



SOUTH
KESTEVEN
DISTRICT
COUNCIL

Governance and Audit Committee

Thursday, 25 June 2026

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

Whistleblowing Policy 2026-28

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 whistleblowing arrangements in place and action taken as a result of whistleblowing disclosures.

Recommendations

The Committee is asked to review the contents of the report and approve the revised Whistleblowing Policy 2026-28.

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Does the report contain any exempt or confidential information not for publication?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

1. Implications

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

1.1 There are no direct financial implications arising from this report.

Completed by: David Scott – Assistant Director of Finance and Deputy S151 Officer

Legal and Governance

1.2 The Governance and Audit Committee have the necessary authority at Part 2 of the Constitution (Articles), paragraph 9.1 (xx) to approve the revised Whistleblowing Policy. Relevant legislation is highlighted within this report.

Completed by: James Welbourn, Democratic Services Manager

Human Resources

1.3 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: Fran Beckitt (Head of HR)

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, whistleblowing is one of the key areas of focus being an essential element of delivering good governance.

2.2 Whistleblowing is the term used when a worker or insider passes on information concerning wrongdoing ie "making a disclosure" or "blowing the whistle". The wrongdoing will typically, although not necessarily, be something they have witnessed at work.

2.3 **What qualifies as whistleblowing**

To be covered by whistleblowing law, a worker who makes a disclosure must:

- reasonably believe that their disclosure is about a certain type of wrongdoing
- reasonably believe that reporting the wrongdoing is in the public interest ie this means that personal grievances and complaints are not usually covered by whistleblowing law; and
- make the report through the appropriate channels

2.4 Disclosures of wrongdoing that count as whistleblowing

A worker must reasonably believe that one or more of the types of wrongdoing has taken place, is taking place, or likely to take place:

- a criminal offence eg an employer committing fraud
- a breach of a legal obligation eg an employer does not have the right insurance
- a miscarriage of justice eg a worker has identified evidence that was not provided to a court that they reasonably believe would have changed the outcome of a case
- someone's health and safety is in danger eg an employer not providing adequate personal protective equipment for hazardous tasks
- damage to the environment eg new business activities are likely to pollute local rivers
- sexual harassment eg a worker sexually harasses other workers
- covering up wrongdoing in the above categories

2.5 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. For matters relating to fraud and corruption, and all other concerns which fall under one of the categories above, these are considered by Statutory Officers Group.

3. Whistleblowing Policy

3.1 To develop and promote greater awareness, and in line with best practice, a review of the Council's whistleblowing arrangements has been undertaken. The Whistleblowing Policy was last approved on 19 June 2024.

3.2 The Whistleblowing Policy has been updated to include the amendments to Employment Law in the Employment Rights Act 2025, which took effect on 6 April 2026, and updates the explicit classification of sexual harassment as a protected, "qualifying disclosure" under the whistleblowing legislation.

3.3 The Whistleblowing Policy covers the following:

- Introduction
- Scope
- Protection and confidentiality
- What you should report
- Anonymous or untrue allegations
- How to raise a concern
- How we will respond
- Taking the matter further
- Monitoring
- Whistleblowing process flowchart

3.4 The whistleblowing process flowchart summarises the steps to be taken on the receipt of a whistleblowing disclosure:

- Disclosure is recorded on the Whistleblowing Log
- Whistleblower, if known, is acknowledged in accordance with the policy
- Disclosure is initially assessed by the Governance and Risk Officer
- If major, the disclosure is reported immediately to Statutory Officers
- Investigating officer appointed depending on the nature of the disclosure
- Outcome report provided to Statutory Officers Group

3.5 The Committee monitors and reviews the whistleblowing arrangements in place, and the activities that are being undertaken to mitigate those risks, by receiving an annual report on whistleblowing and reviewing the Whistleblowing Policy every two years.

4. Other Options Considered

4.1 None.

5. Reasons for the Recommendations

5.1 Governance and Audit Committee, as part of its terms of reference approves Whistleblowing Policy and monitors and reviews the arrangements currently in place and the activities that are being undertaken to mitigate those risks.

6. Appendices

6.1 Appendix A – Whistleblowing Policy 2026-28