any subsequent action taken.
18. If appropriate, the Designated Officer may determine that as a result of the findings of an investigation, the matter should also be referred to the University Executive for consideration under the [Reportable Event Procedure](#).
19. A whistleblower does not have a legal right to feedback; however the University recognises the value in communicating actions taken and any steps taken to address concerns. Where appropriate and circumstances allow, the Designated Officer will provide feedback to the whistleblower on the findings of an investigation.
20. While there is no formal appeal stage under the Whistleblowing Policy, if you believe your concern has not been adequately addressed or new evidence arises, you may request a review by the **Designated Officer**. You may also raise your concern with a relevant external regulator if you remain dissatisfied.
21. When the above stages have been exhausted, the matter will be concluded in so far as the University's own procedures are concerned.

Record keeping

22. The University limits the number of people who have access to whistleblowing records and who are subject to strict confidentiality obligations. Access includes: the Designated Officer (Registrar & Secretary / Chair of Audit Committee) and a limited number of staff for administrative purposes. Records will be retained in line with the University's records retention schedule.
23. Additionally, restricted, time-limited access may be granted or information shared as follows:
 - (a) Investigator/s (on a temporary basis to restricted, relevant 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 and these representatives are bound by confidentiality. The Designated Officer is responsible for approving sharing case information with representatives. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.
 - (c) Restricted case files may require immediate referral to an external body.

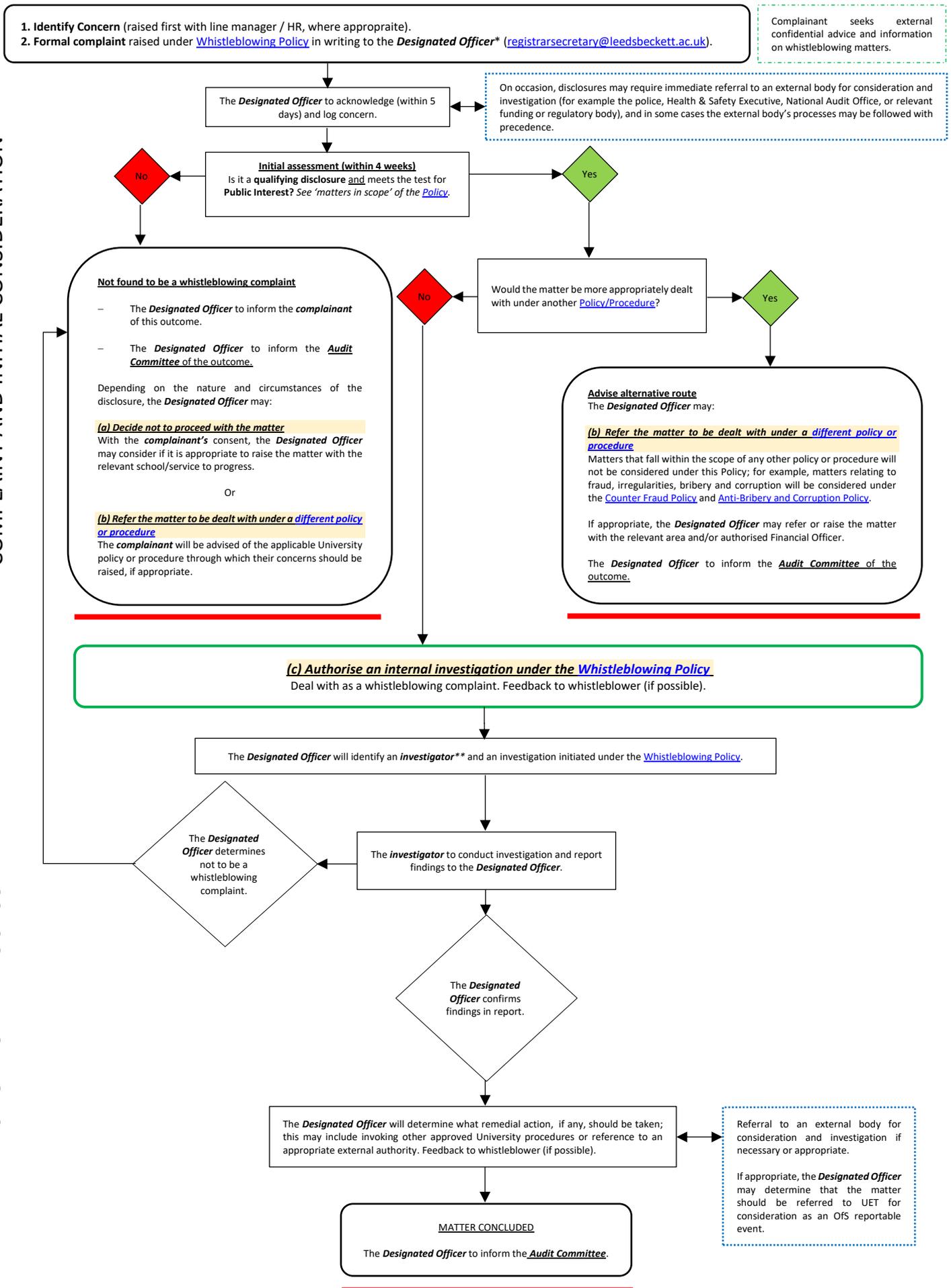
Information Requests and Data Protection

24. 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; and Section 41 Information provided in confidence which, if disclosed, would give rise to an actionable breach of confidence.
25. 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.

Procedure to consider and investigate a Whistleblowing complaint

COMPLAINT AND INITIAL CONSIDERATION

INVESTIGATION AND OUTCOME



* If the disclosure is regarding or implicates the University Registrar & Secretary or Vice Chancellor, then the disclosure should be made to the Chair of Audit Committee. 4 of 5
 ** The Designated Officer may wish to entrust the investigation to an independent person or persons from outside the University.

Examples of Qualifying Disclosures under the Public Interest Disclosure Act 1998:

- 1 - Criminal activity (e.g., the University, or one of its employees has been trying to bribe people);
- 2 - Failure to comply with any legal [or professional] obligation [or regulatory requirements] (e.g., the University has neglected their duty of care to staff or students (including Adults at Risk and Children));
- 3 - Miscarriages of justice (e.g., dismissed for something which turned out to be computer error);
- 4 - Danger to health and safety (e.g., forcing staff to serve contaminated food);
- 5 - Damage to the environment (e.g., malpractice or misuse of hazardous cleaning materials; regularly polluting or exposure to dangerous substances).