

SHILDON TOWN COUNCIL

Disclosure (Whistleblowing) Policy

1. Introduction

- 1.1 Employees are often the first to realise that there may be something seriously wrong within their organisation. However they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to their employer. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report a suspicion of malpractice.
- 1.2 The Council is committed to the highest possible standards of openness, probity and accountability in the conduct of its affairs. In line with this commitment the Council encourages employees and others with serious concerns about any aspect of the conduct of the Council's activities to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that employees can do so without fear of reprisals and is intended to encourage and enable employees to raise serious concerns within the Council rather than overlooking a problem or simply reporting it outside of the organisation. The policy should be read in conjunction with any existing Employee Code of Conduct.

2. Aims and Scope of the Policy

- 2.1 This policy aims to:
 - provide avenues for employees to raise concerns and receive feedback on any action taken
 - allow employees to take the matter further if they are dissatisfied with the Council's response
 - reassure employees that they will be protected from any form of reprisal or victimisation for 'whistleblowing' in good faith
- 2.2 There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This policy is intended to cover concerns that fall outside the scope of other existing procedures. These concerns may relate to acts that are:
 - unlawful
 - against the Council's procedures or policies

4. How to raise a concern

- 4.1 As a first step, employees should normally raise their concerns with their supervisor dependent upon the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For instance, if the employee believes that their supervisor is involved employees should raise their concerns with the Town Clerk.
- 4.2 Concerns are better raised in writing. Employees are asked to set out the background and history of the concern, giving names, dates and places where possible and the reason why the employee is particularly concerned about the situation. If the employee does not feel able to put the concern in writing then the employee may simply telephone or alternatively request a personal meeting.
- 4.3 The earlier concerns are expressed, the earlier action may be taken. Employees may also wish to involve their Trade Union representative at an early stage. Indeed employees may request their Trade Union to raise a matter of concern on their behalf.
- 4.4 Whilst employees are not expected to prove the allegation, they will need to demonstrate that there are sufficient grounds for the concern.

5. How the Council will respond

- 5.1 The action taken by the Council will depend upon the nature of the concern and matters raised may be:
 - investigated internally
 - referred to the Police
 - referred to the external auditor
- 5.2 In order to protect individuals and the Council, initial enquiries will be undertaken to determine whether or not a full investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures will normally be referred for consideration under the relevant procedure.
- 5.3 Some concerns may be resolved without the need for a full investigation.
- 5.4 Within 10 working days of a concern being raised, the employee will be provided with:
 - an acknowledgement of receipt of the concern

- the Standards Board

If an employee takes the matter outside the Council care will need to be exercised with regard to the disclosure of confidential information.

7. The Responsible Officer

The Town Clerk has overall responsibility for the maintenance and operation of this policy and will retain a record of all concerns raised and the outcome in a form that does not compromise any confidentiality that has been requested.

In addition the Town Clerk will periodically review the policy in the light of new legislation or revised national guidance.