



# Title of report: Whistleblowing Update

**Meeting: Audit and Governance Committee**

**Meeting date: Tuesday 28 October 2025**

**Report by: Head of Legal Services and Deputy Monitoring Officer**

## **Classification**

Open

## **Decision type**

This is not an executive decision

## **Wards affected**

(All Wards);

## **Purpose**

To update the Committee as to the operation of the Whistleblowing Policy.

## **Recommendation(s)**

**That:**

- a) **The committee notes the operation of the employee Whistleblowing Policy since the update in October 2024.**

## **Alternative options**

1. There are no other alternatives.

## **Key considerations**

2. The Terms of Reference for this committee includes at paragraph 3.5.12 (e) *'To maintain an overview and agree changes to the council policies on whistleblowing and the 'Anti-fraud and corruption strategy'.*
3. A Whistleblowing Policy has been adopted by the Council to expressly provide a position and process around protections for staff (and associated workers) who wish to make a public interest disclosure. This reflects the legal protections under the Public Interest Disclosure Act 1998.

4. On [23 June 2023](#) the Committee reviewed and approved the existing Whistleblowing Policy and this is available to staff on the Council's [website](#).
5. The policy sets out the policy and steps involved should an employee wish to make a disclosure. In addition, there is a further process that enables a member of staff to make a disclosure anonymously through the Monitoring Officer.
6. The concept of 'whistleblowing' is not just related to that performed under the employee Whistleblowing Policy. Ordinary complaints from members of the public and service users are technically someone 'whistleblowing' and these are dealt with under the Council complaints processes. This process includes where a person wishes to make an anonymous complaint.
7. The number of referrals made to the Council via the Monitoring Officer anonymously was 6 in 2020/21, 9 in 2021/22, 14 in 2022/23, 3 in 2023/24, 2 for 2024/25 and 2 so far for 2025/26.
8. Even if a matter is raised through the whistleblowing channel to the Monitoring Officer, there is the option to enable a disclosure to be made without disclosing the name of the person raising the concern – however, the individual is informed that the facts may reveal their identity and any investigation may be compromised if it is done anonymously.

#### Disclosures in 2024/25

9. Five disclosures have been received in 2024/25
10. Three disclosures were closed as did relate to the Council. The first related to a different council and the second related to a third-party body. In both circumstances, advice and sign posting was made to the complainant to suggest how they could progress their complaint with the appropriate body. The third complaint related to an individual who was not employed by the Council. The offer was made to refer the complaint to the relevant body, but this was not requested, and the nature of the complaint was not sufficiently serious that the Council would consider making such a referral without further information or grounds.
11. In respect to the final two disclosures, both were investigated by the relevant department and in both instances, the disclosures were found to be valid which required corrective changes to process and policies within each department. Recommendations were made and these were accepted and implemented within the department.

#### Disclosures in 2025/26

12. Five disclosures have been received in 2025/26.
13. Investigations into two disclosures are ongoing. One disclosure has been investigated in full by the manager and director and no findings have been made.
14. The final two disclosures are on hold and with the persons raising the concern.

#### Whistleblowing Policy

15. It is not considered that the Whistleblowing Policy requires any further update.

### **Community impact**

16. Herefordshire Council is accountable for how it uses the resources under its stewardship, including accountability for outputs and outcomes achieved. In addition the council has an overarching responsibility to serve the public interest in adhering to the requirements of legislation and government policies. Periodic reviews to ensure the Policy remains current, fit

for purpose and effective helps the council to meet the principles within its code of corporate governance.

### **Environmental Impact**

17. There are minimal environmental impacts in the Whistleblowing Policy though of course any environmental concerns can be raised under the policy.

### **Equality duty**

18. The policy is open to all employees. Many complaints are raised on an anonymous basis. Where a matter is raised and if it relates to an equality issue, then it would be investigated by the relevant department as part of the complaint. The mandatory equality checklist has been completed and it is not considered that this paper has any negative impacts on employees with a protected characteristic.

### **Resource implications**

19. There are no resource implications as the operation of the Whistleblowing Policy.

### **Legal implications**

20. Any legal implications are set out in the body of this report.

### **Risk management**

21. Failure to maintain a legally compliant whistle blowing policy could contravene employment law and leave the council open to challenge with associated financial penalties and bring the council into disrepute.

### **Consultees**

22. None

### **Appendices**

None

### **Background papers**

None