

Raising a Concern Policy & Procedures

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Alternative Formats

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E-mail: info@probation-ni.gov.uk

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1. Background

- 1.1 The Probation Board for Northern Ireland (PBNI) is committed to the highest possible standards in the delivery of its functions and services. When concerns arise, it is important that PBNI responds appropriately, correcting failures and learning lessons.
- 1.2 This Policy is endorsed and supported at the most senior levels of the organisation and ties into our organisational values of openness and respect as well as the trauma informed principles we adhere to, particularly 'safety'. Board members and senior managers are committed to building a culture where everyone feels valued and safe to speak up about concerns. This policy plays a central role in developing that open, transparent, respectful and safe culture.
- 1.3 Raising a concern in the public interest is the action of telling someone in authority about wrongdoing, risk or malpractice. This policy has been developed in line with Northern Ireland Audit Office Raising Concerns. A good Practice Guide for Public Sector Organisations NI Audit Office Good Practice Guide - Raising Concerns.pdf published in March 2026.

2. Purpose

- 2.1 The purpose of this Policy Framework is to explain how PBNI will handle any concerns raised, and to encourage and provide reassurance to members of the public and staff who want to raise concerns. PBNI encourages people to raise concerns because that way it can, if necessary, put things right; the person raising a concern has performed an act of public service.
- 2.2 This Policy Framework sets out what we mean by 'concerns', and how different kinds of concerns will be dealt with.

3. Policy Objective

- 3.1 To have in place relevant arrangements to safely raise concerns about malpractice and to build confidence and encourage a culture of openness and transparency.

4. Policy Outcome

- 4.1 All those who engage with PBNI are fully informed about raising concerns about malpractice and are able to do so without impediment.

5. Policy Statement and Principles

- 5.1 PBNI actively encourages all who engage with the organisation to raise concerns and will not tolerate the victimisation of anyone who raises a concern and espouses the following principles:
- PBNI will promote an open and supportive culture that values raising concerns.
 - PBNI will have clear and accessible policies to deal with raising concerns.
 - PBNI will ensure confidentiality and protection against victimisation.
 - PBNI will investigate concerns promptly, fairly, and transparently.
 - PBNI will monitor, review and learn from raising concerns.
 - PBNI will ensure there is appropriate oversight of raising concerns.

6. Linkages

- 6.1 This policy links to:
Dignity at Work Policy

Disciplinary Policy

Grievance Policy

Anti-Fraud Policy

Complaints Policy

7. Complaints

- 7.1 Any complaint relating to the operation of this policy will be dealt with in accordance with PBNl's Grievance Policy and Procedures or through the Complaints Policy.

8. Policy Review

- 8.1. This policy will be reviewed four years from the date of approval. Interim reviews may also be prompted by feedback, challenge or identified best practice. The policy has been developed following internal and external consultation.
- 8.2. On an annual basis the senior management team and ARAC should consider the operation of this policy and the checklist for organisations at appendix 2, designed to support the organisation in assessing and enhancing current culture and practices around raising concerns provided by NIAO.

9. Training and awareness raising

- 9.1. Awareness raising in respect of this policy will be provided particularly to middle managers. Staff who have any questions or concerns about how this policy operates should speak to the Head of Compliance.

PBNI RAISING A CONCERN PROCEDURES

10. Introduction

- 10.1 The Probation Board for Northern Ireland (PBNI) is committed to achieving the highest possible standards of quality, honesty, openness and accountability in all of its practices. It wants to foster a culture where people can speak up about concerns in a safe way in line with our commitment to trauma informed principles. These arrangements have been introduced to help you raise a concern you may have about wrongdoing or malpractice.

11. What is 'raising a concern'?

- 11.1 Raising a concern in the public interest is the action of telling someone in authority either internally or externally about wrongdoing, risk or malpractice.
- 11.2 The term 'whistleblowing' does not exist in law. It is a word that has become commonly associated with the action of raising a concern, usually by an employee or worker, about what they believe is wrongdoing within their organisation. However, the term 'whistleblowing' can have negative connotations and can contribute to some of the barriers that prevent concerns being raised.
- 11.3 Concerns raised provide public bodies with an important source of information that may highlight serious risks, potential fraud or corruption. Workers are often best placed to identify deficiencies and problems before any damage is done, so the importance of their role as the 'eyes and ears' of organisations cannot be overstated.
- 11.4 Raising a concern under this policy framework is drawing attention to something going wrong in or by PBNI. This might include issues such as:

- Errors in the implementation or operation of policies and processes.
- Health and safety risks, either to the public or other employees.
- Any unlawful act (e.g., theft).
- The unauthorised use of public funds (e.g., expenditure for improper purpose).
- Maladministration (e.g., not adhering to procedures, negligence).
- Failing to safeguard personal and/or sensitive information (data protection).
- Damage to the environment (e.g., pollution).
- Fraud and corruption (e.g., to give or receive any gift/reward as a bribe).
- The abuse of children and/or vulnerable adults (physical or psychological).
- Any deliberate concealment of information tending to show any of the above.

11.5 This is not an exhaustive list but is intended to illustrate the sort of issues that may be raised and dealt with under this policy.

11.6 Many, if not most, of these could potentially constitute a breach of the PBNI Code of Conduct and this policy framework ought to be read alongside that Code.

11.7 If a concern is about possible fraud, reference should be made as soon as possible to PBNI's Anti-Fraud and Anti Bribery.

11.8 There are protections for workers who raise a concern of a kind that would be counted as a 'protections disclosure'. What this means in

plain English is if you report something seriously wrong, in the right way, the law says you shouldn't be punished for it. The legal definition of a protected disclosure is: "Disclosure of information which, in the reasonable belief of the worker making the disclosure, is made in the public interest and tends to show one or more of the following:

- That a criminal offence has been committed, is being committed or is likely to be committed.
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- That a miscarriage of justice has occurred, is occurring or is likely to occur.
- That the health or safety of any individual has been, is being or is likely to be endangered.
- That the environment has been, is being or is likely to be damaged.
- That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed."

11.9 We would prefer that you raise any concern about malpractice or wrongdoing at an early stage when it is just a concern, rather than wait for proof.

12. What is not a 'concern' under this policy?

12.1 Not all criticism of the work of PBNi will be treated as a concern, and we will need to determine whether an issue raised with them should be addressed as such.

12.2 Separate arrangements exist to deal with complaints and are set out in PBNi's Complaints Procedure. As a general rule, a person making a complaint will be referring to their own case and/or will have some personal interest in the issue, whereas a person raising a concern

dose so in the public interest.

- 12.3 A concern is also distinct from a grievance, which is when an employee raises issues about an employment-related matter. If a member of staff wishes to raise an issue about their employment or how they have been treated, they should use the PBNi Grievance Policy or Dignity at Work Policy.

13. Concern, Grievance or Complaint?

- 13.1 The nature of the issue being raised will determine whether it is a concern, a grievance or a complaint, and therefore the appropriate policy under which it should be addressed.
- 13.2 **A Concern:** When someone raises a concern, the person raising the concern is usually not directly or personally affected, they are simply trying to alert others who can address the issue. For this reason, they should not be expected to prove the malpractice. Such concerns should be handled in line with an organisation's raising concerns policy. A concern may be raised by someone internal to the organisation, generally a member of staff, or by someone external to the organisation.
- 13.3 **A Grievance:** When a worker in an organisation raises a grievance, they are saying that they personally have been treated poorly. This may involve, for example, a breach of their individual employment rights, and the person is seeking redress or justice for themselves. They therefore have a vested interest in the outcome and, for this reason, are expected to prove their case. Such issues should be handled in line with an organisation's grievance policy.

- 13.4 **A Complaint:** A customer or service user may complain about a service provided to them. They will have been personally affected by poor service and will be seeking some form of redress. Such issues should be handled in line with an organisation's complaints policy.
- 13.5 See Appendix 1 on page 13 of this document for a diagram from Northern Ireland Audit Office (NIAO) summarising how to identify the relevant policy to use.
- 13.6 Staff who are dealing with a matter relating to the Raising a Concern Policy should inform the Compliance Unit in the Communications Team who will keep a central log of all relevant incidents. This log will be anonymised where appropriate and held securely.

14. Your safety – Our assurance to you

- 14.1 If a PBNI member of staff raises a genuine concern under these procedures, they will not be at risk of losing their job or suffering any form of detriment as a result of doing so. Although they are not expected to prove the truth of an allegation, they need to demonstrate they have a reasonable belief or genuine concern. However, should they raise a matter that they know to be untrue with malicious intent, then this will be regarded as a serious matter, which could result in disciplinary action
- 14.2 PBNI will not tolerate the harassment or victimisation of anyone who raises a concern under this policy.
- 14.3 We will consider the following as disciplinary offences related to this policy:
- Deterring anyone from using this policy.

- Subjecting the person raising concerns to a detriment, to bullying, to isolation or victimisation.
- Maliciously raising untrue concerns that are known to be false.

15. Confidentiality and Anonymity

- 15.1 With these assurances, it is hoped that individuals will raise their concerns openly. If someone wishes to raise concerns confidentially, either from the outset or at any stage during the process, PBNI will do all they can to ensure that is possible. There may be circumstances where an individual's identity cannot be kept confidential (for instance, PBNI is required to disclose it by law, to the police for example, or if the nature of the concern makes it apparent who has raised it).
- 15.2 If such a situation arises where confidentiality may not be maintained, then we will discuss this with the person. In such circumstances, we will consult with you to seek your informed consent to progress the case.
- 15.3 Individuals can choose to raise their concern anonymously, without giving anyone their name. Concerns raised anonymously will be considered in the same way as any other concern. Anyone considering raising concerns anonymously needs to be mindful that, if they cannot be contacted for further information or clarification, investigation of their concerns may be difficult or even impossible. There is also a chance the documents or information provided might, unknown to PBNI, reveal the identity of the person raising a concern.
- 15.4 Access to information and documentation relating to the concern will be restricted in order to protect the identity of all those involved, including those against whom allegations are made. All personal information must be handled in line with the UK-GDPR requirements.

When dealing with a concern it is essential that all relevant notes and documentation are kept for the record and are held in line with PBNI's Records Management Guidance and Procedures.

16. Independent advice

16.1 If you are unsure whether or how to raise a concern, or you want confidential advice at any stage, you may contact the independent whistleblowing charity Protect on 020 3117 2520 or **fill out the contact form** on their website [Contact Our Advisors \(tfaforms.net\)](https://tfaforms.net). Protect staff can discuss your options and help you raise a concern. For more information, you can visit their website at www.protect-advice.org.uk. Alternatively, you could contact the appropriate regulator such as the Northern Ireland Audit Office or the Health and Safety Executive of Northern Ireland.

16.2 Throughout this process staff can also avail of support through Lena by Inspire.

17. How to Raise a Concern if you are a member of staff

17.1 Please remember that you do not need to have firm evidence of wrongdoing before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

17.2 Raising a concern can be done in the following ways:

- Openly – this is where the identity of the individual raising the concern and the details of the concern can be made known to colleagues.

- In Confidence – this is where the identity of the individual raising the concern and the details of the concern is kept confidential from their colleagues.
- Anonymously – this is where the identity of the individual raising a concern is not known.

17.3 These are the steps that a member of PBNI staff can take when raising a concern:

Step One: Manager

We hope that you will feel able to first raise your concern openly with your manager. This may be done orally or, if you prefer, in writing. Staff are not required to raise concerns with their manager however if uncomfortable.

Step Two: Board Secretary

If you feel unable to raise the matter with your manager for whatever reason, or if you think the concern has not been properly addressed at step one, please raise it with the Board Secretary whose contact details are:

Board Secretary PBNI

Headquarters 80-90 North Street

Belfast BT1 1LD

The Board Secretary will, if the matter is deemed sufficiently serious, take it directly to Step Three. If the Board Secretary is dealing with the matter themselves, he/she will acknowledge receipt of your concern as soon as practicable and preferably within two working days. He/she will assess it and consider what action will be appropriate. This may involve initiating an informal review, an internal inquiry or a more formal investigation under the relevant Board policies and procedures.

Step Three: Chief Executive/Chair of the Board

If you perceive that the matter cannot be dealt with through Steps One or Two, then please raise it with the Chief Executive. If you believe that there is a conflict of interest in Chief Executive dealing with the matter, you may send it to the Chair of the Board.

Chief Executive PBNi Headquarters 80-90 North Street Belfast BT1 1LD 028 90522522	Chair of the Board PBNi Headquarters 80-90 North Street Belfast BT1 1LD 028 90522522
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If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made. If you need support to raise a concern including reasonable adjustments, please let us know.

Step Four: Department of Justice

PBNi recognises its accountability to the Department of Justice. If you feel unable to raise your concern using the steps above or feel that your concern was not properly dealt with, you may raise it with the Director of Safer Communities in the Department of Justice:

Director of Safer Communities

Castle Buildings

Belfast BT4

18. Actions taken once a staff member raises a concern

- 18.1 Once you have told either your manager, Board Secretary, Chief Executive or Chair of the Board of your concern, they will acknowledge receipt of your concern as soon as practicable and preferably within two working days. They will assess it and consider what action may be appropriate. This may involve initiating an informal review, an internal inquiry or a more formal investigation under the relevant Board policies and procedures. Any investigation will be carried out in a timely manner within agreed timescales.
- 18.2 You will be informed as to who will be handling the matter, how you can contact them, and what further information or assistance they may need from you. They will write to you summarising your concern and setting out how they propose to handle your concerns. If they have misunderstood the concern or there is any information missing, please let them know.
- 18.3 When you raise the concern, it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, please say at the outset.
- 18.4 Whenever possible, you will receive feedback on the outcome of any investigation. If required, the response will be confirmed in writing. Please note, however, that whoever is handling your concern may not be able to tell you about disciplinary, or other action, when this would infringe a duty of confidence owed to another person.
- 18.5 If at any stage you experience reprisal, detriment, harassment or victimisation for raising a genuine concern, please contact whoever you raised your concern with or Human Resources. You may also wish to seek independent advice.

19. Raising a concern if you are a service user or member of the public

- 19.1 A member of the public can raise concerns directly with any public sector organisation including PBNI. A member of the public can raise the same types of concerns as an employee or worker.
- 19.2 Please remember that you do not need to have firm evidence of wrongdoing before raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.
- 19.3 Raising a concern can be done in the following ways:
- Openly – this is where the identity of the individual raising the concern and the details of the concern can be made known to staff.
 - In Confidence – this is where the identity of the individual raising the concern and the details of the concern is kept confidential from staff.
 - Anonymously – this is where the identity of the individual raising a concern is not known.

These are the steps that a service user or member of the public should take when raising a concern:

Step One:

- If a service user or member of the public wishes to raise a concern they should do it by contacting the PBNI Raising a Concern Champion by phone 028 90522522 or email Gail.McGreevy@probation-ni.gov.uk. The Raising a Concern Champion (who is also PBNI Complaints Officer) will review the concern and will acknowledge receipt of your concern as soon as practicable and preferably within two working days. The Raising

a Concern Champion will then ensure the concern is directed to the most appropriate senior manager in the organisation for proper consideration and appropriate action. Appropriate action may include initiating an informal review, an internal inquiry or a more formal investigation under the relevant Board policies and procedures.

Step Two:

- A member of the public also has the option of raising their concern with an independent body, such as the Northern Ireland Audit Office or the Northern Ireland Public Services Ombudsman.
- If you need support to raise a concern including reasonable adjustments due to disability or interpretative services, please let us know.

20. Actions taken once a service user/member of the public raises a concern

- 20.1 The Raising a Concern Champion will have the authority, where necessary, and if deemed sufficiently serious, to escalate concerns directly to the Chief Executive. If there is a conflict of interest in the Chief Executive dealing with the matter it may be sent to the Chair of the Board.
- 20.2 On receipt of your concern the Raising a Concern Champion will assess it and consider what action may be appropriate. This may involve initiating an informal review, an internal inquiry or a more formal investigation under the relevant Board policies and procedures. Any investigation will be carried out in a timely manner with agreed timescales.
- 20.3 You will be informed as to who will be handling the matter, how you can contact them, and what further information or assistance they may need from you. They will write to you summarising your concern and setting out how they propose to handle your concerns. If they have misunderstood the

concern or there is any information missing, please let them know.

20.4 When you raise the concern, it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, please say at the outset.

20.5 Whenever possible, you will receive feedback on the outcome of any investigation. If required, the response will be confirmed in writing. Please note, however, that whoever is handling your concern may not be able to tell you about disciplinary, or other action, when this would infringe a duty of confidence owed to another person.

21. Independent Advice

21.1 If anyone using this policy is unsure whether to use it or wants independent advice at any stage, please contact:

- Your union, if applicable (ie if you are a staff member)
- Your solicitor, if applicable.
- The independent charity Protect-Advice either by telephone on 020 3117 2520, or by completing the advice form <https://protect-advice.org.uk/contact-protect-advice-line/> . Their advice team can talk you through your options and help you raise a concern about malpractice at work.
- The Labour Relations Agency either by telephone on 028 90321442, or by email at info@lra.org.uk
- The Citizen's Advice Bureau either by telephone on 028 9023 1120, or by email at info@citizensadvice.co.uk.

22. External Contacts

22.1 While we hope this policy gives you the reassurance you need to raise

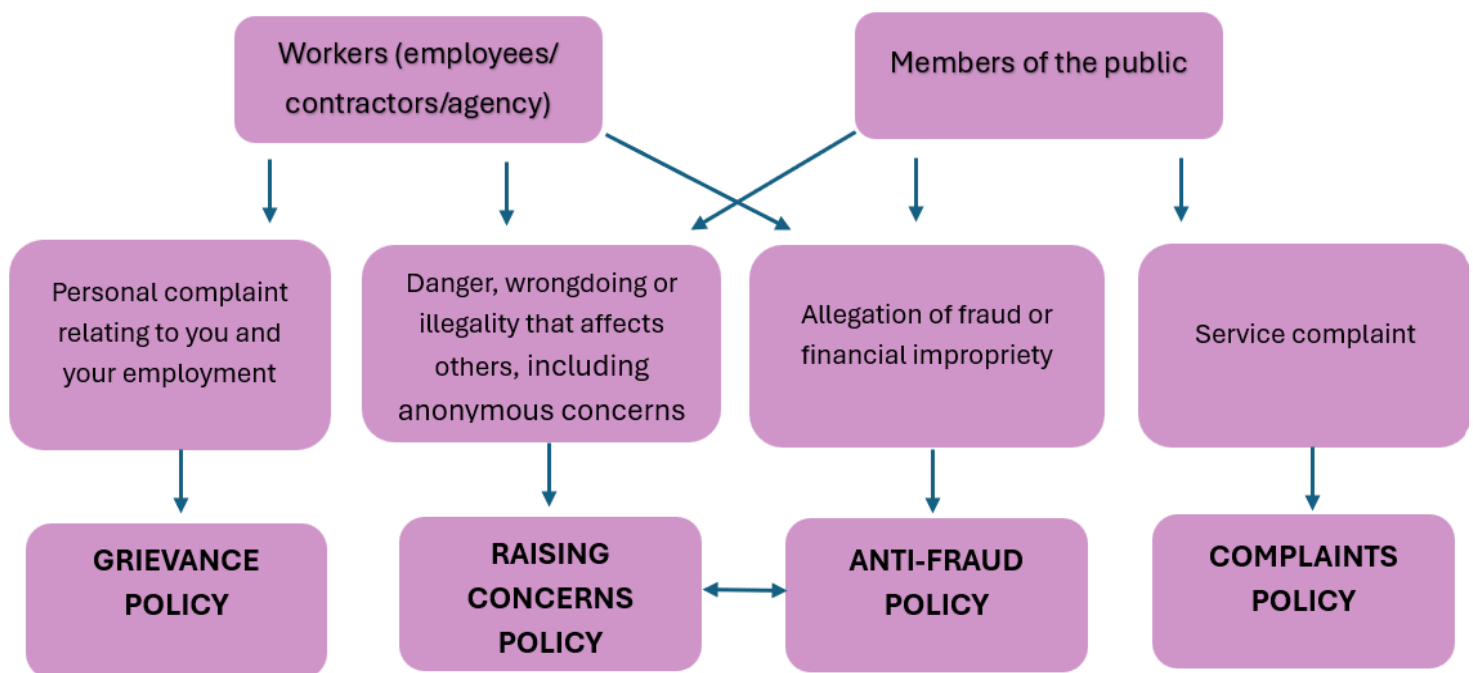
a concern, we recognise that there may be circumstances where you can properly report matters to outside bodies, such as regulators (i.e. the Health and Safety Executive for Northern Ireland, Northern Ireland Audit Office or Northern Ireland Public Services Ombudsman) or the police. Protect-Advice (or, if applicable, your union) will be able to advise you on such an option and on the circumstances in which you may be able to contact an outside body safely.

23. Learning

23.1 Learning outcomes from concerns will inform organisational improvements. SLT and ARAC will be updated quarterly on all concerns raised and actions taken as a result.

Appendix 1

Figure 1 summarises the types of issues that may be raised and the relevant PBNI policies which should apply. The diagram has been included in the Northern Ireland Audit Office Raising Concerns: A Good Practice Guide for the Public Sector:



Appendix 2

Appendix 2: Good practice self-assessment checklist

Good Practice statement:	Yes ✓	Evidence:	No ✓	Action required:
Public bodies should promote an open and supportive culture that values raising concerns				
This organisation has an open and transparent culture which encourages the raising of concerns.				
There is clear and explicit management commitment from the top of the organisation to an open and honest culture.				
This organisation recognises the benefits of hearing about concerns so that they can be properly considered.				
Senior managers and Board members are visible across the organisation and clearly demonstrate the importance and value they attach to hearing from people at all levels.				
There is a code of conduct in place that reinforces the expectation of ethical behaviour from workers at all levels of the organisation.				
There is continuing communication of this organisation's commitment to an open and ethical culture, through circulars, posters, emails and the intranet.				
Public bodies should have clear and accessible				

Good Practice statement:	Yes ✓	Evidence:	No ✓	Action required:
policies to deal with raising concerns				
This organisation has a raising concerns policy in place, which includes all the key criteria listed in this Guide.				
All workers are made aware of the policy.				
The policy is readily available to both workers and members of the public. This is normally done by publishing on the organisation's website.				
There is effective awareness training for all staff so they know what concerns they can raise and how to raise them.				
Staff awareness of the raising concern policy and its practices is actively monitored and measured.				
Training is provided to all staff on the content of the policy.				
There is a Designated Officer and/or Speak Up Champion with detailed knowledge of raising concerns who can provide advice to management and staff and those external to the organisation.				
The policy sets out clear procedures and lines of reporting for workers wishing to raise concerns, which are well publicised.				
The policy offers alternative ways of raising concerns,				

Good Practice statement:	Yes ✓	Evidence:	No ✓	Action required:
including externally.				
The raising concerns policy directs workers to available sources of support and advice, for example Protect or their union.				
This organisation recognises that there may be validity in a concern raised, regardless of a person's motivation for raising it.				
This organisation encourages all concerns to be raised, no matter how small. How is this done?				
This organisation provides a single point of contact for members of the public wishing to raise public interest concerns. This person has the requisite skills to ensure that concerns are processed effectively.				
This organisation gives proper consideration to public interest concerns raised by the wider public.				
This organisation offers the person raising the concern a meeting to discuss their concern and provide any evidence they may have.				
This organisation ensures that members of the public who raise concerns in the public interest are made aware of alternative points of contact.				
This organisation provides appropriate feedback to third parties who have raised concerns.				
Public bodies should ensure confidentiality and				

Good Practice statement:	Yes ✓	Evidence:	No ✓	Action required:
protection against victimisation				
All practical steps are taken to protect the confidentiality of workers raising concerns. This includes: • ensuring that paper files are properly classified as confidential and held securely, and that electronic files are password protected; • ensuring that the minimum number of people have access to case files; • being discreet about when and where any meetings are held with the individual worker; and • ensuring that confidential case papers are not left on printers or photocopiers.				
The raising concerns policy makes clear that this organisation will not tolerate harassment of anyone raising a concern.				
Public bodies should investigate concerns promptly, fairly and transparently				
There are clear roles and responsibilities in place for handling concerns raised.				
There is sufficient resource capacity to cope with raising concerns and to conduct investigations.				
Staff responsible for managing and handling concerns have received appropriate, regular and extensive specialist training.				
There is effective training for line managers who may				

Good Practice statement:	Yes ✓	Evidence:	No ✓	Action required:
have to deal with concerns raised.				
This organisation has access to trained fraud investigators, should an investigation be required.				
Public bodies should ensure there is appropriate oversight of raising concerns The Audit and Risk Assurance Committee plays an important role in raising concerns in our organisation. The Audit and Risk Assurance Committee should: • Discuss raising concerns as a regular agenda item; • Engage with the organisation's Designated Officer or equivalent; • Be satisfied that organisations have the appropriate capacity and capability to investigate and manage concerns; and • Seek assurance that raising concerns are treated in line with the policy.				
There are regular attitude surveys to determine the level of confidence staff have in arrangements for raising concerns.				
This organisation encourages concerns to be raised as part of normal business, for example at team meetings.				
This organisation focuses on the concern being raised and not on the person raising it.				