

Report to Council/ Committee

Subject: Whistleblowing (Speak Up) Policy and Procedure

Date: 23 June 2026

Author: Deputy Chief Executive and Monitoring Officer

Purpose

To present the Whistleblowing (Speak Up) Policy and Procedure for review and approval by the Audit Committee for referral to Cabinet.

Recommendation(s)

THAT:

1. The Audit Committee reviews and recommends the Whistleblowing (Speak Up) Policy and Procedure for adoption by Cabinet.
2. The Committee notes that the policy provides an updated framework for raising, assessing, handling and reporting serious public-interest concerns connected to the Council.
3. The Audit Committee recommend to Cabinet that authority be delegated to the Deputy Chief Executive and Monitoring Officer, in consultation with the Chief Finance Officer and Section 151 Officer, to make minor amendments to reflect legislative, organisational or operational changes.

1 Background

- 1.1 The Council is committed to the highest standards of integrity, openness, honesty and accountability and wants people to feel safe to speak up where they reasonably believe that wrongdoing, malpractice or a serious risk has occurred, is occurring, or is likely to occur.
- 1.2 The Whistleblowing (Speak Up) Policy and Procedure has been developed to provide a clear and accessible framework for raising concerns in the public interest and for ensuring that concerns are assessed, handled fairly, acted upon promptly and used to support

organisational learning. It has also been updated following recommendations arising from the Internal Audit review in order to strengthen the Council's speak-up arrangements and governance framework.

1.3 The policy reflects:

- the statutory whistleblowing framework under the Employment Rights Act 1996, the Employment Rights Act 2025 as amended to include sexual harassment and the Public Interest Disclosure Act 1998
- current UK Government guidance on whistleblowing and prescribed persons
- CIPFA guidance on good governance and on managing the risk of fraud and corruption
- the Council's commitment to a positive speak-up culture, confidentiality, fair handling and protection from detriment
- clear arrangements for internal and external concerns, including signposting where another process is more appropriate
- the CIPFA Code of Practice on Managing the Risk of Fraud and Corruption
- the Council's zero-tolerance approach to fraud, bribery, corruption and wider economic crime
- the reasonable procedures themes associated with the failure to prevent fraud offence effective from 1 September 2025

1.4 The policy forms part of the Council's wider governance and assurance framework and supports oversight of speak-up culture, whistleblowing activity, organisational learning and the identification of themes, trends and control improvements. It replaces the Council's current Whistleblowing Policy adopted in 2019 and supports the Council's continued improvements to governance arrangements.

2 Proposal

2.1 The Whistleblowing (Speak Up) Policy and Procedure sets out the Council's framework for raising, assessing, handling and responding to serious public-interest concerns connected to the Council's work, services, governance, assets, contracts, partnerships and use of public funds.

2.2 The policy makes clear:

- who can raise a concern, including employees, other workers, councillors, contractors, volunteers, suppliers, members of the public and others connected with the Council
- the types of serious wrongdoing that may be raised under the policy
- the distinction between whistleblowing and other procedures such as grievances, complaints, safeguarding or standards arrangements
- the routes for raising concerns internally and the specific route for members of the public and other external people to raise serious concerns through the Monitoring Officer
- the Council's commitment to confidentiality, fair handling, protection from retaliation and support for whistleblowers
- strong leadership and a clear tone from the top
- fraud risk assessment and proportionate controls
- due diligence, secure systems and effective reporting routes
- monitoring, assurance and regular review through the governance framework

- 2.3 The policy includes arrangements for prompt acknowledgement, initial assessment and triage, taking account of matters such as urgency, safeguarding, financial exposure, fraud risk, reputation and public standing, legal and regulatory issues, potential retaliation, conflicts of interest and whether another route is more appropriate. It also makes clear that concerns should be passed promptly to the appropriate designated officer or team so that independence, confidentiality and evidence can be managed properly.
- 2.4 The Council will respond proportionately to the nature and seriousness of the concern. Depending on the circumstances, action may include immediate risk management steps, fact-finding, internal investigation, referral to Internal Audit, HR, Legal Services, safeguarding leads, the external auditor, the Police or another regulator, or referral to a more appropriate internal procedure. Where concerns involve suspected fraud, corruption, serious financial irregularity or misuse of public money, the Chief Finance Officer and Section 151 Officer should be involved at an early stage.
- 2.5 The policy also strengthens governance and oversight arrangements by providing for secure central record keeping, periodic review of themes, trends and lessons learned, joint strategic oversight by the Monitoring Officer and the Chief Finance Officer and Section 151 Officer, and periodic anonymised reporting to Audit Committee. This supports good

governance, organisational learning, counter-fraud resilience and assurance.

- 2.6 Approval of the policy is required by Cabinet and will provide assurance that the Council has an up-to-date and accessible whistleblowing framework aligned with current legislation, recognised good practice and the Council's wider governance arrangements.

3 Alternative Options

- 3.1 Do nothing and retain the existing arrangements – this is not recommended as it may not reflect current legislation, good practice or the need for a clearly articulated speak-up framework for both internal and external concerns.
- 3.2 Produce a partial update – this has been discounted in favour of a fuller refresh to ensure clarity, consistency and clear routes for triage, handling, feedback, reporting and oversight.

4 Financial Implications

- 4.1 There are no direct additional financial implications arising from approving the revised policy.
- 4.2 Effective whistleblowing arrangements support early identification of fraud risk, governance issues, control weaknesses and misuse of public resources, which can help protect public funds and reduce wider financial exposure.
- 4.3 Any training, awareness or administration requirements arising from the policy will be managed within existing resources.

5 Local Government Reorganisation Implications

- 5.1 The policy provides a clear and consistent framework for speaking up that can support any future local government reorganisation arrangements.
- 5.2 It helps ensure that core principles of openness, accountability, confidentiality and fair handling can be maintained across any future organisational changes.
- 5.3 The approach also supports continuity of governance, reporting and assurance arrangements.

6 Legal Implications

- 6.1 The policy reflects the statutory whistleblowing framework under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation, together with wider governance, employment, safeguarding, fraud and regulatory considerations where relevant. Ultimate approval of the policy must be provided by Cabinet.
- 6.2 It also aligns with current UK Government guidance on whistleblowing and prescribed persons, CIPFA guidance on good governance and on managing the risk of fraud and corruption, relevant internal audit standards and wider public-sector good practice on speak-up culture, confidentiality and organisational learning.
- 6.3 The Deputy Chief Executive and Monitoring Officer have been consulted in the preparation of the policy, alongside the Chief Finance Officer and Section 151 Officer and HR as appropriate.

7 Equalities Implications

- 7.1 There are no direct adverse equalities implications arising from this report. The policy is intended to support an open and accessible speak-up culture and clear reporting routes for both internal and external people raising serious public-interest concerns connected to the Council.
- 7.2 The policy also supports fair handling, confidentiality so far as possible, protection from retaliation and appropriate signposting where another procedure is more suitable.

8 Carbon Reduction/Environmental Sustainability

- 8.1 There are no direct environmental implications arising from this report.

9 Appendices

- 9.1 Appendix 1 - Whistleblowing (Speak Up) Policy and Procedure
Appendix 2 – Equality Impact Assessment

Statutory Officer approval

Approved by:

Date:

On behalf of the Chief Financial Officer

Approved by:

Date:

On behalf of the Monitoring Officer