



REPORT TO: Audit and Corporate Governance
Committee

29 September
2022

LEAD OFFICER: Head of Shared Internal Audit

Whistleblowing Policy

Executive summary

1. Counter fraud policies are part of the Council's internal controls, which contribute to maintaining good governance.

Key Decision

2. This is not a key decision because this is being presented to the Audit and Corporate Governance Committee in accordance with their terms of reference.

Recommendations

3. The committee should review and approve the Whistleblowing Policy.

Reasons for Recommendations

4. Our Whistleblowing Policy supports our Counter Fraud Framework, and we have reviewed this Policy to ensure it is up to date and reflects good professional practice.

Details

Background

5. Guidance and best practice is issued periodically from counter fraud agencies, such as the National Crime Agency, CIPFA, the Cabinet Office and the Whistleblowing charity Protect. We are keen to maintain effective policies, by implementing good practice and controls as they develop.
6. Our Whistleblowing Policy supports our Counter Fraud Framework and was developed in accordance with the Public Interest Disclosure Act 1998.
7. The Policy provides a procedure for employees, councillors, contractors and agency workers to report concerns about wrongdoing, risk or malpractice.

Policy review

8. We have reviewed the Whistleblowing framework, to ensure it continues to meet best practice standards, and the Policy has been updated.
9. The reviewed Policy is appended to this report for approval by the Audit & Corporate Governance Committee.
10. It is important that employees and contractors are aware of this policy, and promotional material will be used to raise awareness.

Summary of updates

11. Below is a summary of changes to our Policy and processes:

Theme	Details
Language	<p>The Policy continues to reflect Public Interest Disclosure Act and has not needed to be changed significantly as that legislation is the same.</p> <p>We have taken the opportunity to reflect the latest terminology and language recommended by the Whistleblowing Charity, Protect, to help make the Policy easy to read and accessible.</p> <p>We have provided clarity on how concerns are handled, and the sharing of data, which helps support good information governance.</p>
Accessibility	<p>The Council has a Whistleblowing telephone hotline and email account to help people report concerns.</p> <p>Reporting concerns can be a complex and daunting process. We have developed an Online Form to help guide people through the process of providing the right information, and this will help us to respond quickly to their concerns.</p>
Engagement	<p>Colleagues work across multiple sites. Further changes to working practices have developed since the pandemic, such as hybrid and increased remote working.</p> <p>We are keen to promote the Policy to all colleagues and are developing a communication program. This includes producing posters for display in sites where colleagues may have limited internet access.</p>

Conclusions

12. The Council remains committed to providing services carried out in accordance with the highest ethical standards and takes steps to proactively prevent fraud and investigates concerns.
13. The review of policies is completed to help embed effective standards for countering fraud and corruption. This supports good governance and demonstrates effective financial stewardship and strong public financial management.
14. As anti-fraud and corruption is part of our governance framework, it is appropriate that the Audit & Corporate Governance committee is responsible for reviewing and approving policies in this area when there has been a significant change or review.

Considerations

15. None.

Options

16. The Committee may wish to comment and suggest amendments to approve the revised Policy.

Implications

17. In the writing of this report, there are no significant implications or risks to the Council. This updates our existing framework to current best practice.

Background Papers

18. None

Appendices

19. Appendices to this report include the draft policy.

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