

WHISTLEBLOWING POLICY

POLICY ON HANDLING PROTECTED DISCLOSURES UNDER THE PUBLIC INTEREST DISCLOSURE ACT

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We will on request produce this policy / procedure, or parts of it, in other languages and formats, in order that everyone can use and comment upon its content.

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DOCUMENT CONTROL

Changes History

Issue No	Date	Amended By	Summary of Changes
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Authorisation (Responsible Owner)

Role	Name	Approval Date
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Approval (Accountable Owner)

Role	Name	Approval Date
Executive Director of Corporate Services & Deputy Chief Executive	Stephen Meah-Sims	22 October 2024

Reviewers

Role & Review Responsibilities	Name	Approval Date
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About this Policy

This policy is not applicable to members of the public.

If you are a member of the public and you wish to raise a concern, you can do this by contacting our Customer Service Team: [Contact Customer Service - Suffolk County Council](#)

This policy sets out the County Council's position on those situations where members of staff and others want to tell us about things that they are worried that the Council is doing wrong

Regardless of the law, the Council's position is that we want to know if something is going wrong, so please tell us.

The Council guarantees that it will never treat anyone unfairly as a result of them sharing their genuinely held concerns with it.

This policy tells you how, in addition to the Council's guarantees, the Public Interest Disclosure Act protects employees and other staff who make a protected disclosure about a matter of concern.

This policy sets out what to do if staff or others have concerns about certain improper or unlawful activities covered by the Public Interest Disclosure Act.

The policy also signposts those procedures the Council will use in receiving, handling, and investigating disclosures and tells anyone wishing to make a disclosure the best way of going about it.

If you have concerns NOT covered by this policy, we still want to hear them. The Council has processes for dealing with crime against the Council, mistreatment of staff and others and inefficient working practices. Any Designated Whistleblowing Specialist can give you further information about this.

If you have any questions about this policy or the processes involved, please contact the Whistleblowing Lead or any Designated Whistleblowing Specialist for advice and assistance.

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1. INTRODUCTION

- 1.1. This policy aims to enable and encourage workers to raise concerns within the County Council. It recognises a worker's legal rights to make a protected disclosure to certain prescribed persons or bodies under the Public Interest Disclosure Act (PIDA) 1998 and any subsequent legislation, as incorporated into the Employment Rights Act 1996.
- 1.2. Whilst this policy applies to disclosures from workers, the Council also commits to deal with disclosures from members of the public in the same way. To this end, where this policy makes reference to a "whistleblower", it refers to both employees and members of the public who make a disclosure. If you are a member of the public and you wish to raise a concern, you can do this by contacting our Customer Service Team: Contact Customer Service - Suffolk County Council
- 1.3. Suffolk County Council (SCC) is committed to the highest standards of openness, propriety and integrity, and to providing a safe, supportive, open, and honest working environment. If you work for (or with) SCC, it is important to us that you feel confident and able to raise any concerns that you may have.
- 1.4. It is our aim to continue improving the services we provide, how we conduct our business, and the safety and wellbeing of all those within the workplace. We therefore consider the open and honest raising of concerns to be essential in meeting the Council's strategic goals, uncovering, or preventing wrongdoing and how we function.
- 1.5. You may be concerned about unlawful conduct, financial malpractice or dangers to the environment, employees and other Council workers, the public or the Council's reputation. As such, you are encouraged to come forward and voice those concerns. The Council recognises that staff, and those working with us, are often the first to realise that there may be something seriously wrong within an organisation.
- 1.6. It is important to the Council that any misconduct, fraud or wrongdoing by workers or officers of the organisation is reported and properly dealt with. The Council is committed to tackle malpractice and wrongdoing. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. If any cases of wrongdoing are upheld, they will be seriously dealt with.
- 1.7. The Council encourages workers to use internal mechanisms for reporting malpractice or illegal acts or omissions by employees or ex-employees. Concerns will always be listened to and investigated appropriately. The Council will never tolerate or support any mistreatment of those who raise genuine concerns.
- 1.8. We believe that anyone who raises any type of concern about work that they believe to be true should be treated with respect and should not suffer as a result.

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It is natural to feel uncomfortable about raising concerns at work, especially if there is fear of reprisal from those responsible for the malpractice. You may be worried about negativity from peers, your concerns not being taken seriously, or suffering recriminations such as bullying, harassment or even losing your job.

- 1.9. The Council will not tolerate harassment and victimisation of anyone raising a concern, or any attempts to bully a person into not making a report, and there should be no impact on the continued employment and opportunities for future promotion or training of anyone raising a concern. Any such behaviour is a serious breach of the Council's values and, if upheld following investigation, will result in disciplinary action potentially leading to dismissal.
- 1.10. The Council will ensure that they have appointed and trained an appropriate number of specialists who are able to receive disclosures from workers and provide them with advice and support ('Designated Whistleblowing Specialists', see appendix 1).
- 1.11. The County Councils Leadership will:
 - lead and re-enforce a culture which promotes openness and transparency.
 - lead a coordinated, efficient response, ensuring that concerns are fully investigated.
 - ensure that action is taken on any findings and any lessons are shared and learned.
 - provide assurance that those who raise concerns are reassured and that the policy has been followed.
- 1.12. All managers must be aware of, and follow, this policy to ensure that they may deal with disclosures appropriately.
- 1.13. This policy will be available to all staff on the Council's intranet so that they are aware of whistleblowing law and know how to use this policy. From time to time, communications will be provided to all staff to remind them of this policy.
- 1.14. All cases will be dealt with in a non-discriminatory and consistent way and in accordance with SCC's equality, diversity, and inclusion (EDI) guidance.
- 1.15. This policy complies with the Public Interest Disclosure Act (PIDA) 1998.

2. WHAT IS WHISTLEBLOWING AND WHAT IS COVERED?

- 2.1. Whistleblowing is the term used to describe the disclosure of information about suspected wrongdoing or dangers identified at work.
- 2.2. This policy has been prepared in response to the Employments Rights Act 1996

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and the Public Interest Disclosure Act 1998 which provide a framework for raising genuine concerns and providing guarantees of full protection to employees and other Council workers who raise such issues.

- 2.3. This policy applies to all individuals who could find themselves in a position of economic vulnerability if retaliatory measures occur as a consequence of reporting a concern. This includes staff, councillors, former staff, temporary and casual staff, agency workers, volunteers, trainees, self-employed persons providing services, freelance workers, contractors, subcontractors and suppliers. This policy uses the term **worker** to encompass all the above.
- 2.4. A member of the public will be anybody not falling within the definition of 'workers', which could include a governor in a school maintained by the council, the parent of a child at a school, or any person who uses Suffolk County Council services.
- 2.5. Individuals working in maintained schools should raise their concerns with the school using the school's own whistleblowing policy and reporting arrangements. However, If the worker has a concern which they feel cannot be discussed with the management of the school or, have good reason to consider that their complaint or disclosure will not be properly handled, then they may report their concerns direct to the County Council or the appropriate prescribed person or body.
- 2.6. For the purpose of this policy, whistleblowing is the passing on of information by a worker about wrongdoing at work in the statutory categories set out in the Public Interest Disclosure Act. Passing on of such information is called a **protected disclosure** and the person making the disclosure is called a **whistleblower**.
- 2.7. The **statutory categories** for wrongdoing are:
- any criminal offence (such as bribery, fraud or theft)
 - a breach of any legal obligation
 - a miscarriage of justice
 - endangering an individual's health and safety
 - damage to the environment
 - deliberate concealment of information about any of the above.
- 2.8. The following are examples (and not an exhaustive list) of issues that may be raised (note that, as per paragraph 2.11, there are other policies under which some of these issues may be raised and / or investigated):
- health & safety risks
 - sexual or physical abuse of both employees and clients
 - abuse of children and vulnerable adults
 - concerns around modern slavery
 - damage to the environment
 - theft or abuse of Council property
 - possible fraud and corruption

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- a breach of our internal policies and procedures (including our Code of Conduct)
- conduct likely to damage our reputation or financial wellbeing
- unauthorised disclosure of confidential information
- negligence
- actions which are intended to conceal any of the above.

2.9. To be a protected disclosure, the following additional conditions must also be fulfilled:

- The person making the disclosure must be an employee or other Council worker as defined in paragraph 2.3.
- The disclosure must be made lawfully and without breaching legal professional privilege.
- It must be made in the public interest.
- The person making the disclosure must not act maliciously or make false allegations; and
- The person making the disclosure must not seek any personal gain for it (where a disclosure has been made to a third party) such as financial payments, gifts or any other benefit or advantage.

2.10. If you are a member of a professional body, you may have a professional duty to report a concern. **If in doubt, please raise it.**

2.11. In some cases, a protected disclosure will be investigated under a separate policy of the Council, where appropriate. For example:

- If you have a complaint about your treatment at work, our **grievance policy** (including harassment and bullying) should be used. For help or advice, you could approach someone in your line of management, the Council's human resources team, a union representative or your professional body
- We have an Anti-Fraud & Corruption Policy. This includes the requirement to inform the Head of Internal Audit & Counter Fraud of any suspected fraud or irregularity affecting our assets.
- Concerns about money laundering should be raised in accordance with our Anti-Money Laundering Policy.
- If your concerns relate to child protection or adult care safeguarding, then there are separate reporting procedures via our Multi-Agency Safeguarding Hub.
- If your concerns relate to modern slavery, you can refer to the Council's webpage on [Modern Slavery](#) on how to report any concerns.
- Any issues, concerns or complaints of a health and safety nature should be reported using our incident report forms (employees only).
- Complaints of misconduct by County Councillors are dealt with under a separate procedure and should be reported to the Monitoring Officer.

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- This policy complements but does not replace the Council's procedures for internal and external complaints.

- 2.12. To tell us about inefficient business practice, you should speak first to your line manager (if you are not satisfied with the outcome, you may approach any relevant member of the Corporate Leadership Team).
- 2.13. If a worker is unsure of the correct route to take, advice is available from their line manager, from a Designated Whistleblowing Specialist (see appendix 1) or from an external advice body (see appendix 2).
- 2.14. In order to raise the concern, a worker should have reasonable belief that wrongdoing is being, has been, or is likely to be committed. However, it is not necessary to have proof or certain knowledge. The whistleblower has no responsibility for investigating the wrongdoing and **MUST NOT** do so. It is the Council's responsibility to investigate reported wrongdoings.
- 2.15. A member of staff who makes a protected disclosure has the right in law not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure. This includes cases where the subsequent investigation into the concern did not identify wrongdoing.
- 2.16. The Council recognises that any so-called 'gagging' or confidentiality clauses in settlement agreements or non-disclosure agreements with individuals do not prevent workers from making disclosures in the public interest and are void in such circumstances.
- 2.17. The Council recognises that employees may feel nervous when reporting concerns in line with this policy and are happy for them to be supported by a colleague when going through the process.

3. ROLES & RESPONSIBILITIES

Workers

- 3.1. People who work for or alongside an organisation are often the first to know about any unlawful activities or abuse of law and are, therefore, in a privileged position to inform those who can address the problem.
- 3.2. This policy is designed to show workers that they will be protected if they report an issue in good faith. Workers should report wrongdoing in line with this policy. As public servants, and as those working alongside a local authority, it is not acceptable for workers to ignore wrongdoing.
- 3.3. The Council directs all staff to cooperate fully with any whistleblowing investigation. Except insofar as the law allows a person not to self-incriminate, failure to cooperate is likely to amount to misconduct which would lead to a disciplinary

investigation.

Line Managers

3.4. Line managers are responsible for:

- ensuring all workers are aware of this policy and procedure and their responsibilities
- accurately recording in writing any whistleblowing concerns raised to them, and reporting those concerns promptly to the Whistleblowing Lead
- investigating issues, but only when asked to do so by the Whistleblowing Lead
- fostering an open culture within their teams
- ensuring any whistleblower is not subject to detriment.

Whistleblowing Lead

3.5. The Whistleblowing Lead has lead responsibility for the whistleblowing procedure and for dealing with issues raised. If the Whistleblowing Lead is unavailable for any reason, a Deputy Whistleblowing Lead will fulfil the following responsibilities. The Whistleblowing Lead will:

- oversee and review the whistleblowing policy and procedure
- provide advice and support to managers and employees
- ensure learning from whistleblowing cases is fed back to the wider organisation
- designate a competent and impartial person or department to investigate any reported issues promptly and thoroughly
- follow up any reported concerns
- ensure managers are only asked to investigate matters if they have been trained in dealing with such issues
- inform the Chief Executive of any findings of wrongdoing and the actions being taken
- ensure the process is monitored and improved where required.

Designated Whistleblowing Specialists

3.6. Appendix 1 lists all those appointed as Designated Whistleblowing Specialists. These specialists will act as an independent and impartial source of advice to workers at any stage of raising a concern. They will:

- treat the concern confidentially unless otherwise agreed
- ensure the worker receives timely support to progress their concern
- escalate to senior management any indications that a whistleblower is being subjected to detriment for raising their concern
- remind the organisation of the need to give the whistleblower timely

feedback on how their concern is being dealt with; and

- advise the whistleblower on how to access personal support, as it is recognised that raising such a concern may be stressful.

4. RAISING A CONCERN

- 4.1 For the effective detection and prevention of improper acts or omissions, it is vital that the relevant information reaches swiftly those closest to the source of the problem, most able to investigate and with powers to remedy it, where possible. For that reason, workers are encouraged to raise any concerns internally if appropriate to do so.
- 4.2 Initially, current (and former) staff should raise any concern with their immediate line manager (most recent line manager for former staff). Workers who are not directly employed by the council may raise a concern with the relevant County Council manager for the area the worker has been involved in. This does depend, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If a worker believes that their management is involved, or are uncertain who to contact, they should approach any Designated Whistleblowing Specialist.
- 4.3 Workers should raise concerns at the earliest opportunity once there is reasonable belief that an issue exists or could exist in the future so that timely action can be taken.
- 4.4 Workers may raise concerns in person by meeting with a relevant manager or any of the Designated Whistleblowing Specialists, or in writing by post or email to a relevant manager, to any of the Designated Whistleblowing Specialists, or to the Council's Whistleblowing email address.
- 4.5 If a worker needs advice and guidance on how matters of concern may be raised or pursued, please contact any of the Designated Whistleblowing Specialists or write to the Council's Whistleblowing email address.

Whistleblowing email address

whistleblowing@suffolk.gov.uk

- 4.6 To engage protection as a whistleblower, workers should have reasonable grounds to believe, in light of the circumstances and the information available to them at the time of reporting, that the matters reported by them are true. **Appendix 3 gives a visual guide on how to report a concern and the initial steps that will be taken.**

4.7 If a worker does not feel able to raise a concern internally, they may choose to raise concerns in the public interest externally with 'prescribed bodies'. These are listed in section 6. Before deciding to do this, workers should be aware when making an external report that to qualify for the protections available under the Public Interest Disclosure Act, additional conditions need to be met.

4.8

If the disclosure is made to:

- **the employer** it must arise from a reasonable suspicion that the alleged malpractice has occurred, is occurring or is likely to occur;
- **a regulator i.e. Health and Safety Executive**, in addition it must be honestly and reasonably believed that the information and any allegations contained are substantially true;
- **other bodies (Police, media, MP etc.)**, in addition to the tests for regulatory disclosure, no personal gain will be made from the disclosure; and
- in all circumstances, that it is reasonable for the disclosure to be made.

If the disclosure is made to **other bodies**, further preconditions apply. It must be:

- reasonably believed that they would be victimised if the matter were raised internally;
- reasonably believed that the disclosure related to a criminal offence;
- the case that there is no prescribed regulator, and it was believed that relevant information would be concealed or destroyed;
- that the concern has already been raised with the employer or regulator; or
- that the concern is of an "exceptionally serious" nature.

5. HOW WHISTLEBLOWING REPORTS ARE DEALT WITH

5.1 When a worker makes a protected disclosure, the person it is reported to ('the receiving officer') will consult with the Whistleblowing Lead, or if unavailable a Deputy Whistleblowing Lead.

5.2 Protected disclosures must always be noted in writing by the receiving officer, who will **pass the details to the Whistleblowing Lead within 24 hours**. In cases where there is an immediate and serious risk disclosed, the receiving officer will

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contact the Whistleblowing Lead by telephone straight away, or a Deputy Whistleblowing Lead if the Whistleblowing Lead is unavailable.

- 5.3 The Whistleblowing Lead will nominate a competent and impartial person to investigate any reported issues promptly.
- 5.4 To protect individuals and the Council, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle, which the Council will have in mind, is the **public interest**. Concerns raised or allegations made which fall within the scope of other specific procedures (for example, harassment or discrimination issues; allegations of fraud) will normally be referred for consideration under those policies. Regardless of the actions taken by the Council, whistleblowers will be protected by this policy and the law for all valid concerns they raise, even if these are subsequently determined to not be in the public interest or to be honest 'mistakes of fact' in reporting.
- 5.5 The person nominated to undertake initial enquiries will contact the reporting person **within seven days** of the disclosure to confirm receipt of the report and provide details of what will happen next.
- 5.6 If the Whistleblowing Lead believes it is appropriate so to do, they may advise the Chief Executive or other senior officer of the nature (and, in some cases, the content) of the disclosure. **Any person being so informed is bound by a strict duty of confidentiality and must not discuss the disclosure with any other person or organisation without the consent of the Whistleblowing Lead.**
- 5.7 Following initial enquiries by an impartial person the Council will respond to the concern, as appropriate. The action taken by the Council will depend on the nature of the concern. At the sole discretion of the Whistleblowing Lead, the matters disclosed may be:
- investigated by the Council's Internal Audit and Corporate Fraud Service (where fraud is implied);
 - investigated by a Designated Whistleblowing Specialist;
 - investigated by another appropriate person (either from within or outside the Council);
 - referred to the police or the external auditor;
 - referred to two or more of these (to work together on the investigation); or
 - form the subject of an independent inquiry.
- 5.8 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any detailed investigation is concluded.
- 5.9 If the investigation is internal to, or under the control of, the Council, the investigating officer nominated by the Whistleblowing Lead will maintain communication with the whistleblower and provide feedback. Wherever possible

they will:

- indicate how the Council proposes to deal with the matter. (Where appropriate follow-up is still being determined, providing an estimate of when the whistleblower can expect this feedback);
- give an estimate of how long it will take to provide a final response (normally this should not exceed three months; however complex cases may require a longer timescale);
- advise whether any initial enquiries have been made;
- advise whether further investigations will take place, and if not, explain this decision; and
- indicate how the Council will proceed where the informant has chosen to remain anonymous.

5.10 The amount of contact between the officers considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If further contact is needed, it will be made in a way which does not arouse suspicion in the workplace. The whistleblower will normally be asked to suggest a method of contact that they feel comfortable with.

5.11 When any meeting is arranged with an employee or other Council worker, they have the right, if they so wish, to be accompanied by a trade union or professional association representative or a workplace colleague who is not involved in the area of work to which the concern relates. The measures for the protection of whistleblowers set out in this policy also apply, as far as is relevant, to those involved in supporting the whistleblower.

5.12 The Council will take steps to minimise any difficulties which whistleblowers may experience as a result of raising a concern. For instance, if whistleblowers are required to give evidence in criminal or disciplinary proceedings, advice about the procedure and support will be given.

5.13 If the investigation is internal to, or under the control of, the Council, the investigating officer nominated by the Whistleblowing Lead will detail the outcome of the investigation in a written report. The report will outline the findings of the investigations and reasons for the judgement made. This report is owned by the Whistleblowing Lead who will determine distribution.

5.14 Where an investigation identifies governance, risk management or internal control failures, the Whistleblowing Lead may supplement the whistleblowing investigation by commissioning a separate Internal Audit review.

5.15 The Council recognises that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to any legal constraints, whistleblowers raising a concern will receive information about the outcome of any investigation.

6. REPORTING CONCERNS TO EXTERNAL BODIES

- 6.1 This policy is intended to provide a route by which members of staff and others can raise concerns internally.
- 6.2 If a worker does not feel able to raise their concern internally, they may choose to raise concerns externally with **‘prescribed persons or bodies’**. Details are provided in section 4 about the additional requirements for gaining the protections available under the Public Interest Disclosure Act if reports are made other than to the Council. If a whistleblower does take the matter outside the Council, they should be careful not to disclose confidential information, and ensure that they comply with the requirements of the Public Interest Disclosure Act so that they do not lose the protection of the Act against dismissal or other detriment.
- 6.3 If a whistleblower has reported a matter internally but is not satisfied that the concern has been properly dealt with, they should first raise it with the Whistleblowing Lead. If still unsatisfied and it is necessary and in the public interest, the whistleblower may also consider raising concerns externally to **prescribed persons or bodies**.
- 6.4 The full list of prescribed persons and bodies can be found on the UK government website at [Whistleblowing: list of prescribed people and bodies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-list-of-prescribed-people-and-bodies) . This includes:
- ✓ HM Revenue & Customs
 - ✓ the Comptroller and Auditor General
 - ✓ the Director of the Serious Fraud Office
 - ✓ the Children’s Commissioner for England
 - ✓ the Care Quality Commission
 - ✓ the Information Commissioner
 - ✓ the Equality and Human Rights Commission
 - ✓ the Health and Safety Executive
 - ✓ the Environment Agency
- 6.5 If, instead of going to a prescribed person a worker chooses to make a disclosure to an **‘other body’**, such as the media or a Member of Parliament (MP) they should note that further conditions (set out in the table under paragraph 4.8) apply.
- 6.6 Note: those who receive payment for a disclosure (which may be especially relevant in dealings with the media) are unlikely to receive the protections discussed in this policy.

7. CONFIDENTIALITY & ANONYMITY

- 7.1 Workers may be concerned about reporting their concerns, notwithstanding the guarantees made by the Council and provided by law. That is why we want to reiterate how seriously we take those concerns and our commitment to protecting our whistleblowers.
- 7.2 As far as it is possible to do so, the Council will not reveal the identity of any whistleblower to the subject of the disclosure or to any other person or body that is not involved in the investigative process. **All Line Managers and Designated Whistleblowing Specialists must keep details of whistleblowing reports and the person who made them confidential.**
- 7.3 In the exceedingly unlikely circumstance that the Council considers it might be appropriate to disclose a whistleblowers identity to anyone not involved in investigating the concern, the designated investigating officer would **ALWAYS** discuss this with the whistleblower first and make sure protective measures were put in place and the reason for considering a disclosure was clearly explained.
- 7.4 Sometimes (if, for example, the Council was to discipline or prosecute someone) there might need to be a hearing, and the whistleblower might be required to give evidence. If this were to happen, the council would take all reasonable steps to protect the identity of the whistleblower (such as screened or pre-recorded evidence, when available) but, on occasion, the Council might be required to disclose their identity.
- 7.5 The council asks that whistleblowers give us a name when making a protected disclosure. There are reasons for this:
1. We want to make sure that we can look after you and protect your rights, and it's harder for us to do this if we don't know who you are.
 2. When you make a disclosure, you will tell us what you think we need to know but, in our experience, whistleblowers often know other things that they don't realise are important to the investigation. If you were to accidentally omit a key detail when making a report, we may not properly understand what it is that you are telling us about and, therefore, not be able to investigate your concern properly. This is why the appointed investigator would like to be able to contact you, if they have any questions.
 3. Sometimes the nature of a protected disclosure is such that, rather than an investigation (or prior to an investigation) immediate action could be taken; we would often want to agree this with you.
 4. At the end of the investigation, we'd like to be able to tell you (as far as the law allows us to) of the outcome and the steps we've taken or are going to take. Sometimes we might want to discuss a proposed course of action with you before taking it.
- 7.6 Potential whistleblowers should be aware that the protection of confidentiality may not apply where an individual intentionally reveals his or her identity in the context

of a public disclosure.

- 7.7 Although the Council encourages whistleblowers to provide contact details, a worker is still able to raise a concern anonymously. However, workers should be aware that if concerns are reported anonymously, they may find it harder to argue that any subsequent unfair treatment was as a result of the whistleblowing.
- 7.8 The Council suggests a whistleblower wishing to remain anonymous should consider using an anonymous email account so that the Council can respond and communicate details of the investigation. Anonymous whistleblowers may wish to keep copies of all correspondence to demonstrate that a concern was raised.

8. PROTECTION FOR WHISTLEBLOWERS

- 8.1 The Public Interest Disclosure Act 1998 (PIDA) governs whistleblowing. PIDA protects workers against dismissal or other penalties as a result of making a 'protected disclosure'.
- 8.2 If a concern (by a worker) is raised in the reasonable belief that it is in the public interest and procedures have been followed correctly, the discloser raising the concern will be protected by the terms of this policy and, where applicable, by whistleblowing legislation. Where a discloser has been victimised for raising a concern, the Council will take appropriate action against those responsible, in line with the Council's disciplinary policy and procedures.
- 8.3 Any disclosure of information received from a worker in relation to section two of this policy is likely to be considered a "Protected Disclosure". This means that workers who disclose information to the Council or a prescribed person or body in relation to the types of wrongdoing in section two above are protected by law. They will not be at risk of losing their job or suffering any form of reprisal as a result, so long as:
- The worker making the disclosure has reason to believe the information provided is true.
 - The worker does not do so for personal gain.

It does not matter if you are mistaken or if there is an innocent explanation for your concerns.

- 8.4 The Council does not tolerate bullying, harassment or victimisation in any form, including to those who raise a concern in connection with the provisions of this policy. Furthermore, we will not tolerate any attempt to bully a worker into not raising any such concern. The council's Grievance Policy is in place to deal with this type of behaviour. We consider behaviour of this nature to be a breach of our values and will take the appropriate action against those who fail to meet our behavioural requirements.

- 8.5 Whistleblowing laws provide the right for a worker to take a case to an employment tribunal if they have been victimised at work or lost their job because they have 'blown the whistle'. If you believe you have suffered a detriment for raising a concern under this policy, you should report this to any of the persons listed in appendix A.

9. HOW THE MATTER CAN BE TAKEN FURTHER

- 9.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 9.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the key contacts in appendix 1. Alternatively, you may contact the Chairman of the Audit Committee or our external auditors.

10. TRAINING & PROMOTION

- 10.1 The provisions of this policy will be promoted throughout the Council and where appropriate, training and advice will be provided at all levels to those charged with dealing with and investigating whistleblowing concerns.
- 10.2 This policy will also be made available to all those the council does business with and published on the Council's external website.

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APPENDIX 1 – Designated Whistleblowing Specialists

In addition to approaching your line manager, you may raise concerns with a senior manager in the Council. You may prefer to speak to a **Designated Whistleblowing Specialist**.

The Council has appointed the following **Designated Whistleblowing Specialists**:

Name	Whistleblowing Role
Nigel Inniss , Assistant Director of Governance, Legal & Assurance, and Monitoring Officer Email: nigel.inniss@suffolk.gov.uk Phone: 01473 264236	Whistleblowing Lead and Designated Whistleblowing Specialist
Polly Mann , Legal Services Manager & Deputy Monitoring Officer Email: polly.mann@suffolk.gov.uk Phone: 01473 264241	Deputy Whistleblowing Lead and Designated Whistleblowing Specialist
Mickaela Green , Legal Services Manager & Deputy Monitoring Officer Email: mickaela.green@suffolk.gov.uk Phone: 01473 264241	Deputy Whistleblowing Lead and Designated Whistleblowing Specialist
Peter Frost , Head of Internal Audit & Counter Fraud Email: peter.frost@suffolk.gov.uk Phone: 01473 264247	Deputy Whistleblowing Lead and Designated Whistleblowing Specialist
Christos Constantinou , Counter Fraud Manager Email: christos.constantinou@suffolk.gov.uk Phone: 01473 265887	Deputy Whistleblowing Lead and Designated Whistleblowing Specialist
Nicola Beach , Chief Executive Email: nicola.beach@suffolk.gov.uk Phone: 01473 264001	Designated Whistleblowing Specialist
Stephen Meah-Sims , Executive Director of Corporate Services & Deputy Chief Executive Email: stephen.meah-sims@suffolk.gov.uk Phone: 01473 263512	Designated Whistleblowing Specialist
Louise Aynsley , Chief Financial (S151) Officer Email: louise.aynsley@suffolk.gov.uk Phone: 01473 265651	Designated Whistleblowing Specialist
Jeanette Bray , Assistant Director of Human Resources & Organisation Development Email: jeanette.bray@suffolk.gov.uk	Designated Whistleblowing Specialist

Phone: 01473 264985

APPENDIX 2 – Support and Advice

The **Designated Whistleblowing Specialists** are trained in how to support you, but we understand that you might like to seek advice or support from someone else before, during or after making a report.

These are some other sources available.

Ernst & Young LLP (External Auditors)

Website: [EY - UK | Building a better working world](https://ey.com/uk)

Email: DHanson@uk.ey.com

Protect

Website: <https://protect-advice.org.uk>

Email: whistle@protect-advice.org.uk

Phone: 020 3117 2520 (* option 1)

UK Government

(UK government advice on 'Whistleblowing for employees')

Website: <https://www.gov.uk/whistleblowing>

ACAS

(ACAS guidance on 'Whistleblowing at work')

Website: [The law - Whistleblowing at work - Acas](https://www.acas.org.uk/the-law/whistleblowing-at-work)

Lifestylesupport

The Employee Assistance Programme is a free and confidential service provided by Suffolk County Council for employees and offers a range of expert advice, invaluable information, specialist counselling and support.

Phone: 0808 168 2143

Request: [Article-Search - Knowledge \(oraclecloud.com\)](https://www.oraclecloud.com)

The Comptroller and Auditor General

Website: <https://www.nao.org.uk/contact-us/whistleblowing-disclosures/>

Phone: 020 7798 7999

Police

Website: <https://www.suffolk.police.uk/contact-us/report-something>

Phone: 101

Member of Parliament

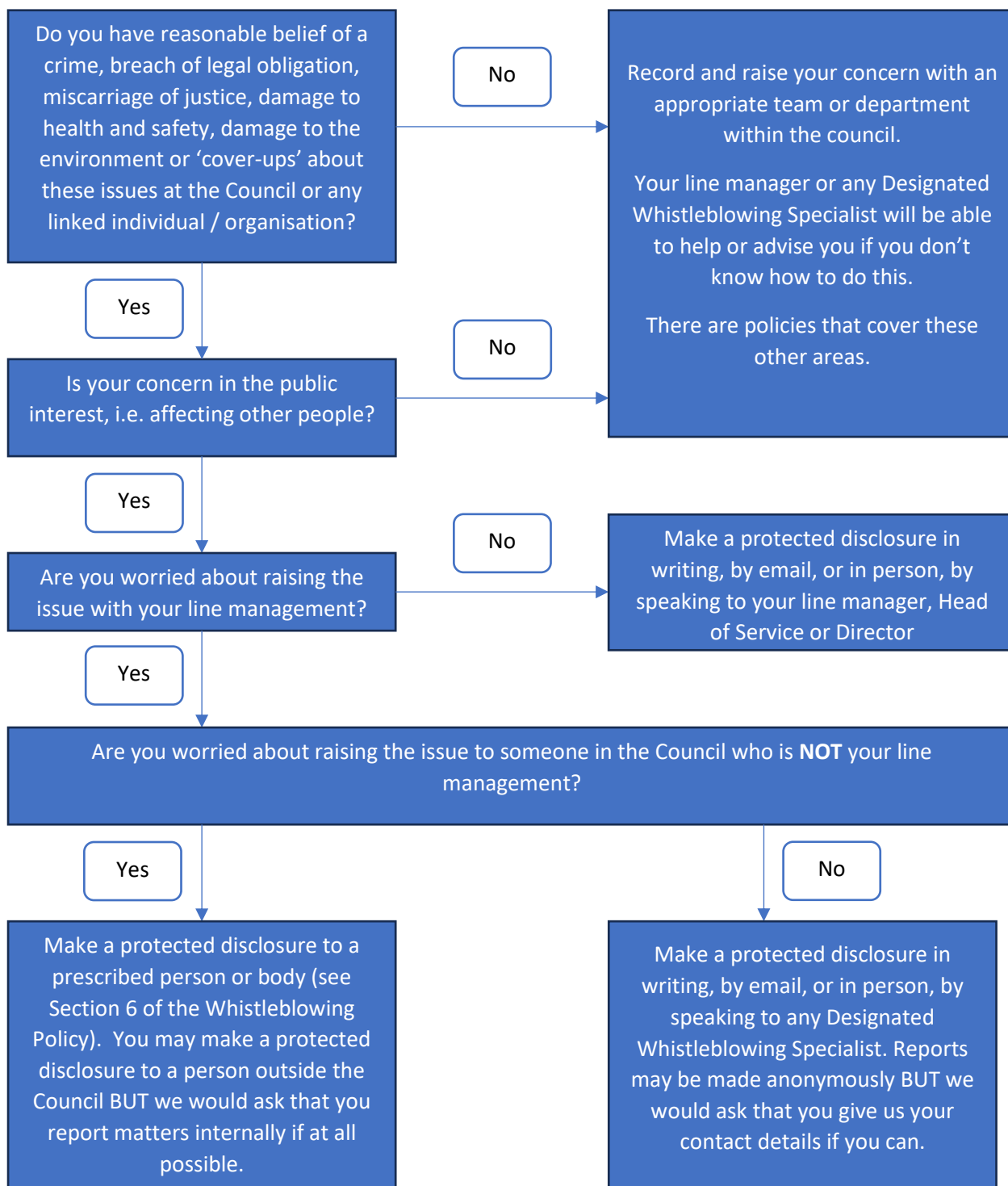
Contact details for any Member of Parliament are available online

Website: <https://members.parliament.uk/>

For a list of all Prescribed Persons for external disclosures, please visit:

Website: [Whistleblowing: list of prescribed people and bodies](#)

APPENDIX 3 – How to Report Whistleblowing



IF IN DOUBT, SEEK ADVICE BEFORE DISCLOSING ANYTHING THAT MIGHT BE CONFIDENTIAL.