



Whistle Blowing Policy

Approval date: 20/04/2026	Approved by: Board
Applies to: All Board Members, officers, employees, contractors, consultants and agents acting on behalf of the Board.	Linked Documents: Members Code of Conduct, Anti Bribery Policy Gifts and Hospitality Policy Anti-Fraud and Corruption Policy.
Frequency of review: 3 years	Next review date: April 2029

1. Introduction

This policy is designed to encourage individuals to speak up about serious concerns relating to the Board’s work, whether those concerns involve misconduct, malpractice, or risks to people or the environment. We want to reassure everyone including staff, contractors, Board members, or others involved in our work, that raising a concern will be treated seriously, in confidence, and without fear of victimisation, discrimination, or disadvantage.

Where requested, we will make every effort to protect the identity of the person raising the concern. However, there may be occasions where they are asked to act as a witness, and we will provide support in such cases.

The purpose of this Whistleblowing Policy is to create a culture where concerns can be raised and resolved internally, rather than being ignored or reported externally, so that problems can be addressed early and appropriately.

2. Policy aims

The aim of this policy is to support a working environment in which individuals, whether employees, suppliers, contractors, Board members, or co-opted individuals, feel confident to raise concerns where they believe misconduct, malpractice, or wrongdoing may be occurring.

This policy is intended to:

- Encourage people to report serious concerns without fear of reprisal.
- Provide clear channels through which concerns can be raised and properly addressed.
- Ensure all concerns are taken seriously, investigated fairly, and responded to appropriately.
- Promote transparency, integrity, and accountability in all aspects of the Board’s operations.

The policy reflects the protections offered under the Public Interest Disclosure Act 1998, which safeguards individuals who raise concerns in the public interest from discrimination or dismissal.

While the policy is primarily intended to support employees and others working directly with the Board, it is also available to members of the public. To support transparency, the policy will be published on our website so that anyone with a serious concern can access it and know how to contact us.



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3. Purpose and scope of this policy

This policy is designed to support a culture of openness, accountability, and ethical conduct. It provides a clear and safe route for raising serious concerns about suspected wrongdoing, malpractice, or risks to people, the environment, or the organisation itself.

The Board is committed to ensuring that:

- Concerns raised in good faith are taken seriously, investigated fairly, and responded to appropriately.
- Individuals who raise concerns are protected from victimisation, harassment, or disadvantage.
- Confidentiality is respected wherever possible, and support is provided if a person is asked to act as a witness.

This policy applies to:

- All current and former employees, including part-time, agency, and temporary staff.
- Board members.
- Individuals co-opted onto Board committees.
- Contractors, suppliers, and others providing services under a contract.
- Members of the public, who may raise concerns directly with the Internal Auditor or Clerk.

This policy supplements, but does not replace, other formal procedures such as the Grievance Procedure (for employment-related issues) or the Complaints Procedure (for service-related issues).

4. What this policy covers

This policy is intended for serious concerns that fall outside the scope of other procedures, such as grievances or service complaints. It provides a mechanism for reporting concerns where there is a reasonable belief that wrongdoing has occurred, is occurring, or is likely to occur.

Examples of concerns that may be raised under this policy include (but are not limited to):

- Criminal offences or breaches of the law.
- Miscarriages of justice.
- Health and safety risks to employees, the public, or others.
- Environmental harm or risk of damage.
- Unauthorised use of public funds.
- Breaches of the Board's Constitution, Standing Orders, or Financial Regulations.
- Suspected fraud, bribery, or corruption.
- Sexual, physical, or emotional abuse.
- Other unethical or improper conduct.
- Deliberate concealment of any of the above.



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You may be unsure whether a concern falls within these categories. If so, we encourage you to seek advice from the Clerk of the Board, the Internal Auditor, or a trusted colleague or trade union representative.

5. What this policy does not cover

This policy is not intended for concerns that fall under other established procedures, including:

- Employment-related issues such as working conditions, pay, or personal grievances. These should be raised through the Grievance Procedure.
- Complaints about services received from the Board. These should be raised through the Board's Complaints Procedure.
- Concerns about Board members' conduct. These should be directed to the Clerk of the Board or the Internal Auditor.

If you're unsure which process applies, you can speak confidentially to the Clerk or Internal Auditor for guidance.

6. Safeguards and protections

The Board recognises that raising a concern can be difficult. We are committed to supporting individuals who do so in good faith and ensuring that whistleblowing is a safe and constructive process.

a) Protection from reprisals

Anyone who raises a concern under this policy will be protected from victimisation, harassment, or any form of disadvantage, provided the concern is raised honestly and in the public interest. Retaliation against someone for whistleblowing will be treated as a serious disciplinary matter.

b) Confidentiality

We will treat all concerns in strict confidence and make every effort to protect the identity of the person raising the concern, if they request this. However, there may be occasions—such as legal proceedings—where we are required to disclose information. If this becomes necessary, we will discuss it with you first.

c) Anonymous concerns

We encourage individuals to raise concerns openly wherever possible, as this allows for better investigation and feedback. However, anonymous concerns will be considered at the Board's discretion, taking into account factors such as:

- The seriousness of the concern.
- The credibility of the information provided.
- Whether the issue can be confirmed through other sources.



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d) Unfounded or malicious allegations

If a concern is raised in good faith but is not upheld after investigation, no action will be taken against the person raising it. However, if a concern is found to have been raised maliciously, frivolously, or for personal gain, appropriate action may be taken, which could include disciplinary proceedings.

7. How to raise a concern

Concerns can be raised verbally or in writing. You do not need to have proof of wrongdoing, simply a reasonable belief that something is wrong. However, the more detail you can provide, the easier it will be to investigate.

a) What to include

If raising a concern in writing, it can help to set out:

- The background and history of the issue (including relevant dates, locations, or people involved).
- Why you are particularly concerned.
- Any supporting evidence, if available.

b) Who to contact

If you are a current employee, the first point of contact is normally your line manager. However, if your concern involves your manager, or you feel uncomfortable approaching them, you may contact:

- The Clerk of the Board.
- The Internal Auditor.
- The Chairman of the Board, if your concern relates to the Clerk.

If you are a member of the public, or someone external to the organisation (e.g. a contractor or supplier), please contact the Internal Auditor in the first instance, or the Clerk of the Board if the Internal Auditor is unavailable.

You may raise the concern on your own or jointly with a colleague or union representative.

You are also welcome to bring a trade union representative, professional body representative, or a colleague or friend to any meeting about your concern.

8. How the Board will respond

All concerns raised under this policy will be taken seriously and considered carefully. Raising a concern is not the same as making an accusation and we are committed to assessing concerns fairly and proportionately.



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a) Initial response

Within **ten working days** of your concern being received, you will receive a written acknowledgment (unless raised anonymously), outlining:

- That your concern has been received.
- How we plan to deal with the matter.
- Whether any initial enquiries have been made.
- Whether further investigation will take place, and if not, why not.
- An estimated timescale for a full response.
- Available support, if appropriate.

b) Possible actions

Depending on the nature of the concern, the Board may:

- Investigate the matter internally (e.g. by management, the Clerk, or the Internal Auditor).
- Refer the matter to the police or another external authority.
- Appoint an independent investigator or panel.
- Take urgent corrective action before a full investigation begins.
- Refer the issue under a different procedure (e.g. disciplinary, safeguarding, or financial regulations) if more appropriate.

c) Ongoing communication

The amount of contact you will have with the person handling the case will depend on the nature and complexity of the concern. We may need to follow up with you for more information or clarification.

If you are asked to give evidence in disciplinary or criminal proceedings, we will support you through the process.

d) Feedback and outcome

While we may not be able to share full details for legal or confidentiality reasons, we will confirm when the matter has been concluded and provide as much feedback as possible.

9. Oversight and next steps

a) Responsible officer

The Clerk of the Board has overall responsibility for maintaining and operating this policy. In their absence, this role will be fulfilled by the Internal Auditor. They are responsible for:

- Ensuring concerns are recorded and monitored (in a way that protects confidentiality).
- Reporting outcomes or patterns of concern to the Board Chairman as necessary.
- Reviewing and updating the policy in line with legislative or structural changes.



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b) If you are not satisfied

We hope you will be satisfied with the way your concern is handled. However, if you are not, or if you feel your concern has not been addressed properly, you may escalate it outside the Board.

Independent organisations you may contact include:

- The District Auditor.
- Your trade union.
- The Citizens Advice Bureau.
- A relevant professional or regulatory body.
- The police, if criminal activity is suspected.
- Protect (formerly Public Concern at Work): Free, confidential advice on whistleblowing: 020 3117 2520 / www.protect-advice.org.uk.

Important: If you do take your concern outside the Board, please be mindful not to disclose confidential or personal information unless legally authorised to do so. If in doubt, seek advice first from the Clerk or Internal Auditor.

10. Whistleblowing: Dos and don'ts

Raising a concern can feel daunting, but these tips may help you approach it with clarity and confidence.

✔ Do:

- **Stay calm.** Take time to think through your concern and how best to raise it.
- **Be clear and factual.** Focus on what you know—dates, times, observations—not assumptions.
- **Keep a record.** Make notes of what you've seen or heard and when.
- **Seek support.** You can speak to a trusted colleague, union rep, or the helpline at Protect.
- **Remember you are not alone.** Raising a concern is a positive act of integrity.

✘ Don't:

- **Jump to conclusions.** There may be an innocent explanation. Raising a concern allows proper checks to be made.
- **Conduct your own investigation.** Leave fact-finding to those with responsibility for the process.
- **Use whistleblowing to settle personal grievances.** Use the grievance procedure for employment-related issues.
- **Expect thanks or recognition.** The aim is to ensure wrongdoing is addressed, not personal reward.



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11. Review and revision

This policy will be reviewed every three years, or sooner if required due to:

- Changes in legislation or case law (e.g. updates to the Public Interest Disclosure Act or employment rights).
- Structural or procedural changes within the Board.
- Lessons learned from investigations or feedback on the policy's operation.

Responsibility for ensuring the timely review of this policy rests with the Clerk of the Board. Any proposed amendments will be submitted to the Board for approval.

Version Control

Version	Date Approved	Summary of Changes
1.0	20/04/2026	Initial policy approved