Insert:
Committee – Corporate Governance Committee
16 September 2026

Report by: Head of HR and OD

Lead Cllr:
Portfolio Holder for Workforce

Huntingdonshire
DISTRICT COUNCIL

Wards	Open / Exempt	Key Decision?
All	Open	No

Whistleblowing Policy

Executive Summary:

The revised Whistleblowing Policy strengthens the Council's framework for reporting and investigating concerns about wrongdoing, ensuring alignment with the Public Interest Disclosure Act 1998 and reinforcing the Council's commitment to openness, accountability and ethical governance. The policy clarifies the distinction between whistleblowing and other reporting mechanisms, and provides clear guidance on reporting concerns.

The policy introduces a number of governance enhancements, including stronger protections for whistleblowers, additional safeguards for concerns involving statutory officers through independent external oversight, defined investigation timescales, and enhanced arrangements for fraud referrals and investigations. It also establishes quarterly reporting of whistleblowing activity to the Corporate Governance Committee and ensures that any resulting organisational actions are monitored through Internal Audit follow-up processes. Collectively, these changes support transparency, public confidence and effective organisational governance whilst encouraging the timely reporting and investigation of concerns.

Recommendations

1.1. Corporate Governance Committee are requested to endorse this policy

	Key Corporate Plan Priorities
1	*Doing our Core Work Well*

Report Author(s)

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1. PURPOSE OF THE REPORT

1.1 This report provides a summary the policies that are being submitted for endorsement.

2. BACKGROUND & CONTEXT

2.1 The policies reviewed in this period:

Summary of the changes:

Policy	Amendments
Whistleblowing Policy	Review and update of entire policy, clarification of process, inclusion of timescales, inclusion of Statutory Officer section and clarity of responsibilities. New section on updated fraud legislation

3. ALTERNATIVE OPTIONS CONSIDERED & NOT RECOMMENDED

3.1 N/A.

4. COMMENTS OF OVERVIEW & SCRUTINY

4.1 N/A

5. POST-DECISION IMPLEMENTATION

5.1 Policies endorsed will be reviewed in line with the policy schedule.

6. IMPLICATIONS OF THE DECISION

6.1 Council Key Priorities and Performance

- Improving quality of life for local people
- Creating a better Huntingdonshire for future generations
- Doing our core work well

This policy supports the organisation to ensure that they are legally compliant and have the right processes and procedures in place to support staff to do our core work well and to delivery the Council’s key Priorities.

6.2 Financial Implications

6.3 No additional financial implications identified

6.4 Policy Implications

6.4.1 These have been amended to ensure that they are in line with legislative updates and best practice.

6.5 Legal & Constitutional Implications

6.5.1 These have been amended to ensure that they are in line with legislative updates and best practice.

6.6 Community Impact

6.6.1 Equality Impact Assessment will be carried out following endorsement

6.7 Environment & Climate Change Implications

6.7.1 N/A

6.8 Equality & Diversity Implications

6.8.1 Equality Impact Assessment will be carried out following endorsement

6.9 Implications on Resources

6.9.1 N/A

6.10 Health & Wellbeing Implications

6.10.1 N/A

6.11 Local Government Reorganisation (LGR) Implications

6.11.1 LGR is taken into consideration for all policies that are reviewed or updated in line with legal requirements, and where possible, taking into consideration what neighbouring Council's approaches are.

7. RISK MANAGEMENT

7.1 This policy is designed to mitigate risk to the organisation and to allow consistent application across all service areas.

8. BACKGROUND PAPERS– LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

8.1 N/A.

Whistleblowing Policy

1.2

Version Control			
Version	**Author**	**Date**	**Changes**
1.1	Head of HR	01.09.2026	Review and update of entire policy, clarification of process, inclusion of timescales, inclusion of Statutory Officer section and clarity of responsibilities New section on updated fraud legislation

Name of Policy	Whistleblowing Policy
Person/posts responsible	Head of Internal Audit
Date approved/adopted	September 2026
Approved by	Corporate Governance Committee
Review Date	September 2028

Whistleblowing Policy

1.0 Policy Statement

This Whistleblowing Policy aims to:

- Encourage and enable any person to feel confident in raising serious concerns
- Set out how and to whom serious concerns can be raised
- Provide confidence to whistleblowers that all referrals will be dealt with in line with this policy
- Describe how to take the matter further if dissatisfied with the Council's response
- Reassure anyone making a referral that the Council will take all reasonable and practical steps to protect whistleblowers from reprisals, harassment, or victimisation.

A serious concern will not necessarily always constitute a whistleblowing referral which would be investigated under this policy. For example, there are separate processes to allow employees to lodge a grievance relating to their employment; for customers to complain about the service they receive; or for anyone to raise concerns about whether Members have breached the Member's Code of Conduct.

The Public Interest Disclosure Act 1998, called the "Whistleblowers Act" provides protection for employees who disclose information that might otherwise be regarded as confidential. The Act makes it clear that where the nature of such a disclosure falls into one of seven categories detailed below and the manner of the disclosure is one permitted by the Act; employees will have protection in law from detrimental action by the employer.

The seven categories are:-

- A criminal offence has been, is being, or is about to be committed
- A person is failing to comply with legal obligations
- A miscarriage of justice has happened or is likely to happen
- An individual's health and safety is or could be endangered
- The environment is, or is likely to be damaged
- Sexual harassment has occurred or is likely to occur if it is a criminal offence or a danger to health and safety.
- Information falling into one of the above categories which has been, is being or is likely to be, deliberately concealed

2.0 Scope

2.1 Huntingdonshire District Council (HDC) is committed to the highest possible standards of openness, probity and accountability. In line with that commitment the Council expects employees, councillors, organisational partners, contractors and members of the public to raise concerns about any impropriety or illegality in the Council's work.

2.2 If you are not a Council employee, the Council's Complaints Procedure should be used to raise complaints about Council services and activity via the website (Complaints - Huntingdonshire.gov.uk). Members of the public can contact the Council using the Whistleblowing Policy to report any serious concerns or disclosures over wrongdoing.

Where this policy refers to a "whistleblower", it refers to both employees and members of the public who make a disclosure. Unlike disclosures by employees, PIDA does not offer legal protection for disclosures made by members of the public. However, the Council will take reasonable and appropriate action to investigate appropriate concerns raised and to protect the confidentiality of members of the public when they make a disclosure.

2.3 This policy is not intended to be a substitute for other policies and procedures such as the complaints process or grievance procedures.

In the event a false or malicious concern is raised, the Council may consider taking disciplinary action.

3.0 Policy Objectives

3.1 This policy is intended to deal with serious or sensitive concerns about inappropriate behaviour, in the categories set out at paragraph 1.1 above.

3.2 Beyond the legal categories, the Council would encourage employees, members of the public, and any other interested parties to raise any significant concerns that they may have, as soon as they are reasonably aware of them. These concerns could be about any aspects of the Council's activities, e.g. with reference to Council employees, Members, or suppliers acting on behalf of the Council, and relate to issues that are either occurring now or likely to happen in the future.

There are other policies and procedures which can be relevant, such as the Complaints Policy. Whistleblowing may not be the most effective or appropriate course of action.

4.0 Fraud, Bribery and Corruption

4.1 The Council is committed to preventing, detecting and investigating fraud, corruption, bribery and other financial irregularities. Such matters are regarded as serious wrongdoing and fall within the scope of this Whistleblowing Policy.

4.2 For the purposes of this policy, fraud may include (but is not limited to):

- Theft or misuse of Council funds or assets
- False claims for payments, expenses, grants or benefits
- Procurement or contract fraud
- Bribery or corruption
- Deliberate falsification of records
- Abuse of position for personal gain

4.3 Any concerns or suspicions relating to fraud or financial irregularity should be reported as soon as possible. Concerns may be raised through the whistleblowing routes set out in Section 10

4.4 In addition, the Council has a dedicated Corporate Fraud Team, which is responsible for investigating all allegations of fraud against the Council. Referrals relating to suspected fraud may be directed to this team for assessment and investigation.

4.5 Individuals may report suspected fraud via:

- the whistleblowing routes outlined in this policy ; or
- directly to the Corporate Fraud Team: Report Fraud - Huntingdonshire.gov.uk

4.6 Where a concern relates specifically to fraud, the Council may:

- refer the matter immediately to the Corporate Fraud Team;
- involve Internal Audit as appropriate;
- Refer the matter to external agencies, including the Police, where criminal activity is suspected.

4.7 The Council may also share information with relevant external bodies for the purposes of preventing and detecting fraud, in accordance with legal requirements.

4.8 Individuals reporting fraud concerns under this policy will be afforded the same protections as any other whistleblower in line with the Public Interest Disclosure Act 1998.

5.0 Protection

5.1 In accordance with the Public Interest Disclosure Act 1998, Huntingdonshire District Council undertakes to protect, as best it can, an employee who blows the whistle from personal claims, victimisation, harassment or bullying as a result of their disclosure.

5.2 Any person taking any reprisal or similar action against a whistleblower because they have made a protected disclosure under this policy may be subject to disciplinary or other action by the Council.

5.3 The Council will, at the request of the whistleblower, keep the nature of concerns confidential. It will not reveal names or positions without permission, unless it has to by law, or an enquiry results in a criminal investigation in which the whistleblower might be required as a witness. Whistleblowers should be aware, however, that the fact that enquiries are being made might, of itself, result in their identity becoming known. Where possible, the Council will make a whistleblower aware if their identity is likely to be compromised through investigation.

5.4 All these matters will be explained at the time a concern is raised and the Council will also keep the whistleblower informed if the situation significantly changes.

6.0 Protection for Statutory Officers

6.1 The Council recognises the unique and statutory responsibilities of the Head of Paid Service, Chief Finance Officer (s151 Officer), and Monitoring Officer. To preserve their independence and ensure they can uphold core governance duties without fear of reprisal, the following additional organisational protections apply when they raise, or are the subject of, whistleblowing concerns.

6.2 The Council also has additional safeguards in place when a Statutory Officer is the subject of a Whistleblowing Concern. These additional safeguards include the following:

Mandatory External Oversight of Investigations

Any whistleblowing concern involving a Statutory Officer must:

- Be assessed by the Chief Executive (unless they are the subject), in conjunction with HR, and;
- Be independently reviewed through an **external party** or **mutually agreed partner authority**, with the support of Internal Audit (and where appropriate, HR) ensuring impartiality and public confidence.
- The organisation shall provide appropriate resources and oversight to ensure that it is investigated in a timely manner.

- Where the Chief Executive is the subject of the Whistleblowing allegation, the Executive Leader of the Council will assess the concern, in conjunction with HR in the place of the Chief Executive.

7.0 Anonymous Allegations

7.1 The Council acknowledges that in making a complaint under the Whistleblowing Policy, an individual may not wish to provide their details and thus may wish to remain anonymous. Concerns expressed anonymously will be considered at the discretion of the Council, and in certain cases may not be investigated. In exercising this discretion, the factors to be taken into account would include:

- Seriousness of the issue;
- Credibility of the concern;
- Likelihood of being able to obtain the necessary information to corroborate an allegation

8.0 False, Malicious or Vexatious allegations

8.1 The Council openly encourages whistleblowing done in good faith. Anyone who makes an allegation in good faith, which is not subsequently confirmed by the investigation, will continue to have protection under this policy from victimisation or harassment.

8.2 If a whistleblower makes a deliberately false, malicious or vexatious allegation, the Council will take appropriate disciplinary or legal action against them.

9.0 How to Raise a Concern

9.1 Whistleblowers should not attempt to investigate any concern themselves but raise their concern using one of the avenues shown below.

9.1.1 A Council employee should first raise a concern with their manager. If the concern is not resolved after discussion with their line manager, it should then be put in writing to the Head of Internal Audit.

9.1.2 In some cases, the nature or sensitivity of the concern means that this may not always be appropriate. If you feel you cannot raise their concern with your immediate manager, you may feel a whistleblowing disclosure is the most appropriate option. If you want to make a whistleblowing disclosure or discuss your concerns, you can contact:

- Head of Internal Audit
- Whistleblower@huntingdonshire.gov.uk
- S151 Officer
- Monitoring Officer

- Head of Health and Safety
- External Audit

9.2 Whistleblowers are encouraged to raise concerns promptly in writing, giving as much information as possible, such as relevant background, names, dates, places and the reason for their concern. The earlier a concern is raised, the easier it will be to take effective action.

9.3 A whistleblower will be expected to demonstrate that there are reasonable grounds for voicing their concern. Any whistle blower will be asked to declare any personal interest they may have in the concern being raised.

9.4 The Council has developed procedures as to how whistleblowing concerns will be reviewed and investigated, see appendix A. It is recommended that anyone who raises a concern refers to these to identify the next course of action that will be taken in response to the issue raised.

9.5 In matters concerning the health, safety and welfare of those on our premises (whether members of staff, contractors or visitors) anyone, including an elected safety representative, who becomes aware of a hazard (actual or potential) or dangerous occurrence should immediately notify the Health and Safety Advisor and Chief Executive before contacting any outside body, to ensure that immediate action can be taken if necessary to deal with the hazard. Contact can be made by telephone, email or the sending of a written report as appropriate to the situation.

10.0 Investigation Process

10.1 Once a whistleblowing complaint is received, the complaint will be reviewed and assessed to determine whether it falls under the criteria of Whistleblowing' **within 5 working days of receipt.**

10.2 Once the concerns raised have been understood and captured correctly, the Head of Internal Audit or other officer dealing with it will conduct an initial review to decide:

- Whether the issues raised fall within the Council's remit or powers to investigate. If they do not, the whistleblower will be advised of this (where possible);
- If so, whether the disclosure falls within the scope of the Whistleblowing Policy or would be more appropriately investigated under another policy or procedure. Where relevant, the disclosure will then be referred under the appropriate policy for consideration, and the whistleblower will be advised of this (where possible);
- If the disclosure does fall within the scope of the Whistleblowing Policy, the review will consider whether a full investigation is appropriate, taking into consideration the following:

- Seriousness of the concern: the review will assess if the concern is serious enough to warrant an investigation, taking into account factors such as the risk of harm, legal implications and impact on the organisation, and whether the resources required to conduct an investigation are proportionate to the potential outcomes;
- Feasibility of investigation: the review will assess whether it is possible to investigate the concern based on the information provided, including considering the availability of relevant evidence;
- If a full investigation is required, the review will determine what form it should take and confirm which officer will act as the investigating manager. Dependent on the nature of the concern, investigations may be referred to or carried out in conjunction with relevant directorate.

Further information may be sought from the whistleblower where necessary to assist the investigation. Where any meeting is arranged, whistleblowers have the right to be accompanied by a trade union or professional association representative or a work colleague (who is not implicated in the whistleblowing complaint).

10.3 We will aim to complete the investigation within 20 working days, however this will be dependent on the nature and complexity of the complaint

10.4 Once the investigation has been completed, a draft report will be completed by the Investigating Officer and where relevant will be shared with Internal Audit, and/or the relevant line manager/member of CLT

10.5 Once the investigation has been concluded and the report written, the Head of Internal Audit will confirm this to the person submitting the complaint, providing this was not submitted anonymously. Due to the potential confidential nature of the investigation, no further information will be provided to the person submitting the complaint.

10.6 All whistleblowing will be reported to the Corporate Governance Committee on a quarterly basis

10.7 The roles and responsibilities of those involved are detailed in Appendix A

11.0 Outcome of Whistleblowing Concern

11.1 Where a whistleblowing investigation identifies that any significant organisational action(s) are required, these will be captured in an investigation report, which must be shared with Internal Audit.

Implementation of these actions will then be monitored through the Internal Audit follow up process and reported to Corporate Governance Committee.

The amount of contact between the officers considering the issues and the whistleblower will depend on the nature of the concern, any legal constraints, and the clarity of the information provided.

11.2 The whistleblower will be informed when an investigation has concluded and where possible will be provided with some feedback on the outcome; however it should be noted that this may not always be possible (for example where disclosing the outcome of an investigation would involve sharing an individual's confidential employment information).

11.3 The Council will take appropriate steps to minimise any difficulties which a whistleblower may experience as a result of raising a concern and provide advice and support should they be required to give evidence, e.g., at a disciplinary hearing.

11.4 Whistleblowers who require reasonable adjustments due to a disability, health condition, or other personal circumstances may request these at any stage of the whistleblowing process. Requests will be considered sensitively and, on a case, -by-case basis, and where reasonably practicable, will be accommodated to ensure fair and equitable access to the whistleblowing process.

11.5 There is no right to appeal the outcome of the whistleblowing investigation, unless some new information comes forward at which point the concern can be raised again.

12.0 Raising issues with an external party

12.1 Concerns are most readily addressed where they are raised internally in the first instance. However, there may be situations where you feel it is inappropriate to raise the concern internally, or unable to do so. Alternatively, you may have already raised a concern and are dissatisfied with the outcome. In these situations, there are a number of other parties to whom you may turn:

- Relevant Regulatory Organisations (e.g. the Financial Conduct Authority, Health and Safety Executive or Local Government Ombudsman)
- The Police (where a criminal matter is involved)
- Protect on tel: 0203 117 2520

12.2 Before consulting an external party, the Council recommends that the whistle blower seeks independent legal advice (disclosure to a legal advisor is protected by law). The law most readily protects disclosures that are seen to be "reasonable", i.e. disclosures that are made within the Council, or to an appropriate regulator at an early stage. If the matter is taken outside of the Council, the whistle blower should ensure they do not disclose information about a third party that may be covered by a duty of confidentiality (e.g. commercially sensitive information or personal, private data).

13.0 Withdrawing your Allegation

13.1 You have the right to withdraw any allegation previously made under this policy and procedure. You should think very carefully before taking this course of action, bearing in mind an investigation may have started, and you may need to explain this change of decision. If it considered appropriate, despite the complainant withdrawing the allegation, the investigation of the allegation may continue if it is deemed necessary.

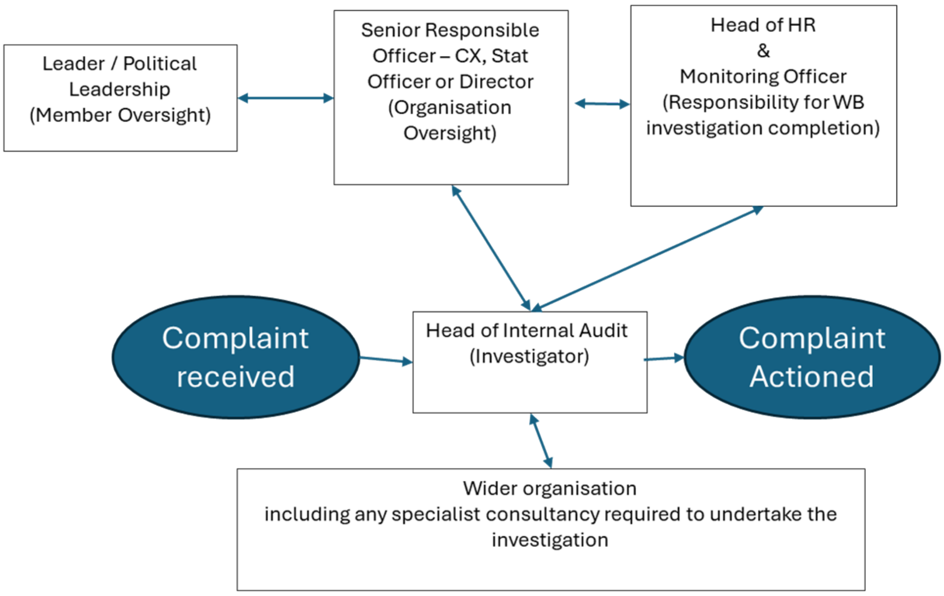
14.0 Advice and Support

14.1 HDC has a duty of care to both employees who are making a complaint under this policy and also to employees who are subject to a complaint. We will endeavour to manage the process and offer support and guidance in a supportive and considerate manner; however, this cannot be guaranteed as it may be influenced by the individual circumstances at play at the time.

14.2 There is support available through an Employee Assistance Programme, (EAP) service to ensure the welfare of an employee is supported in a positive manner. If you need further information on the support services available, please contact your line manager or the HR Team. The details of your referral will remain confidential to the HR Team.

14.3 Should any aspect of the investigation process cause difficulty because of a disability, language barriers or other difficulties, the Council will aim to support with the necessary help or assistance. Please contact your line manager or the HR Team if additional support is required.

Appendix A – Reporting Procedures

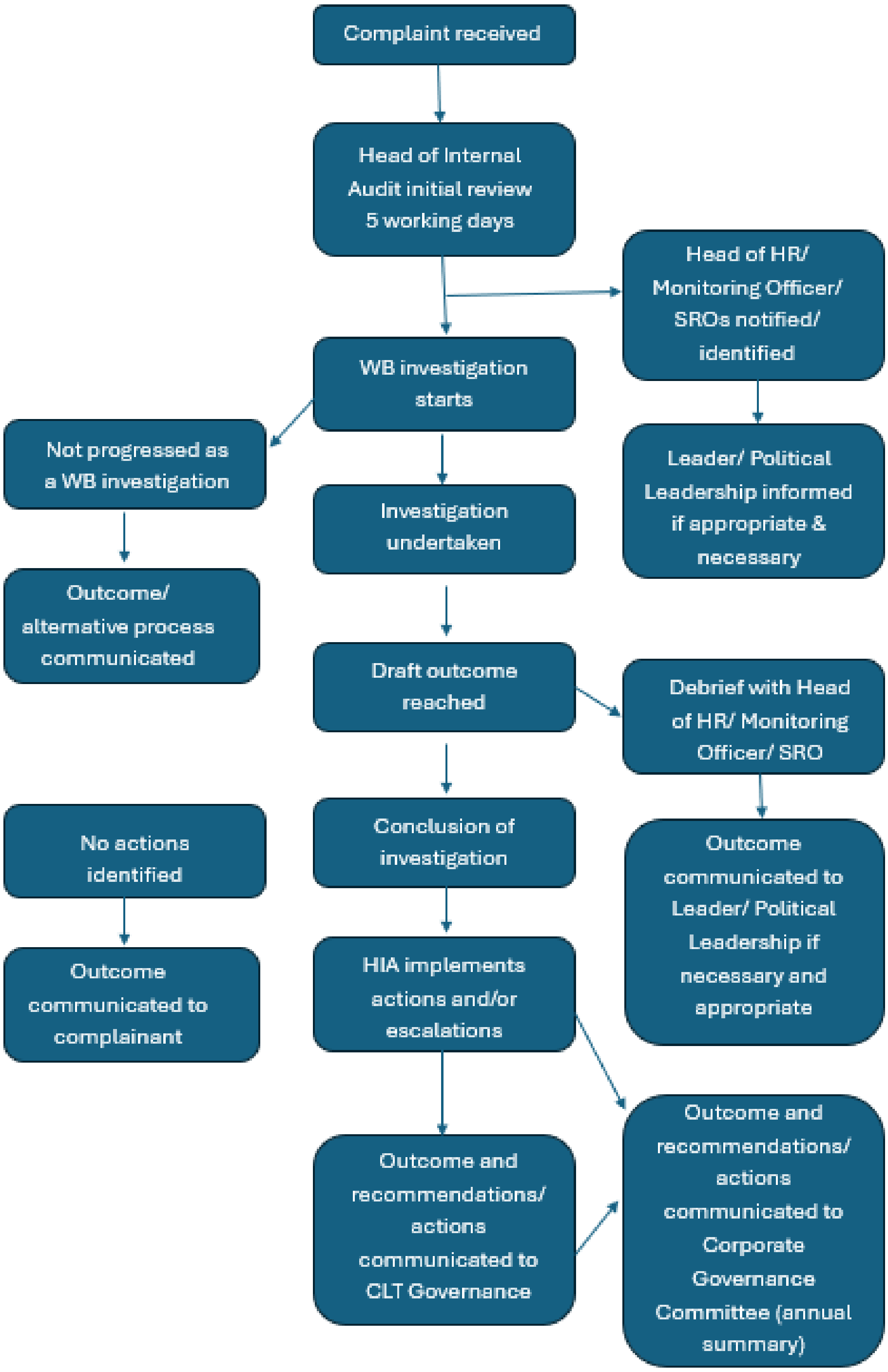


<u>Roles & Responsibilities</u>

Head of Internal Audit – Responsible for receiving, investigating, and actioning (inc establishing recommendation) any complaints received. Where roles/individuals are implicated by the complaint, and may be conflicted, the HIA will work with other Officers in the Corporate Leadership Team to take on roles identified about for the purpose of the complaint.

Head of HR & Monitoring Officer – Responsible for supporting the Head of Internal Audit, enabling enquiries, and providing access to staff, policies, procedures, and legal advice.

Senior Responsible Officer (SRO) – To provide organisational oversight of the processing of the complaint; and be the link with Members (as necessary)


Complaint received
Head of Internal Audit initial review 5 working days
Head of HR/ Monitoring Officer/ SROs notified/ identified
WB investigation starts
Not progressed as a WB investigation
Investigation undertaken
Leader/ Political Leadership informed if appropriate & necessary
Outcome/ alternative process communicated
Draft outcome reached
Debrief with Head of HR/ Monitoring Officer/ SRO
No actions identified
Conclusion of investigation
Outcome communicated to Leader/ Political Leadership if necessary and appropriate
Outcome communicated to complainant
HIA implements actions and/or escalations
Outcome and recommendations/ actions communicated to Corporate Governance Committee (annual summary)
Outcome and recommendations/ actions communicated to CLT Governance