Raising Concerns (Whistleblowing) Policy

Date: June 2026

Review Date: June 2029

Policy Information	
Policy Title	Raising Concerns (Whistleblowing) Policy
Policy Number:	POL 021
Version	6.0
Policy Sponsor	Chief Executive
Policy Owner	Director of Business Support
Committee and date recommended for approval	Audit and Risk Assurance Committee 17 June 2026
Date approved by the Board	2 July 2026
Equality Screening Status	Screening Reviewed: May 2026
Rural Needs Impact Assessment Status	Assessment Reviewed: May 2026
Date Set for Review	June 2029
Related Policies	Anti-Fraud Policy Anti-Bribery Policy Conflicts of Interest Policy Gifts and Hospitality Policy Data Protection Policy Code of Conduct for Staff

Libraries NI

Raising a Concern (Whistleblowing) Policy

1. Introduction

1.1 The Public Interest Disclosure (Northern Ireland) Order 1998[1], is legislation which provides protection for employees who make certain disclosures of information in the public interest. This is often referred to as whistleblowing or raising a concern.

1.2 Libraries NI is committed to the highest possible standards of ethical behaviour, openness and accountability in the delivery of its services and has a zero tolerance towards any form of wrongdoing. The Code of Conduct requires that staff carry out their duties with honesty, integrity and according to the law.

1.3 We welcome concerns being raised as this provides an opportunity to learn and put things right. This Policy and associated guidance seek to reassure staff that it is safe and acceptable to speak up and provide assistance to anyone who wishes to raise a concern.

2. Purpose

2.1 The purpose of this Policy is to:

- encourage staff and other individuals who have a concern about actual, potential or suspected malpractice or wrongdoing to raise that concern openly and at an early stage so that it can be dealt with in an appropriate and timely manner
- reassure staff and others that it is safe and acceptable to speak up if they have a concern about some actual or potential malpractice or wrongdoing and that any information regarding potential wrongdoing is valued
- confirm Libraries NI's commitment to taking the necessary action, properly and promptly, to address any genuine concern.

---

[1] *A Guide to the Public Interest Disclosure (NI) Order 1998 (as amended) is available on the Department for the Economy website at https://www.economy-ni.gov.uk/publications/public-interest-disclosure-guidance*

3. Policy

3.1 Libraries NI is committed to a transparent, supportive and ethical culture, where members of staff feel confident to raise genuine concerns openly in the knowledge that such concerns will be taken seriously and investigated appropriately.

3.2 Any member of staff who so wishes may raise their concerns in confidence and their identity will not be disclosed without their consent, unless required by law.

3.3 Any member of staff, who raises a genuine concern in good faith, whether or not that concern is eventually determined to be unfounded, will not suffer detriment for having raised that concern. If the person who raises the concern is not an employee Libraries NI will do what is in its power to ensure that he / she does not suffer any form of retribution for raising concerns. Appropriate and swift actions will be taken against employees who victimise individuals raising genuine concerns in good faith.

3.4 This assurance does not extend to someone who maliciously raises a matter they know to be untrue. Libraries NI will regard such allegations as a serious matter, potential misconduct which could result in disciplinary action.

3.5 Any member of staff who wishes to raise a concern may do so, either internally, using the relevant procedures or, externally, with a prescribed person[2].

3.6 All concerns will be investigated thoroughly and in a timely manner by someone suitably skilled and experienced, whether they are raised directly with Libraries NI or through a third party.

3.7 The Sponsoring Department, the Chairperson of the Board and the Chairperson of the Audit and Risk Assurance Committee will be informed about any whistleblowing concerns.

3.8 The Director of Business Support, in consultation with the Chief Executive, and the Department for Communities (DfC) Head of Governance, will determine the approach to be taken to addressing a concern raised under the Raising Concerns (Whistleblowing) arrangements. If necessary, advice will be taken from a relevant prescribed person. Where the whistleblowing concerns relate to a member of the Senior Management Team or a Board Member the sponsoring Department will assume ownership of the investigation, in consultation with the Audit and Risk Assurance Committee and / or the Board of Libraries NI.

[2] *A list of prescribed persons is included as Appendix 1 of the Guide to the Public Interest Disclosure (NI) Order 1998 as amended*

3.9 Appropriate protocols and timescales will be established for maintaining contact with the whistleblower throughout the course of the investigation and for reporting back to him / her on how their concerns have been dealt with / progressed. As far as possible the outcome of the investigation and, where appropriate, any action being taken as a result of it, will be reported back to the individual who raised the concern.

4. Authority

Policy Sponsor:
The Chief Executive has overall responsibility for the Raising Concerns (Whistleblowing) Policy.

Policy Owner:
The Director of Business Support is responsible for ensuring the effective operation of the Policy and associated guidance and for its regular review.

Policy Contact:
Any member of staff who requires further information about the Raising Concerns (Whistleblowing) Policy should contact the Head of Internal Audit.

5. Related Documents

- Grievance procedure
- Anti-Fraud Policy
- Fraud Response Plan
- Anti-Bribery Policy
- Code of Conduct for Staff
- Conflicts of Interest Policy

5.1 This policy and the associated guidance (Whistleblowing: Raising a Concern) has been developed to meet best practice, taking account of:

- DAO (DFP) 02/15: Whistleblowing Arrangements in Annual report and Accounts - Guidance
- Raising Concerns: A good practice guide for the Northern Ireland Public Sector, Northern Ireland Audit Office, June 2020