

Whistleblowing Policy

Live from 1 April 2026

Annual evolution changes to this policy are shown in red text each year

Finance

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1 PURPOSE OF THIS POLICY

- 1.1 Bournemouth, Christchurch and Poole Council (BCP) (hereafter referred to as 'the Council') is committed to high standards of conduct and to compliance with legal obligations and good practice. The Council's intent is to expose and deal with malpractice and it expects its employees, and others who help to deliver its services, to report all instances where they have reasonable suspicions of wrongdoing. Failure to report wrongdoing may lead to financial or reputational damage, poor staff morale and erosion of trust.
- 1.2 The term whistleblowing is generally used only with reference to workers (referred to in Law as making a protected disclosure) and has a specific legal definition pursuant to the Public Interest Disclosure Act 1998 (PIDA), i.e. a disclosure of information which, in the reasonable belief of the worker, is made in the public interest. This Policy is primarily intended to deal with wrongdoing alleged against the Council or its employees and therefore the protected disclosures should relate to Council business. The disclosure of information must always be more than an un-particularised allegation or mere opinion.
- 1.3 The Council recognises that, as a public body, it might receive a disclosure of information not just from its workers but from members of the public. A disclosure made by any person who is not a worker of the Council does not meet the legislative definition of whistleblowing (a protected/qualifying disclosure) and will be addressed by applying other relevant Council Policies.
- 1.4 The Council recognises that it is a [prescribed person](#) and that workers from external organisations may approach the Council to report suspected or known wrongdoing in relation to Health and Safety, Consumer Protection and Food Standards. The relevant individual services have their own procedures for dealing with such disclosures.
- 1.5 This policy incorporates the requirements of PIDA into the Council's governance framework and provides managers with the necessary information to consider cases of whistleblowing. The legislation is contained in Part IV A of the Employment Rights Act 1996 sections 43A to 43L, 47B, 103A and secondary legislation identifying the prescribed persons to report concerns to and the specific areas each covers.
- 1.6 In addition, this policy aims to ensure that those covered by this policy:
- feel confident in raising concerns in the public interest about suspected serious wrongdoing in the Council and its services without fear of reprisals or victimisation even where the concern or allegations are not subsequently confirmed by the investigation;
 - can raise concerns in confidence and receive feedback on any action taken;
 - receive a response to concerns and are aware of how to pursue them if they are not satisfied;
 - and are protected from possible reprisals or victimisation where they have reported concerns in the public interest.

- 1.7 The Council will take any action necessary in proportion to the nature of the complaint. The Policy's intent is to ensure that whenever a qualifying person (see 3.1-3.3) has a reasonable belief that their disclosure is in the public interest and meets with one or more of the circumstances in paragraph 3.7 (a to f), they will be protected from detriment (for example victimisation, bullying or being disciplined).

2 WHO MUST COMPLY WITH THIS POLICY?

- 2.1 This policy applies to:
- any person who is currently employed by Bournemouth, Christchurch and Poole Council (BCP),
 - Elected or co-opted councillors,
 - Any other individual who undertakes activities on behalf of the Council including for example, volunteers, partners, contractors, foster carers etc.
- 2.2 It is expected that all organisations that are part or wholly owned by the Council will have their own whistleblowing arrangements which ensure that proper reporting arrangements are in place which are consistent with the requirements of the PIDA and that staff are fully protected in line with this legislation. If such organisations do not have their own Whistleblowing Policy arrangements, then the Council's will apply.
- 2.3 All organisations that carry out activities on behalf of the Council, for example providers of commissioned services, are expected to have appropriate and robust whistleblowing arrangements which are consistent with the requirements set out in legislation and in this policy.
- 2.4 The Department for Education state that Maintained schools should have their own [in-house whistleblowing procedures](#). Maintained schools can make representation to the Head of Audit and Management Assurance (HAMA) to act as an external representative.
- 2.5 The [Academy Trust Handbook](#) (also known as the Academies Financial Handbook) sets out the requirements for Academies in respect of their whistleblowing arrangements. In doing so, the Handbook (section 2.40) states that **“The board of trustees must agree a procedure for whistleblowing, and publish it on the trust's website, to protect staff who report individuals they believe are doing something wrong or illegal.”**

3 WHAT IS THE POLICY?

Who is protected

- 3.1 An employee* is protected by the legislation from any detriment as a result of having made a qualifying protected disclosure and/or from being dismissed where it could be found that the main reason for their dismissal (if there is more than one) was because they had made such a disclosure.

*The terms 'worker' and 'employee' are interchangeable for the purposes of this policy.

- 3.2 Other people protected are:
- Most agency employees,
 - Some trainees such as apprentices,
 - Former employees who have made disclosures whilst still employed (and they suffer a detriment after employment).

- 3.3 The people described in 3.1 and 3.2 will be referred to as 'qualifying individuals' in the rest of this policy.

Who is not protected

- 3.4 The following individuals, whilst having to comply with this policy, are not protected by the relevant legislation:
- Councillors
 - Volunteers
 - Public appointments
 - Self-Employed persons
 - Foster Carers/Shared Lives providers
 - Interns
 - Former employees who have made disclosures after leaving the Council.

- 3.5 These people will be offered support, confidentially as far as possible, and will be provided with a contact who can receive complaints which might otherwise be considered whistleblowing type concerns. Members of the public maybe signposted to a relevant 'prescribed person' to send their concern to if the Council is not the appropriate body.

- 3.6 Councillors are not employees of the Council and are therefore not protected under whistleblowing legislation. However, Councillors should raise any concerns via the proper democratic processes of the Council, by contacting one or more of the following:
- Leader of the Council
 - Head of Paid Service
 - Monitoring Officer
 - The relevant Overview and Scrutiny Board

Types of disclosure covered by this policy

- 3.7 PIDA specifies what 'Qualifying Disclosures' are. The qualifying individual disclosing information must have a reasonable belief that their disclosure is made in the public interest and tends to show that any of the following apply:
- (a) that a criminal offence has been committed, is being committed or is likely to be committed,
 - (b) that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he/she is subject,
 - (c) that a miscarriage of justice has occurred, is occurring or is likely to occur,
 - (d) that the health or safety of any individual has been, is being or is likely to be endangered,
 - (e) that the environment has been, is being or is likely to be damaged, or

- (f) that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.
- 3.8 There can be some confusion between grievances and whistleblowing. Whistleblowing is the raising of a concern about a danger or risk so that it may be investigated, while a grievance seeks redress for a wrong done to oneself (or a group of employees if the individual is also one of those employees).
- 3.9 This policy does not apply to raising grievances about a person's personal situation and thus does not replace existing procedures for resolving personal differences or conflicts. If an employee has concerns in respect of a personal grievance (e.g. bullying, harassment, discrimination) they should consult the Grievance Policy and Procedure, their immediate manager, Human Resources (HR) and/or Legal Services who can advise them about the correct procedure to follow.

Safeguarding Concerns raised by Council Employees

- 3.10 Employees have a duty to report in a timely way any concerns or suspicions they may have that an adult or child at risk, is being, or is at risk of being, harmed and the Council has specific arrangements in place to address concerns raised, which are summarised below:

If you think someone may be at immediate risk of serious harm, contact the Police.

- 3.11 Children's Safeguarding:
To report Children's safeguarding concerns staff should contact the Multi Agency Safeguarding Hub via email childrensfirstresponse@bcpcouncil.gov.uk or via telephone on 01202 123334

An allegation against someone who works with children and young people or a concern about their suitability to work with children and young people should be reported direct to the Local Authority Designated Officer (LADO) - lado@bcpcouncil.gov.uk or via telephone 01202 817600.

For emergency safeguarding concerns outside of office hours contact can be made with the children's social care Emergency Duty Service via telephone on 01202 738256

- 3.12 Adults Safeguarding:
For safeguarding concerns relating to Bournemouth, Christchurch or Poole residents, get in touch with the ASC Contact Centre who are responsible for receiving and assessing Adults safeguarding concerns via email asc.contactcentre@bcpcouncil.gov.uk or via telephone: 01202 123654.

For emergency safeguarding concerns outside of office hours contact can be made with the adult social care Emergency Duty Service on 0300 123 9895.

- 3.13 A safeguarding concern (Children's or Adults) raised by an employee may also be a 'qualifying disclosure' under whistleblowing legislation (as per paragraph 3.7). If the concern relates to wrongdoing alleged against the Council or its employees, the employee will be protected under this policy and should be

reported to the Head of Audit & Management Assurance (HAMA) who is responsible for annual reporting (see paragraph 6.6).

4 WHAT IS EXPECTED FROM THE WHISTLEBLOWER?

- 4.1 Employees will normally raise their concerns with their line manager. The matter will then be dealt with in line with the seven-stage procedure at Appendix 1.
- 4.2 If a qualifying individual makes a disclosure within the Council, they are expected to:
- have reasonable grounds for suspicion about the malpractice;
 - have a reasonable belief that the disclosure is in the public interest; and
 - not make the disclosure for personal gain.
- 4.3 The Council acknowledges the seriousness of knowingly making false accusations, as such actions can undermine the credibility of the whistleblowing process and potentially harm the Council's or an individual's reputation. Failure to comply with the expectations above, including, making a frivolous or malicious disclosure may result in disciplinary action being taken.

Note: If an individual is currently involved in a theft, fraud, disciplinary matter or employment dispute, and the individual subsequently makes a whistleblowing disclosure, then this will not stop or pause any ongoing investigation into the original matters. In such circumstances any qualifying disclosures will be treated separately in line with this Policy.

Disclosures that are not proved

- 4.4 A qualifying disclosure that is not confirmed by subsequent investigation will not lead to any action, penalty or detriment against the person making the allegation or disclosure providing the provisos contained in 4.2 apply.

Disclosures to other organisations

- 4.5 The Council is committed to addressing all genuine and serious concerns raised and therefore disclosures should be made to the Council in the first instance. However, if a qualifying individual feels unable to use the procedure described in this policy the disclosure should be made to a prescribed person, so that their employment rights are protected.
- 4.6 If a qualifying individual decides they cannot go to the Council with the disclosure first, they should contact a [prescribed person or body](#).

Anonymous disclosures

- 4.7 Whilst this policy is intended to deter people from making anonymous disclosures, they will be considered to the extent that it is reasonable and practicable to do so. It is often difficult to attach equal weight to anonymous allegations due to the investigator's difficulty in confirming or following up evidence.

5 HOW IS THE WHISTLEBLOWER PROTECTED?

5.1 The following safeguards and principles should be applied in all cases.

Confidentiality and Anonymity

5.2 The Council's Whistleblowing Policy seeks to protect the identity of the individual making a disclosure. However, in alleged cases of serious wrongdoing, it must be appreciated that the Council cannot guarantee that this will be maintained particularly if external legal action results from the disclosure. In some cases, a qualifying individual's concern may require further action and they may have to act as a witness and/or provide evidence, for example serious criminal offences which are referred to the Police.

5.3 Anyone within the Council who inappropriately breaches a whistleblower's confidentiality or anonymity will be subject to disciplinary action which may lead to dismissal.

5.4 If a disclosure relates to a child at risk or abuse of a vulnerable adult, then the Council is required to investigate this under separate procedures and this takes priority over any request for anonymity.

Harassment and Victimisation

5.5 The Council acknowledges that the decision to report a concern can be a difficult choice for an individual to make, not least because of the fear of reprisal from those responsible for the malpractice. Any qualifying individual who makes a 'qualifying disclosure' which meets the requirements of the PIDA is legally protected against victimisation or harassment for whistleblowing.

5.6 Anyone within the Council who harasses or victimises a whistleblower will be subject to disciplinary action which may lead to dismissal.

5.7 Managers are responsible for monitoring how whistleblowers are subsequently treated after raising a concern. They will ensure that any harassment or victimisation is dealt with under disciplinary arrangements.

5.8 Any qualifying individual who believes they have been victimised as a result of making a disclosure or whistleblowing should report their concerns to their Service Director (or the Corporate Director if this is more appropriate).

6 HOW IS THIS POLICY IMPLEMENTED?

Procedure

6.1 Disclosures will be dealt with under the following stages. Not all disclosures will follow all stages in the order below, subject to the circumstances of each case. The action taken by the Council will be reasonable and proportionate, depending on the nature of the concern.

6.2 Disclosures will be dealt with under the following stages:

- Stage 1 – Informal Resolution
- Stage 2 – Formal Resolution
- Stage 3 – Response for a Formal Resolution
- Stage 4 – Investigation
- Stage 5 – Responding to the Investigation
- Stage 6 – Confirmation of the Outcome
- Stage 7 – Lessons learnt in consultation with the whistleblower

Further details can be found in Appendix 1 – Seven Stage Whistleblowing Procedure.

- 6.3 If the individual is dissatisfied with the outcome response or the process followed, they should put their concern in writing to the Chief Executive and request that the investigation is reviewed. Protect (previously Public Concern at Work) may also be contacted on 020 3117 2520.

Implementation and Communication

- 6.4 New staff joining the Council will be given information and guidance on the policy during their corporate induction and it will be integrated into training and documents relating to conduct and behaviour. The policy will be publicised using the Council's intranet site.
- 6.5 All managers will be expected to take note of their responsibilities in relation to allegations and protecting whistleblowers from any adverse treatment. Where appropriate, management should seek advice from HR and/or Legal Services.
- 6.6 The responsibility for ensuring that the Council adheres to this policy rests with all managers, who have an obligation to support and encourage staff to speak out, to protect them from detriment and to take action where staff are subjected to any disadvantage relating to whistleblowing.

How will the policy be monitored?

- 6.7 The Council has a responsibility for registering the nature of all concerns raised and to record the outcome. The Head of Audit & Management Assurance (in liaison with Human Resources) will produce an annual report to the Audit and Governance Committee in respect of the number, type and outcomes reported of whistleblowing allegations.

How long will disclosure records be kept?

- 6.8 Staff disciplinary cases - see Human Resources Retention & Destruction schedule and liaise with HR Business Partner.
- 6.9 Internal Audit investigations - 3 years.
- 6.10 Proven cases following a criminal investigation - see Government guidance paragraph 5.

7 SUPPORTING INFORMATION

- 7.1 Individuals who have major concerns arising from their employment may wish to seek advice from their union or the whistleblowing charity [Protect](#) (020 3117 2520), to see whether the information which they wish to report would meet the definition of a ‘qualifying disclosure’ and whether they should be using this procedure, or an alternative.
- 7.2 The Department for Business, Energy and Industrial Strategy has published [‘Whistleblowing: Guidance for Employers and Code of Practice’](#).

8 FURTHER INFORMATION AND EVIDENCE

Consultees

The following individuals/groups have been consulted during this year’s evolution of this policy:

Internal Audit
Statutory Officers Group
Head of Human Resources

Equalities Impact Assessment

Assessment date	Reviewed as part of this years’ evolution. Assessment by the Service Unit Equality Champion has not identified any qualities impacts from the changes made this financial year. Updated EIA assessment as per Appendix 3.
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Document Control

Approval body	Audit & Governance Committee
Approval date	26 February 2026
V1 December 2018	New Policy created (please note any version changes in the future will be shown in red text)
V2 March 2020	Policy annual review. Some minor changes made including reformatting to BCP corporate formatting and changed “Department for Business Innovation and Skills”, to “Department for Business, Energy and Industrial Strategy”.
V2021 March 2021	Policy annual review. Several links and Adults safeguarding contact details updated. Added section in relation to the Council acting as a prescribed person. Added links to templates for initial response and outcome confirmation to the whistleblower. Appended updated EIA screening tool.
V2022 March 2022	Policy annual review. Added various areas following review against ISO37002 Whistleblowing Management Systems including; impact of not reporting wrongdoing, retention of disclosure records, requesting feedback from the whistleblower, breaches of a whistleblower’s confidentiality or anonymity process, assessing the risk of detriment to the whistleblower, and ensuring timely response to the disclosure. Clarified Policy primary purpose to deal with protected disclosures relating to Council business. Clarified process regarding safeguarding concerns (Children’s or Adults) raised by an employee. Other minor wording changes and updated links and contact details.

V2023 March 2023	Policy annual review. Update to a Children's safeguarding contact number and reference to a section of Employment Rights Act legislation. Some minor amendments made to Appendix 1 Seven Stage Whistleblowing Policy to clarify the process. Outcome template letter amended to ask for receipt confirmation and to advise that feedback will be sought. Repeated in Section 6 'How Is This Policy Implemented' the process to follow if the individual is dissatisfied with the outcome response or the process followed.
V2024 March 2024	Section 4 'What is Expected from the Whistleblower' para 4.3 - added the seriousness/impact of a person knowingly making a false accusation and added note to explain that a whistleblowing referral will not affect the investigation into a theft/fraud/disciplinary/employment dispute investigation. Added Protect reference and website link (was previously Public Concern at Work). Appendix 1 Seven Stage Whistleblowing Procedure - added allocation of a unique reference number. Stage 3 of Whistleblowing Procedure - Initial Response (Preliminary Enquires) – moved wording for checking of relevance to the policy, added additional potential outcomes of 'no further action' and 'identified that the concern was frivolous or malicious and disciplinary action maybe required', also included reference to a formal decision record being kept.
V2025 February 2025	Policy annual review. No changes required other than version control.
V2026 February 2026	Policy annual review. Updated Academy Trust Handbook link and summary guidance. Officer Decision Record template added to the policy.

SEVEN STAGE WHISTLEBLOWING PROCEDURE

The individual does not need to declare their disclosure as a “Disclosure in the Public Interest” for it to be acted upon. Management must be aware of their responsibilities in identifying and reporting the disclosure in line with this policy.

When making a disclosure, give as much information as possible about:

- The nature of the problem
- The background (with dates if possible)
- Who is involved
- The reasons you are concerned

Every qualifying disclosure must be notified immediately to the HAMA who will keep a log and register the details including allocating a unique reference number (the HAMA can be contacted via email: nigel.stannard@bcpcouncil.gov.uk or via telephone: 01202 128784. In each instance, when the matter is resolved, the HAMA must be notified promptly, and the register will be updated. If the allegation is without foundation or resolved informally, the register will reflect this, but it is crucial that a record is maintained of all allegations for transparency and audit purposes.

Stage 1 – Informal Resolution

In some situations, the issue may be resolved without the need for a major investigation. If an individual is aware or concerned about misconduct or wrongdoing taking place inside the organisation that he or she thinks may damage or undermine the interests of the wider public they are advised in the first instance to share the details with their line manager or Service Director, who in consultation with the HAMA will see if it can be resolved without following the formal resolution stages of this policy.

The applicable line manager and HAMA will decide on the basis of the information provided how the matter can be resolved including assessing the risk of detriment to the whistleblower. This may include informal resolution or formal consideration. The outcome will be explained to the whistleblower and it may be agreed to end the process at this point. Move to straight to stage 6 if no formal resolution is deemed necessary.

Stage 2 – Formal Resolution

If the individual feels unable to discuss their concerns with their line manager or Service Director or does not accept that the response at the informal resolution stage is sufficient or believes that senior management is involved in the matter of concern, more formal resolution will be required. The HAMA, Monitoring Officer or the Head of Paid Service should be contacted.

If the allegation concerns one or more of these officers, the disclosure may be made to the Council’s External Auditors or any another relevant [prescribed person or body](#).

It should be noted that a qualifying individual making disclosures to a prescribed person, such as an industry regulator, must reasonably believe that the matter falls within the regulator's area of responsibility and that the information and any allegations contained in it are substantially true.

At this stage, the person making the disclosure (the 'whistleblower'), will be asked whether he or she wishes their identity to be disclosed and will be reassured regarding protection from possible reprisals or victimisation.

He or she may also be asked to consider making a written or verbal statement. In the latter case, a summary of the interview will be made which will be agreed by both parties.

Details of the disclosure will be considered by the HAMA, or the Monitoring Officer or the Head of Paid Service or his/her representative, including any recommendations for further action.

Stage 3 – Initial Response for a Formal Resolution

The HAMA, Monitoring Officer or the Head of Paid Service or representative who has received the disclosure will take any urgent action they deem necessary and then decide how to respond to the disclosure, having regard to all the circumstances, including the evidence available. Preliminary inquiries will be made to establish the nature of the issue, the relevance to this policy, and how best to respond in the public interest.

Depending on the nature of the issue raised and the findings of the preliminary enquiry, the response, in the judgement of the HAMA, Monitoring Officer or the Head of Paid Service will decide whether one or more of the following courses of action is appropriate:

- a management investigation in consultation with HR and Legal Services;
- a disciplinary investigation in accordance with the Council's policies;
- a referral for consideration under other procedures;
- a referral to the Police;
- a referral to the External Auditor;
- an independent investigation;
- amendment of procedures;
- preliminary enquiry identifies that no further action is required
- no action due to lack of sufficient evidence; or
- preliminary enquiry identifies that the concern was frivolous or malicious and disciplinary action may be required

A formal decision record ([template below](#)) will be created by the HAMA, Monitoring Officer or Head of Paid Service outlining which of the courses of action above will be taken. This decision record will include the rationale and factors considered.

The whistleblower will be notified of the intended response to the disclosure in a timely manner (usually within one calendar month) and the reasons for it. The template letters below are available as a guide but other forms of written communication, such as embedding similar content in an email, may be more suitable in certain circumstances. The timeframes for an initial response to a formal disclosure will depend on the nature and complexity of the concern raised.

Move straight to stage 6 if no form of investigation is deemed necessary.

Stage 4 – Investigation

Where the decision has been made to carry out an investigation, a manager or other person will be appointed as the investigating officer.

He or she will agree terms of reference with the HAMA, Monitoring Officer or the Head of Paid Service or relevant representative and identify a provisional date when the investigation should be completed by. The investigation will be carried out observing the strictest confidentiality. The investigation is essentially a 'fact finding' exercise, to establish the facts and determine what further action may be necessary and make recommendations accordingly. A report will be produced detailing the findings and recommendations for review by the HAMA.

The investigating officer will have regard to the human rights of any individuals affected by the investigation. The investigation may also serve as the information gathering part of the Council's disciplinary procedures. In such cases this will be made clear to any people who may be subject to such investigation and any right to be accompanied will be made clear.

Normal support arrangements - e.g. counselling/unions/HR - will be available as required, to the whistleblower, any person accused of being involved in, or having concealed, wrong-doing and any others affected.

Stage 5 – Responding to the Investigation

The HAMA, Monitoring Officer or the Head of Paid Service or representative will decide whether any further action is necessary as a result of the investigation report and recommendations. If the result of the investigation is that there is a case to be answered by any individual, the relevant Council policy or procedure will be followed.

The amount of contact between the officers considering the issues and the employee raising the concern will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information may be sought from the person raising the concern.

The Council will take all steps to ensure that the whistleblower suffers no reprisals or victimisation as required by the Public Interest and Disclosure legislation.

Stage 6 – Confirmation of the Outcome

So far as legally possible and subject to rights of confidentiality, the whistleblower will be informed of the outcome of the response to the disclosure (stage 1 & 3) or the outcome of any investigation (stages 4 & 5) and how the matter has been resolved. The template letters below are available as a guide but other forms of written communication, such as embedding similar content in an email, may be more suitable in certain circumstances. In consultation with the whistleblower any ongoing protection measures will be agreed. If the whistleblower is dissatisfied with this response, they should put their concern in writing to the Chief Executive and request that the investigation is reviewed.

Stage 7 – Lessons learnt in consultation with the whistleblower

The HAMA, Monitoring Officer or the Head of Paid Service or representative will collect feedback from the whistleblower where this is practical and if the whistleblower is willing to do so.

BCP Council Whistleblowing Procedure Stage 3 – Preliminary Enquiry Decision Record - Ref <reference number>

The BCP Council Whistleblowing Procedure Stage 3 – Initial Response for a Formal Resolution states:

Stage 3 – Response for a Formal Resolution

The Head of Audit and Management Assurance (HAMA), Monitoring Officer (MO) or the Head of Paid Service or representative who has received the disclosure will take any urgent action they deem necessary and then decide how to respond to the disclosure, having regard to all the circumstances, including the evidence available. Preliminary inquiries will be made to establish the nature of the issue and how best to respond in the public interest.

Depending on the nature of the issue raised and the findings of the preliminary enquiry, the response, in the judgement of the HAMA, Monitoring Officer or the Head of Paid Service will decide whether one or more of the following courses of action is appropriate:

- a management investigation in consultation with HR and Legal Services;
- a disciplinary investigation in accordance with the Council's policies;
- a referral for consideration under other procedures;
- a referral to the Police;
- a referral to the External Auditor;
- an independent investigation;
- amendment of procedures;
- preliminary enquiry identifies that no further action is required
- no action due to lack of sufficient evidence; or
- preliminary enquiry identifies that the concern was frivolous or malicious and disciplinary action may be required

A formal decision record will be created by the HAMA, Monitoring Officer or Head of Paid Service outlining which of the courses of action above will be taken. This decision record will include the rationale and factors considered.

The whistleblower will be notified of the intended response to the disclosure in a timely manner (usually within one calendar month) and the reasons for it. The template letters below are available as a guide but other forms of written communication, such as embedding similar content in an email, may be more suitable in certain circumstances. The timeframes for an initial response to a formal disclosure will depend on the nature and complexity of the concern raised.

Move straight to Stage 6 if no form of investigation is deemed necessary.

As a reminder to the decision making, the law states:

The law – what is whistleblowing?

'Blowing the whistle' occurs when a person raises a concern about past, present or imminent wrongdoing, or an attempt to cover up wrongdoing, in an organisation or a body of people. To attract the legal protection, the information disclosed must be in the public interest, broadly meaning that the issue must affect people at large in some way. In BCP Council context, this might include, for example organisations (DLUHC, NHS, suppliers etc), colleagues or the general public. Personal grievances and individual complaints that only impact the individual making the complaint are not usually covered by whistleblowing law. BCP Council has separate procedures for making such a complaint.

The law – what protections exist for whistleblowers?

The Public Interest Disclosure Act 1998 (PIDA) protects whistleblowers from detrimental treatment by their employer (amending the Employment Rights Act 1996) as a result of making a public interest disclosure. To be counted as a public interest disclosure / “whistleblowing” disclosure, information must be disclosed; it is not sufficient to gather information or threaten to make a disclosure. The individual reporting must reasonably believe that the information relates to one of six categories listed in PIDA:

- commission of a criminal offence
- failure to comply with a legal obligation
- a miscarriage of justice
- danger to the health and safety of any individual
- damage to the environment
- the deliberate concealment of information falling within any of these categories.

A public interest disclosure must be made in the public interest (see above). It will not be a public interest disclosure if the person making the disclosure commits an offence by making the disclosure. A public interest disclosure must be made to certain people (e.g. the employer) in order to attract statutory protection; this requirement is covered in detail in the BCP Council Whistleblowing Policy.

Brief summary of the case requiring a Stage 3 decision:

<Summary of the whistleblowing referral>

Summary of the preliminary enquiries leading to the decision:

<Summary of preliminary enquiries and proposed outcome>

Decision

<Summary of the rationale and factors considered in forming the decision>

Stage 3 Decision maker and consultees:

NOTE: must be one of the following officers: Head of Audit & Management Assurance, Monitoring Officer, Head of Paid Service, or representative who has received the disclosure.

<enter decision maker name/job title>

<enter names/job titles of consultees>

Date of decision: *<enter date>*

Recommendations

<enter proposed actions/recommendations>

<electronic signature of decision maker>

Date: *<enter date>*

Service / Team
Address Line 1
Address Line 2
Town / City Postcode



Mr/Mrs

Date: (Insert date)

Address Line 1

Our Ref: 000000000000

Address Line 2

Contact:

Town

Email: (Insert Council email address)

Postcode

Tel: (Insert work telephone address)

Draft letter to Employee (Whistleblower) confirming how matter will be progressed

Dear

Reporting of concern under Whistleblowing Procedure

I am writing to confirm acknowledgement of the concerns you have raised under the Council's Whistleblowing Procedure (available on the Council's Intranet) and to outline how the matter will be taken forward.

Firstly, thank you for raising concerns. It is important for employees to bring forward any issues of concern which could damage public trust and confidence in the services provided by the Council.

After initial consideration of the issues that you have raised, I have made the decision that. **Either:** a) the concerns you have raised fall more properly within the Council's Grievance Policy (or some other policy) (copy attached), and if you wish to take the matter further you should follow the process outlined in that document. **Explain reasons**

You can seek support from a member of the HR Team who will be able to talk through the process with you. (Insert name and contact) Or b) I believe that your complaint warrants a formal investigation. **Provide further details, e.g. Management investigation, Internal Audit investigation, Police referral, referral to regulatory body**

I will act as the Designated Officer in this case / It has been agreed that (Name & Role) to be the Designated Officer in this case. (delete as appropriate)

If you are asked to attend a meeting as part of the investigation you may of course be accompanied by either a Trade Union representative or workplace colleague.

It is anticipated that it will take (insert indicative timescales) before I can advise you of progress. You will be contacted by (insert details)

I/Designated Officer will keep you informed. Once the investigation is complete I/Designated Officer write to you and confirm the outcomes of the investigation into the concerns you have raised.

In the meantime, if you require any support you should contact (Name & Role)
The Council will treat this matter confidentially in accordance with the terms of the Whistleblowing Policy.

If you have any queries about the contents of this letter, please let me know.

Yours sincerely,
(Insert title)

Service / Team
Address Line 1
Address Line 2
Town / City Postcode



Mr/Mrs

Date: (Insert date)

Address Line 1

Our Ref: 000000000000

Address Line 2

Contact:

Town

Email: (Insert Council email address)

Postcode

Tel: (Insert work telephone address)

Draft letter to Employee (Whistleblower) confirming outcome of concerns

A meeting with person who has raised concerns may take place to advise them of the outcome. In this case, the letter should be confirmation of what was discussed at that meeting.

Dear

Outcome of Investigation into concerns raised under Council's Whistleblowing Policy

I refer to the concerns you raised under the Council's Whistleblowing Policy on (insert date). I am writing to confirm the outcome of the management investigation that took place.

Conclusions of the Investigation

The principal conclusions of the investigation were as follows:

- Either the full findings of the investigation report or a summary of the findings may be listed here.
- If the concern was unfounded, this needs to be made clear with reasons.

As a result of this investigation, the following action has been taken:

- Describe changes (if any) in operational practice
- (Where relevant) The (employee in question) has been formally counselled about their role in this matter, and the situation will be closely monitored to ensure no reoccurrence in the future
- (Where relevant) the (employee in question) has been dealt with under the Disciplinary/Capability Policy and:

I would like to thank you again for bringing this matter to our attention.

I trust you feel that this has been dealt with satisfactorily. If you are dissatisfied with this response or the process that has been followed, in accordance with the Whistleblowing Policy, you can put your concern in writing to the Chief Executive and request that the investigation is reviewed. You may also seek advice from Protect (previously Public Concern at Work) who can be contacted on 020 3117 2520.

Please confirm receipt of this communication. I will be in touch subsequently to seek any feedback to assist with lessons learned from the process (Stage 7 of the Whistleblowing Policy).

If applicable - Should you wish, we can arrange a meeting to discuss the contents of this letter, please contact me on (insert details)

Yours sincerely

Senior Manager overseeing investigation.

IN YEAR MINOR AMENDMENTS AND EDITING LOG

The Chief Finance Officer has primary responsibility for developing, maintaining, and implementing the Whistleblowing Policy. Where changes affect the powers or responsibilities of councillors approval of the Audit & Governance Committee is required.

It is recognised there may be a need to clarify or update certain elements of the Whistleblowing Policy from time to time, this may require minor amendments or editing. The Chief Finance Officer (CFO) has delegated to the Head of Audit & Management Assurance (HAMA) the ability to make minor amendments and editing changes. Any such changes will be logged in the table below.

Date	Description of amendments or editing	Page

Equality Impact Assessment: conversation screening tool

Policy/Service under development/review:	Whistleblowing Policy
What changes are being made to the policy/service?	Annual policy refresh, including updating the Academy Trust Handbook link and summary guidance as well as adding the Officer Decision Record template.
Service Unit:	Finance
Persons present in the conversation and their role/experience in the service:	Chief Internal Auditor Service Equality Champion
Conversation dates:	26/01/2026
Do you know your current or potential client base? Who are the key stakeholders?	Key stakeholders are <ul style="list-style-type: none"> • any person who is currently employed by Bournemouth, Christchurch and Poole Council • Elected or Co-Opted councillors; and • Any other individual who undertakes activities on behalf of the Council including for example, volunteers, partners, contractors, etc. It should be noted that whistleblowing allegations are not commonplace – in 2024/25, there were only 3, with 3 received in 2025/26 to date.
Do different groups have different needs or experiences in relation to the policy/service?	All protected characteristics have been considered, and no different needs or experiences have been identified as a result of these updates.
Will the policy or service change affect any of these service users?	No as these changes apply equally to all key stakeholders
What are the benefits or positive impacts of the policy/service change on current or potential service users?	None identified
What are the negative impacts of the policy/service change on current or potential service users?	There is the potential for claims of discrimination to arise depending on which whistleblowing claims are investigated internally, which are referred onward and which have no action taken.
Will the policy or service change affect employees?	Yes, as this policy applies to all BCP Council employees
Will the policy or service change affect the wider community?	No, as this policy only affects the key stakeholders identified above
What mitigating actions are planned or already in place for those negatively affected by the policy/service change?	All officers are required to undergo equalities training as part of their mandatory training, which includes training on unconscious bias. As such, this reduces the chance of any potential discrimination. Additionally a decision record is made of the reasons whether to take a whistleblowing

	<p>allegation forward or not, and these decisions are often made in consultation with the CFO, Monitoring Officer or Chief Executive depending on the nature of the allegation.</p>
<p>Summary of Equality Implications:</p>	<p>The policy itself does not impact on any protected characteristics, but the potential exists for claims of discrimination depending on the outcome of the preliminary enquiry into the disclosure.</p> <p>Training is carried out to ensure that officers are aware of potential discrimination, both direct and indirect, which mitigates this risk.</p> <p>No equalities impacts have been identified as a result of the changes made this financial year.</p>