



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

## Governance and Audit Committee

Wednesday, 23 July 2025

Report of Councillor Philip Knowles,  
Cabinet Member for Corporate  
Governance and Licensing

# Reporting Fraud and Whistleblowing Annual Report 2024/25

### Report Author

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### Purpose of Report

One of the key areas for Governance and Audit Committee, as part of its terms of reference, is to monitor and review the arrangements for the reporting of fraud, and whistleblowing, and the action taken as a result of disclosures.

### Recommendations

**That the Committee notes the contents of this report and ensures it obtains the necessary assurance in respect of the fraud and whistleblowing investigations.**

### Decision Information

Does the report contain any exempt or confidential information not for publication?

No

What are the relevant corporate priorities?

Effective council

Which wards are impacted?

All Wards

## **1 Implications**

- 1.1 Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, safeguarding, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

### ***Finance and Procurement***

- 1.2 There are no specific financial implications arising from this report.

Completed by: David Scott – Assistant Director of Finance and Deputy s151 Officer

### ***Legal and Governance***

- 1.3 From a governance perspective, the Governance and Audit Committee should be content with the arrangements the Council has in place to effectively manage and address instances of whistleblowing and fraud that are reported.

Completed by: James Welbourn, Democratic Services Manager

### ***Human Resources***

- 1.4 This report highlights the need for the Council to continue to foster a culture of openness, trust and accountability, where employees feel confident and supported to raise concerns about wrongdoing. Regular training and guidance for employees and managers on whistleblowing is important to include the roles and responsibilities of all parties, and the channels and mechanisms for reporting and escalating concerns.

Completed by: Jane Jenkinson, Senior HR Officer

## **2 Background to the Report**

- 2.1 The Council is committed to the highest standards of quality, probity, openness, and accountability. As part of the Committee's terms of reference, fraud prevention and whistleblowing are key areas of focus being an essential element of delivering good governance.
- 2.2 To develop and promote greater awareness, and in line with best practice, a review of the Council's fraud detection and whistleblowing disclosures has been undertaken, culminating in this Annual Report for 2024/25.

## **3 Whistleblowing**

- 3.1 Whistleblowing is the term used when a worker passes on information concerning wrongdoing i.e. "making a disclosure" or "blowing the whistle". The

wrongdoing will typically, although not necessarily, be something they have witnessed at work.

3.2 To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things:

- That they are acting in the public interest i.e. this means that personal grievances and complaints are not usually covered by whistleblowing law; and
- That they must reasonably believe that the disclosure tends to show past, present, or likely future wrongdoing falling into one or more of the following categories:
  - Criminal offences
  - Failing to comply with a legal obligation
  - Miscarriages of justice
  - Endangering someone's health and safety
  - Damaging the environment
  - Covering up wrongdoing in the above categories

3.3 Whistleblowing law is set out in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or lost their job because they have 'blown the whistle'.

3.4 The Council's [Whistleblowing Policy](#) makes it clear that all concerns raised about actual or potential misconduct, or wrongdoing in the Council, are taken seriously.

3.5 Within the definition of whistleblowing, no issues have been raised during 2024/25.

## 4 Reporting fraud

4.1 Fraud has been committed when someone does not tell the Council the truth about their circumstances, falsifies documentation for personal gain or to cause loss to others. It is a [criminal offence](#).

4.2 The Council has a '[Report fraud](#)' page on its website to enable those that suspect fraud has been committed to report to the relevant body as listed below:

- Benefits – signposts to the Benefits page
- Corporate – contractors or staff committing fraud should be reported via [Report Fraud Online](#) or by mailing [reportfraud@southkesteven.gov.uk](mailto:reportfraud@southkesteven.gov.uk)
- Council Tax or Business Rates – should be reported via [Report Fraud Online](#) or by mailing [reportfraud@southkesteven.gov.uk](mailto:reportfraud@southkesteven.gov.uk)
- Electoral – should be reported to the police as quickly as possible

- Housing or Tenancy - should be reported via [Report Fraud Online](#) or by mailing [reportfraud@southkesteven.gov.uk](mailto:reportfraud@southkesteven.gov.uk)
- Cybercrime – should be reported to [Action Fraud](#)

4.3 This report provides a summary of all other disclosures that were received during 2024/25 and the Council's response to those disclosures. These are considered by the Council's Statutory Officers Group.

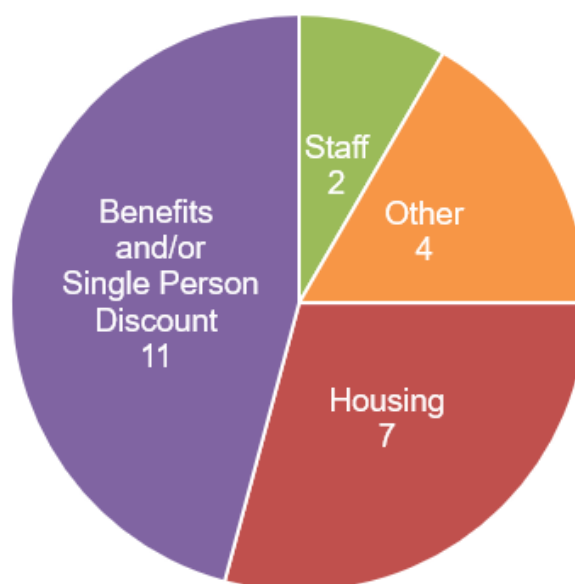
## 5 Summary of Fraud Disclosures

5.1 During 2024/25, the Council received **24** external requests that required investigation, which is an increase on previous years where there were 14 in 2023/24 and 20 in 2022/23.

5.2 The increase is in respect of allegations that Benefits and/or Single Person Discount are being claimed fraudulently.

5.3 All disclosures were made by an external third party, or were anonymous, and as such the legal protection afforded to employees who raise concerns does not extend to these individuals. However, the Council considers that any disclosure made by members of the public should be treated in the same way and consequently makes every reasonable effort to protect all individuals under the Whistleblowing Policy.

5.4 A summary of the category of disclosures made in 2024/25 is provided below and further details are provided in Appendix A.



5.5 The four disclosures relating to the 'Other' category were:

- Procurement rules not followed by a Council owned company
- Numerous concerns around how a business was operating
- Concerns raised over occupancy within caravan park
- Council Tax error

## 5.6 Summary of the outcome below:

Outcome	Number
Unfounded	14
Founded	4
Referred (to the correct place)	4
Ongoing	2
<b>Total</b>	<b>24</b>

## 6 Response to disclosures

- 6.1 Whilst all concerns are taken seriously the response will differ on a case-by-case basis. If the disclosure has been made anonymously, and insufficient details have been provided, the Council may be restricted in the action it can take.
- 6.2 For all disclosures received, the Whistleblowing Policy will be followed i.e. a preliminary fact-finding investigation will be undertaken which, if required, will result in a full investigation by the Accredited Counter Fraud Specialist and formal action being considered.
- 6.3 A Confidential Whistleblowing Investigation Report is completed for all whistleblowing disclosures – the template is attached at Appendix B.
- 6.4 Statutory Officers' Group receive a monthly whistleblowing report, including any investigation reports, in respect of whistleblowing disclosures. Statutory Officers' Group review the reports and agree actions to be taken where appropriate.

## 7 Learning from disclosures

- 7.1 Where an investigation establishes that misconduct or wrongdoing has taken place, appropriate action would be taken including, where appropriate, the use of the Council's formal disciplinary procedure and/or referring matters to third party organisations including the Police.
- 7.2 Where appropriate, management will identify learning points from any issues raised and implement actions to prevent similar issues recurring. If required, this includes consideration of whether there are any systematic improvement actions for the wider organisation.

## 8 Key Considerations

- 8.1 The Committee should monitor and review the whistleblowing arrangements currently in place and the activities that are being undertaken to mitigate those risks.

## 9 Other Options Considered

9.1 None.

## **10 Reasons for the Recommendations**

10.1 Governance and Audit Committee, as part of its terms of reference, 9.1 (xx) should approve the Counter Fraud, Bribery and Corruption Framework, and as part of this should monitor and review the counter fraud arrangements currently in place and the activities that are being undertaken to mitigate those risks.

## **11 Appendices**

11.1 Appendix A – Reporting Fraud and Whistleblowing Disclosures 2024/25

11.2 Appendix B – Confidential Investigation Report Template