

Whistleblowing Policy

This Policy has been written to include, so far as is reasonable, preventative procedures in relation to Corporate Criminal Offence, pursuant to section 45(2) of the Criminal Finances Act 2017



OCTOBER 2023

Date of Implementation:

19/01/2016

Policy Owner:

Governance Officer

Current version:

3

Next review due:

01/10/2025

Review Detail

Date of Review	Summary of key Changes	Minor or Major Change
April 2021	Updated scope to include reference to CCO.	Minor – approval by CMT
October 2021	Updated information and links in Sections 5 & 6	Minor – approval by CMT
October 2022	No change	
October 2023	No change	

Policy Statement

This policy aims to set out the principles of Protection of colleagues when making public interest disclosures and to set out the action to take to report or raise such concerns.

Improper conduct, be it illegal or unethical, have a cost to our residents, so in order to be a high performing and value for money Council, we must make sure that everyone feels they are able to raise concerns which they believe are in the public interest relating to illegal, improper or unethical conduct.

Ian Fytche
Chief Executive



1.0 Scope

This policy applies to colleagues (employees), Members, contractors and others who raise concerns related to improper conduct, including suspected fraud.

This policy has been written to include, so far as is reasonable, preventative procedures in relation to Corporate Criminal Offence, pursuant to section 45(2) of the Criminal Finances Act 2017.

2.0 Definitions

Colleagues: includes staff working full-time, part-time, temporary and casual, as well as agency and contractor staff.

Public Interest: a common concern in the management and affairs of a public body.

Whistleblowing: the reporting of suspected wrongdoing at work.

3.0 Principles

1. The Council is committed to the highest standards of conduct and expect the same from all Colleagues, Members and those acting on behalf of the Council.
2. The Council seeks to promote a culture of openness and transparency.
3. The Council is committed to providing an environment, which encourages and promotes the raising of issues considered to be in the public interest with the confidence that reports will be acted upon appropriately.
4. Colleagues will be protected from detrimental treatment i.e. victimisation or dismissal when raising concerns related to potential malpractice that is in the public interest to disclose.
5. When making a disclosure anonymously, or if a person requests confidentiality, the Council will make every effort to protect a Whistleblower's identity.
6. This policy complies with the Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013.

4.0 Responsibilities

Chief Executive	To hold ultimate accountability for effective Whistleblowing arrangements
Monitoring Officer	To provide advice on ethical issues, standards and powers to ensure the Council operates within the law and statutory practices
Director of Resources and Section 151 Officer	To ensure the provision of an effectively resourced Counter Fraud and Internal Audit service
Audit Committee	To monitor the Council's policies and the effectiveness of the Whistleblowing Policy and Counter Fraud, Corruption, and Bribery Strategy and procedures
Members	To support, promote and maintain a strong and effective counter fraud culture
External Audit	To maintain a statutory duty to ensure the Council has adequate arrangements for the prevention, reporting, investigation and detection of fraud, the facilitation of criminal tax evasion, corruption, bribery and theft
Internal Audit (Assurance Lincolnshire)	To provide a continuing role in developing and implementing the whistleblowing arrangements and to investigate cases of suspected fraud, the facilitation of criminal tax evasion, corruption, bribery and theft. To recommend improvements to controls and procedures, reducing the risk of future fraud, the facilitation of criminal tax evasion, corruption, bribery and theft
Managers	To promote staff awareness of the arrangements to counter fraud, the facilitation of criminal tax evasion, corruption, bribery and theft, and the arrangements for whistleblowing, and to respond appropriately to concerns raised
Colleagues and Members	To comply with Council policies and procedures in their general conduct and the execution of their duties, being aware of the possibility of fraud, the facilitation of criminal tax evasion, corruption, bribery and theft. To report any genuine concerns to management, internal audit or via the Whistleblowing arrangements
Public, Partners, Contractors, Consultants and Suppliers	To be aware of the possibility of fraud and corruption against the Council, reporting any genuine concerns or suspicions

5.0 Whistleblowing Arrangements

Our aim is that all individuals feel confident in raising concerns with their manager; however, matters of concern may be pursued through whichever means an individual feels most comfortable with.

North Kesteven District Council uses the shared confidential hotline dedicated to whistleblowing.

Telephone: **0800 0853716**

E-mail: **whistleblowing@lincolnshire.gov.uk**

By Post: **Lincolnshire Local Authorities,
PO Box 640 Lincoln
LN1 1WF**

Within the Corporate Management Team, concerns may be raised with any of the following officers:

- Chief Executive or the Deputy Chief Executive
- Monitoring Officer - Lincolnshire Legal Services
- Deputy Monitoring Officer - Democratic Services Manager
- Director of Resources and Section 151 Officer

In addition, the Public Interest Disclosure (Prescribed Persons) Order 2014 recognises certain appointed bodies for the purpose of disclosures. These include a local MP or any of those detailed in the Order:

www

www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

6.0 Fraud Response Procedures

The Council has in place Fraud Response Procedures which set out the action the Council will take on receipt of any allegation of fraud, the facilitation of criminal tax evasion, corruption, bribery or act of wrongdoing.

These procedures can be found on the Council website:

<https://www.n-kesteven.gov.uk/your-council/facts-and-figures-about-the-council/council-spending/council-transparency/counter-fraud-corruption-bribery-and-money-laundering/>

7.0 Monitoring

This policy will be reviewed every 2 years or sooner if new requirements or other information alters the information herein.



North Kesteven
DISTRICT COUNCIL

District Council Offices, Kesteven Street, Sleaford, Lincolnshire NG34 7EF
Telephone Number: (01529) 414155