

Committee: Audit and Standards Committee

Title: Whistleblowing Policy

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Portfolio Holder: Cllr Petrina Lees,
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Summary

1. The Whistleblowing Policy is due for review and this report seeks a recommendation from Audit and Standards Committee to Council to adopt the revised policy.

Recommendations

2. That the content of the report be noted by Committee.
3. That the Committee recommend to Full Council to adopt the updated Whistleblowing Policy in Appendix A

Financial Implications

4. None

Background Papers

5. Appendix A being the tracked version for member information.

Impact

- 6.

Communication/Consultation	None as in compliance with best practice guidance and the Committee's terms of reference.
Community Safety	None
Equalities	In line with the Public Sector Equality Duty, public bodies must, in the exercise of their functions, give due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations

	<p>between those who share a protected characteristic and those who do not.</p> <p>The contents of this report do not directly impact on equality, in that it is not making proposals that will have a direct impact on equality of access or outcomes for diverse groups.</p>
Health and Safety	None
Human Rights/Legal Implications	The Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2025 strengthens the implementation of sanctions by designating additional authorities for whistleblowing disclosures. This includes HM Treasury and the Secretaries of State for Business and Transport
Sustainability	None
Ward-specific impacts	None
Workforce/Workplace	The officer involvement required to comply with these obligations are factored into service plans and work plans.

Situation

7. The policy provides a clear statement of the Council's position that it seeks to conduct all its activities to a high standard and with integrity and transparency.
8. The policy provides the mechanisms for a person with genuine concern or suspicion about council activities to raise the matter in a safe space and have confidence that it will be appropriately considered without fear of reprisal.
9. Effective from 26 June 2025, workers who report sanctions-related misconduct in the UK will benefit from enhanced legal protections under employment law. The UK government has extended the scope of **whistleblower safeguards** to include disclosures concerning breaches of financial, trade, and transport sanctions. This marks a significant development in both employment rights and organisation compliance obligations.
10. These changes come at a time when the UK is intensifying its approach to sanctions compliance, particularly in response to global geopolitical pressures. By strengthening whistleblower protections, the government aims to encourage greater transparency and accountability within organisations and improve

oversight of sanctions enforcement. There is ongoing discussion about establishing a dedicated **Office of the Whistleblower** and introducing financial incentives for disclosures, similar to models used in the United States.

11. The current policy was last updated in 2023.

12. A review of this policy has been carried out as part of the Counter Fraud Strategy.

13. There have been a small number of updates to the Council's Whistleblowing policy which are shown in tracked changes in the attached Appendix A, which is now recommended for adoption.

Risk Analysis

14.

Risk	Likelihood	Impact	Mitigating actions
It is important that the Council continues to highlight the responsibility to adhere to this policy resides at all levels of the council.	2	2	The Council's induction programme includes a module to the Whistleblowing and this policy

1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.