

Public Interest Disclosure Policy

1. Introduction

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is subject;

(iii) That a miscarriage of justice has occurred, is occurring, or is likely to occur;

(iv) That the health and safety of any individual has been, is being, or is likely to be jeopardised;

(v) That the environment has been, is being, or is likely to be damaged; and/or

(vi) That information intending to show any matter falling within the above categories has been, is being, or is likely to be deliberately concealed.

3.2 A whistleblower is a person who raises a genuine concern relating to any of the above in paragraph 3.1. If a member of staff (or other worker) has any genuine concerns related to suspected wrongdoing or danger affecting any of the University's activities as set out at paragraph 3.1 above, they should report it under this policy.

3.3 It must also be in the public interest for the disclosure to be a protected disclosure (e.g. seeking through disclosures to advance personal grievances, or actions which could be seen as harassing, bullying or discriminating against a person or persons are not permitted and would not be seen as in the public interest). This policy should not be used for complaints relating to members of staff's own personal

5. Aims of the University Policy

5.1 This policy aims to:

- (i)** Encourage staff (or other workers) to feel confident in raising concerns and to question and act upon concerns about practice;
- (ii)** Provide avenues for staff (or other workers) to raise those concerns and receive feedback on any action taken; and
- (iii)** Reassure staff (or other workers)

(i) call for the matter to be investigated internally;

(ii) refer the matter to the police; and/or

(iii) call for an independent enquiry.

In some cases, a matter disclosed might be dealt with by agreed action and/or preliminary enquiries without the need to instigate an investigation. In determining the above, the Clerk to the Governors (or other investigating officer under this policy) may take such advice or consult with senior colleagues and/or external legal advisors and make such preliminary enquiries as may be necessary.

7.4 If a disclosure is to be referred to the police, the Clerk to the Governors (or other investigating officer under this policy) may take such advice or consult with senior colleagues and/or external legal advisors and make such preliminary enquiries as may be necessary.

8.6 The University will aim to keep the person making the disclosure informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the University from giving the person making the disclosure specific details of the investigation, an outcome or any disciplinary action taken as a result. The person making the disclosure should treat any information about the investigation as confidential.

9. Subsequent action

Upon completion of an investigation (however conducted), a written report will be submitted by the Clerk to the Governors (or other investigating officer under this policy) to the Vice Chancellor (or if the Vice Chancellor is the subject of the disclosure then to the Chair of Governors or if both are involved to the Chair of Audit) who will determine what action, if any, should be taken in the circumstances. This t(i)3.1 (nt Td()Tj2ak)-6

petty, frivolous or vexatious concerns or to address issues which could more effectively be addressed by informal discussion or through formal procedures already in existence or as a means of seeking to instigate an investigation without furnishing appropriate evidence to support those concerns raised. To the extent that the policy exists for their protection, members of staff (or other workers) are requested to use it in a responsible manner for appropriate concerns.

12.2 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases members of staff (or other workers) should not find it necessary to alert anyone externally.

12.3 The law recognises that in some circumstances it may be appropriate for a member of staff (or other worker) to report their concerns to an external body such as a regulator. It will rarely ever be appropriate to alert the media. The University strongly encourages the member of staff (or other worker) to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

1 **12.4** Whistleblowing concerns (usually relating to the actions of a third party, such as a service provider. In some circumstances, the law will protect a member of staff (or other worker) if they raise the matter with the third party directly. However, the University encourages members of staff to report such concerns internally first, in line with the policy.

Consultation history (individuals/group consulted and dates)	
Document History (e.g. rationale for and dates of previous amendments)	Replaces previous policy (January 2019)

14. Contacts

Registrar & Clerk to the Governors	Dr Sue Duncan s.duncan@bolton.ac.uk
Chair of the Audit Committee	Dr Harni Bharaj Vice Chancellor's Office University of Bolton
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 Email: info@protect-advice.org.uk Website: https://protect-advice.org.uk/contact-protect-advice-line/