
Revised Whistleblowing Policy and Procedure

Committee considering report:	Governance Committee
Date of Committee:	16 th July 2024
Portfolio Member:	Councillor Iain Cottingham
Report Author:	Julie Gillhespey (Audit Manager)
Forward Plan Ref:	G4552

1 Purpose of the Report

- 1.1 The Council’s Whistleblowing Policy required updating to reflect change in service ownership from HR to Internal Audit, as well as to include reference to whistleblowing concerns that may be raised external to the Council.
- 1.2 The Terms of Reference for the Governance Committee state the Committee’s role is to have oversight of fraud risk and how it is being managed, this therefore includes review and approval of the Council’s policies and procedures relating to the management of fraud.

2 Recommendation

Governance Committee to discuss and approve the content of the revised policy.

Implication	Commentary
Financial:	None
Human Resource:	None
Legal:	None
Risk Management:	For the policy to be effective, the Council’s approach to risk management needs to continue to develop and strengthen awareness of and response to fraud risks.
Property:	None

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Policy:	None			
	Positive	Neutral	Negative	Commentary
Equalities Impact:				
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?		X		
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?		X		
Environmental Impact:		X		
Health Impact:		X		
ICT Impact:		X		
Digital Services Impact:		X		
Council Strategy Priorities:		X		
Core Business:		X		

Data Impact:		X		
Consultation and Engagement:	Governance and Finance Group.			

3 Executive Summary

- 3.1 The Council’s policy covering Whistleblowing was last reviewed in 2021. It was agreed last year that ownership of the policy would better sit with Internal Audit. The rationale being that Internal Audit were the owning service of other fraud related policies, and the service often responsible for undertaking investigations as a result of a whistleblowing concern being raised.
- 3.2 The focus of the previous version of the policy and procedure was on internally raised whistleblowing issues, it has been identified that the policy would benefit from inclusion of information on how to raise and manage concerns raised externally.
- 3.3 The review also resulted in a streamlining of previous content as there was an element of duplication and lack of clarity around some processes.

4 Supporting Information

Introduction/Background

- 4.1 The Council’s policy covering Whistleblowing was last reviewed in 2021. It was agreed last year that ownership of the policy would better sit within Internal Audit rather than HR, as they are the owning service of other fraud related policies, and the service often responsible for undertaking investigations as a result of a whistleblowing issue being received. Also, Internal Audit provide the Council’s training on fraud awareness and whistleblowing.
- 4.2 A full review of the policy was undertaken to add content on how an external whistleblower can raise concerns with the Council, and guidance for managers on how this should be recorded and managed. New sections relating to this are 1.3 to 1.5 of the policy, as well as new content added to the Whistleblowing Disclosure Form (Appendix A to the Policy).
- 4.3 As part of the review there was a streamlining of content, removal of duplication and adding clarity of stages/processes to assist managers who may be the first point of contact when a concern is raised.

Proposals

- 4.4 Governance Committee review and approve the revised policy and procedure.
- 4.5 We note that the awareness and effectiveness of the policy also requires ongoing internal promotion as part of fraud risk awareness in the Council’s approach to risk

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management. Internal Audit have also hosted annual fraud awareness and whistleblowing training for staff and Members to regularly promote awareness.

5 Other options considered

Not applicable, the revised policy requires discussion/approval.

6 Conclusion

- 6.1 The Council's Whistleblowing Policy has been revised to include reference to issues being raised external to the Council, streamline the overall content, and change ownership for HR to Internal Audit.

7 Appendices

- 7.1 Appendix A – Whistleblowing Policy and Procedure.

Subject to Call-In:

Yes: No:

- The item is due to be referred to Council for final approval
- Delays in implementation could have serious financial implications for the Council
- Delays in implementation could compromise the Council's position
- Considered or reviewed by Overview and Scrutiny Management Committee or associated Task Groups within preceding six months
- Item is Urgent Key Decision
- Report is to note only

Officer details:

Name: Julie Gillhespey
Job Title: Audit Manager
Tel No: 01635 519455
E-mail: julie.gillhespey@westberks.gov.uk
