






**AXE BRUE, PARRETT & NORTH SOMERSET LEVELS
INTERNAL DRAINAGE BOARDS**

GOVERNANCE

**WHISTLEBLOWING AND
CONFIDENTIAL REPORTING POLICY**

Version 4

Approved by the Boards:			
Axe Brue IDB		26/02/2026	Chairman
Parrett IDB		26/02/2026	Chairman
North Somerset Levels IDB		26/02/2026	Chairman

To be reviewed every 3 years or when there are changes in legislation.

1.0. Policy Aims

1.1. This policy is established to encourage transparency and accountability within the Drainage Boards by providing a safe, clear and supportive process for raising concerns about possible wrongdoing.

1.2. The aim of this policy is to maintain a working environment where people, whether they are employees of the Board, suppliers, contractors, members or private individuals co-opted on to committees of the Board are able to raise concerns where they think there is misconduct or malpractice, and to know that their concerns will be taken seriously and investigated.

1.3. The policy is intended to give confidence to employees to whistle blow and, as such, it incorporates statutory provision for protection under the Public Interest Disclosure Act 1998.

1.4. The whistle blowing policy is also available to members of the public, to enable them to contact us with their concerns of Board conduct and operations.

1.5. Definitions

- Whistleblowing The act of reporting information of suspected wrongdoing, malpractice or unethical behaviour by an individual within the organisation, which in the public interest should be brought to attention.
- Protected Disclosure A whistleblowing concern that qualifies for protection under the Public Interest Disclosure Act 1998 includes but is not limited to, matters involving criminal offences, risks to public health and safety, environmental harm or a miscarriage of justice.

2.0. Our Commitment

2.1. The Board attaches high priority to ethical standards and probity and is committed to taking appropriate action where misconduct or malpractice is identified. We are committed to being open, honest and accountable.

2.2. The Board and the legislation will protect both former and current staff from being penalised or suffering detriment for raising concerns about misconduct or malpractice provided that allegations are made in good faith and without mischievous or malicious intent.

2.3. The following are affected by this policy:

- a. All former and current employees including part time, agency and temporary staff.
- b. Board Members.
- c. Private individuals co-opted on to committees of the Board and volunteers.

- d. Suppliers and those providing services under a contract whether working for the Board on Board premises or their own premises or in the field.

3.0. Introduction

3.1. Employees are often the first to realise that there may be something seriously wrong within the Board. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Board. They may also fear harassment or victimisation. In line with the policy statement we encourage employees and others that we work with, who have serious concerns about any aspect of the Board's work, to come forward and voice those concerns.

3.2. All concerns will be treated in confidence and every effort will be made not to reveal anyone's identity if they so wish. At the appropriate time however, they may need to come forward as a witness. We wish to make it clear that they can do so without fear of victimisation, subsequent discrimination, disadvantage or recrimination.

3.3. This 'Whistle blowing and Confidential Reporting Policy' aims to encourage and make it possible for employees to raise serious concerns within the Board rather than overlooking a problem or 'blowing the whistle' outside the Board. Whistleblowing involves reporting serious wrongdoing that affects others, often of a public interest nature, while a grievance is a personal complaint about an individual's employment terms or treatment.

4.0. Aim and Scope of the Policy

4.1. This policy aims to:

- a. Encourage anyone to feel confident in raising serious concerns and to question and act on their concerns about practice.
- b. Provide avenues for anyone to raise those concerns and receive feedback on any action taken and make sure that everyone receives a response to their concerns and that they are aware of how to pursue them if they are not satisfied.
- c. Reassure anyone that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure in good faith.

4.2. There are existing procedures in place which make it possible for staff to lodge a grievance relating to their own employment. This policy is intended to cover major concerns that fall outside the scope of other policies and procedures. These concerns include:

- a. Conduct which is an offence or a breach of law.
- b. Disclosures related to miscarriages of justice.
- c. Health and safety risks, including risks to the public as well as other employees.

- d. Damage to the environment.
- e. The unauthorised use of public funds.
- f. The Board's Constitution (including Standing Orders or Other Regulations etc) not being observed or are being breached by members and/or officers.
- g. Possible fraud and corruption.
- h. Sexual or physical abuse of staff or consumers..
- i. Other unethical conduct.
- j. Information relating to any of the above being deliberately concealed or attempts being made to conceal the same.

4.3. This means that any serious concerns anyone has about any aspect of service provision or the conduct of officers or members of the Board or others acting on behalf of the Board can be reported under this policy. This may be about something that:

- a. Makes anyone feel uncomfortable in terms of known standards, their experience or the standards they believe the Board subscribes to.
- b. Is against Financial Regulations, Board Procedure Rules, and so on.
- c. Falls below established standards of practice.
- d. Amounts to improper conduct.

4.4. This policy cannot be used to deal with serious or sensitive matters that are covered by other procedures. Such procedures include the following:

- a. Staff complaints about their employment. These complaints are dealt with through our Grievance Procedure.
- b. Customers' complaints about our services. These complaints are dealt with through our Complaints Procedure.
- c. Allegations against members. Those wishing to whistle blow on board members should do so directly to the Chief Executive or Chair of the Board or the Internal Auditor.

5.0. Safeguards

5.1. The Board is committed to good practice and high standards and wants to be supportive of employees. It is recognised that the decision to report a concern can be a difficult one to make. If what is being reported is true, there should be nothing to fear because the person reporting will be doing their duty to the employer and those for

whom they are providing a service. The law prohibits any adverse action against individuals making protected disclosures. Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect staff.

6.0. Confidentiality

6.1. All concerns will be treated in confidence and every effort will be made not to reveal anyone's identity if they so wish. At the appropriate time however, you may need to come forward as a witness.

7.0. Anonymous Allegations

7.1. This policy encourages anyone to put their name to an allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Board. In exercising this discretion the factors to be taken into account would include:

- a. The seriousness of the issues raised.
- b. The credibility of the concern.
- c. The likelihood of confirming the allegation from attributable sources.

8.0. Untrue Allegations

8.1. If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the person concerned. If, however, they make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them where appropriate.

9.0. How to Raise a Concern

9.1. If you are an Employee of the Board, you should normally raise your concerns with your Line Manager. This depends however on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach the Chief Executive or in the absence of the Chief Executive, or if the complaint relates to the Chief Executive, the Internal Auditor or the Board Chairman.

9.2. Concerns must be raised in writing; stating the background and history of the concern (giving relevant dates) and the reason why the individual is particularly concerned about the situation.

9.3. The earlier the concern is expressed the easier it is to take action. Although no one is expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person being contacted that there are reasonable grounds for their concern.

9.4. Advice and guidance on how to pursue matters of concern may be obtained from the Chief Executive or the Internal Auditor. If necessary the whistleblower may wish to seek independent legal advice.

9.5. It may be appropriate to consider discussing a concern with a colleague first and it may be easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

9.6. Employees may also invite their trade union, professional association representative or a friend to be present during any meetings or interviews in connection with the concerns they have raised.

9.7. Unions and professional associations may also raise matters of concern on behalf of their members employed by the Board.

9.8. If an Employee prefers not to raise their concern through their Line Manager, they may report it to the Manager of their Line Manager or if that is a Senior Officer to the Chair.

9.9. If you are a member of the public you should contact the Chief Executive or if he is not available, the Chair of the Board.

10.0. How the Board Will Respond

10.1. The Board will respond to any concerns. Do not forget that testing out concerns is not the same as either accepting or rejecting them. Where appropriate, the matters raised may:

- a. Be investigated by management, internal audit, or through the disciplinary process.
- b. Be referred to the police.
- c. Be referred to the external auditor.
- d. Form the subject of an independent inquiry.

10.2. In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form should it take.

10.3. The overriding principle which the Board will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example fraud or discrimination issues) will normally be referred for consideration under those procedures.

10.4. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is carried out.

10.5. Within ten working days of a concern being raised, a Line Manager, the Chief Executive or the Internal Auditor, depending upon who has been approached, will write:

- a. Advising that the concern has been received.
- b. Advising how we propose to deal with the matter.
- c. Giving an estimate of how long it will take to provide a final response.
- d. Advising whether any initial enquiries have been made.
- e. Supplying information on staff support mechanisms where appropriate.
- f. Advising whether further investigations will take place and, if not, why not.

10.6. The amount of contact between the officers considering the issues and the person raising them; will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Board will get further information from them.

10.7. The Board will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, if it is necessary to give evidence in criminal or disciplinary proceedings, the Board will arrange for advice about the procedure.

10.8. The Board accepts that individuals need to be confident that the matter has been properly addressed. Therefore, subject to legal constraints, we will tell them the outcome of any investigation.

11.0. The Responsible Officer

11.1. The Chief Executive has overall responsibility for the maintenance and operation of this policy and will appoint the Whistleblowing Officer for each case. In his absence the Consortium Chair & Vice Chair will fill this role.

11.2. The Whistleblowing Officer is responsible for managing the process ensuring that concerns are properly investigated and maintain records of all reports and outcomes.

11.3. In the absence of the Chief Executive, the Internal Auditor will act on his/her behalf. They maintain a record of concerns raised and the outcomes (but in a form which does not endanger anyone's confidentiality) and will report as necessary to the Board.

11.4. The Board's Internal Auditors are TIAA.

12.0. How The Matter Can Be Taken Further

12.1. This policy is intended to provide anyone with an avenue within the Board to raise concerns. If internal advice is required before starting action, you may talk to an immediate Line Manager, the Internal Auditor, the Chief Executive of the Board or the local union branch.

12.2. The Board hopes everyone will be satisfied with any action taken. If they are not, and they feel it is right to take the matter outside the Board, the following are possible contact points:

- a. The District Auditor.
- b. UNISON Whistle blowers hotline 0845 355 0845.
- c. The local Citizens Advice Bureau.
- d. Relevant professional bodies or regulatory organisations.
- e. A relevant voluntary organisation.
- f. The police.
- g. The independent charity Protect. They can give free confidential advice at any stage about how to raise a concern about serious malpractice at work. The charity's contact details are:

Protect, The Green House
244-254 Cambridge Heath Road
London E2 9DA

Telephone:020 3117 2520 Email: whistle@protect-advice.org.uk

12.3. If the matter is taken outside the Board, please make sure that you do not disclose confidential information. Check with the Chief Executive or Internal Auditor if you are unsure what information can be disclosed.

13.0. Redress

Should a whistleblower experience any detriment as a result of their disclosure, they are encouraged to report this immediately. Such cases will be investigated promptly, and the whistleblower will have access to appropriate redress, including formal grievance procedures and, where necessary, legal redress.

14.0. Whistle Blowing Do's and Don'ts

14.1. Do

- a. Keep calm
- b. Think about the risks and outcomes before you act.
- c. Remember you are a witness, not a complainant.
- d. Phone Protect on 020 31172520 <https://protect-advice.org.uk/>

14.2. Don't

- a. Forget there may be an innocent or good explanation.
- b. Become a private detective.
- c. Use whistle blowing procedures to pursue a personal grievance.
- d. Expect thanks.

15.0. Policy Review

15.1. The policy will be reviewed every 3 years or where there are any changes in legislation.