

Meeting of:	Governance and Audit Committee
Date of Meeting:	Monday, 21 July 2025
Relevant Scrutiny Committee:	Resources Scrutiny Committee
Report Title:	Mid-Year Review of the Whistleblowing Policy and Reported Incidents
Purpose of Report:	To provide Governance and Audit Committee with an annual update.
Report Owner:	Victoria Davidson, Monitoring Officer/Head of Legal and Democratic Services
Responsible Officer:	Victoria Davidson, Monitoring Officer/Head of Legal and Democratic Services Tom Bowring, Director of Corporate Resources
Elected Member and Officer Consultation:	There are no matters in this report that relate to an Individual Ward
Policy Framework:	This is a matter for Executive decision by Cabinet.
<p>Executive Summary:</p> <ul style="list-style-type: none"> This report provides an update on the progress made in response to the comments and recommendations raised by members during the Committee's meeting in January 2025. Since the last report, work has been undertaken to more clearly identify emerging trends by Directorate. Consistent with previous years the highest number of reports have originated from the Environment and Housing and Social Services Directorates. A recurring theme relates to allegations of bullying, harassment and victimisation. Reinforcing the need for robust, ongoing monitoring and thematic analysis, a detailed breakdown of cases by Directorate and issue type is now included in the graphical summary within this report (Appendix A). In response to feedback regarding clarity and structure, data on reports, outcomes, and Directorate breakdowns has been reorganised and is now presented in tabular and graphical formats. This provides a clearer, more digestible overview of trends and facilitates easier comparison across time periods and service areas (Appendix B). There has been a renewed focus on capturing and reporting outcome-focused information. Where investigations have resulted in upheld or partially upheld outcomes, the Council has implemented specific changes, including: Strengthening internal procedures, particularly around supervisory oversight 	

- Improved staff training on respectful workplace practices
- Targeted disciplinary action, where appropriate
- Enhanced communication between managers and staff to resolve issues informally at an early stage
- A number of whistleblowing reports relate to ongoing cases; however, where investigations have concluded, we have started to track and report on whether individuals subject to allegations remain in post and whether reporters and staff subject to a Whistleblowing investigation which are not upheld receive appropriate support. Due to the sensitivity of this information, only anonymised and aggregated data is included in this report.
- This is in response to concerns raised about support for non-Trade Union members, aimed at reviewing support mechanisms for all whistleblowers, regardless of union affiliation. Any recommendations will inform future updates to the policy.
- The Council continues to promote the Whistleblowing Policy through internal communications and direct engagement with staff. Awareness levels have remained high, responses included in the 2025 Staff Survey which has recently closed will be considered. A summary of any relevant results from the survey will be reported in full at year-end, but reporting trends suggest continued growth in both awareness and confidence in using the Policy.
- Acknowledging concerns around delays in concluding investigations, a review of internal capacity has been undertaken. Where internal resources are insufficient or conflicts arise, external investigators continue to be commissioned. The need to improve timeliness remains a priority, and we are exploring options to support this function. Officers from Internal Audit, the CFO, Monitoring Officer, Head of Human Resources and Operational Manager Customer Relations meet monthly to triage cases with those falling outside the scope of the Whistleblowing Policy, clear signposting and handover to the relevant policy (e.g. Grievance or Disciplinary Policies) is undertaken.
- Benchmarking with Other Authorities - as requested, work is ongoing to gather comparative data from other local authorities to better understand how the Vale of Glamorgan's whistleblowing activity aligns with sector norms. Initial engagement has taken place through regional and national networks and findings will be shared with the Committee in the next update.

Recommendations

1. That the Governance and Audit Committee notes the contents of the report.
2. That the Governance and Audit Committee continue to receive annual reports in relation to policy implementation and incidents.

Reasons for Recommendations

1. &2 To ensure the effective monitoring of whistleblowing incidents and staff awareness of the Policy is undertaken.

1. Background

- 1.1 The Council's Whistleblowing Policy was first adopted in 2014 and reviewed in 2019, with a revised version adopted in 2020.
- 1.2 The Policy aims to protect employees who raise concerns about malpractice-including fraud, danger, or unethical conduct-in the public interest, in line with the Public Interest Disclosure Act 1998.
- 1.3 It applies to Council employees (excluding school-based staff employed by Governing Bodies), agency workers, contractors, trainees, and temporary staff.
- 1.4 The Policy provides a framework for "protected disclosures," ensuring staff can report concerns without fear of victimisation or dismissal.
- 1.5 Disclosures may relate to criminal activity, legal breaches, health and safety risks, environmental harm, miscarriages of justice, or the concealment of such matters.
- 1.6 The Operational Manager for Customer Relations maintains the central register of whistleblowing cases and monitors progress and outcomes.
- 1.7 Directors are responsible for implementing the Policy within their Directorates, ensuring staff awareness, manager training, and proper case handling.
- 1.8 The Governance and Audit Committee, via the Monitoring Officer, oversees the Policy. The Head of Human Resources is responsible for updates, and the Monitoring Officer reports to the Committee in confidence.
- 1.9 Since June 2022, all whistleblowing concerns have been recorded via the Granicus-Firmstep GovService platform, which tracks progress and ensures restricted access.
- 1.10 In October 2023, a promotional campaign was launched to raise awareness of the Policy and reporting tools, including a staff survey to assess knowledge, legal understanding, and willingness to report concerns.

2. Key Issues for Consideration

- 2.1** Since the last report to Committee in January 2025, the Whistleblowing Policy has continued to be actively utilised, with reporting levels broadly aligned with year-end 2024/2025. The updated data, shown in the graph below, reflects sustained staff engagement with the Speak Out mechanisms and continued confidence in the reporting process.
- 2.2** Between January and July 2025, seven reports have been received under the Whistleblowing Policy. These span multiple Directorates, with the highest number originating from Social Services and Environment and Housing—consistent with longer-term patterns identified since formal recording began in 2021.
- 2.3** A proportion of reports during this period have been assessed as falling outside the scope of the Whistleblowing Policy and were redirected to alternative procedures such as the Grievance or Disciplinary Policies. Where reports have proceeded under the Policy, the majority have not been upheld. Nevertheless, learning arising from all cases continues to inform service improvements and control measures.
- 2.4** As previously reported, previous awareness raising campaigns and staff surveys indicated increased recognition and understanding of the Policy, a trend expected to continue through 2025/26. Results from the 2025 Staff Survey, currently being analysed will inform future promotional and engagement activity,
- 2.5** Actions arising from investigations during this period include improvements to communication protocols, targeted staff training, and internal procedural reviews. Disciplinary action has also been taken where appropriate.
- 2.6** There is now a renewed focus on capturing and recording outcome-focused information for every report received, ensuring greater accountability and follow-through, two reports during 2023 and three during late 2024 and the first half of 2025. Where investigations result in upheld or partially upheld findings, outcomes are formally recorded, and actions are taken forward in consultation with HR, the relevant Chief Officer, and other Council services as appropriate to the nature of the matter.
- 2.7** A number of measures have been taken forward to strengthen health, safety, and well-being management and to address cross-cutting organisational learning, and support team well-being, action planning, and a revised risk assessment. A draft protocol is being finalised to better manage accidents, incidents, and near misses across organisations, with the aim of ensuring consistency and accountability. An induction template has been shared to promote consistent onboarding practices, and the Council's Health and Safety Officer has offered to inspect contract work where appropriate.
- 2.8** Contractual arrangements have been reviewed to ensure they reflect the specific needs of team members, particularly in relation to workplace support. This includes enhanced communication and training, clear responsibilities for on-site supervision, and improved security measures. Relevant managers have been asked to familiarise themselves with the Council's contractor management procedures to strengthen compliance. Monthly health and safety monitoring meetings are being held with external agencies, with a view to reducing their frequency as improved systems become embedded.

- 2.9** Work has also been undertaken to reinforce organisational standards and expectations. Internal discussions have taken place to clarify the responsibilities of staff under existing Council policies and procedures, with an emphasis on compliance, professional conduct, and early informal resolution where possible. A clear and transparent policy is being communicated to all staff, line managers, and Chief Officers, outlining the steps to be taken should a staff member experience discrimination on the grounds of any protected characteristic. Cultural competence training has also been delivered to support inclusive workplace behaviours.
- 2.10** To ensure appropriate case management, decisions have been made to commission independent investigators where internal capacity is limited. Timescales for investigations have been reviewed to improve timeliness and consistency. Additionally, steps have been taken to strengthen governance and minimise conflicts of interest. This includes a review of the Declaration of Personal Relationships and the Code of Conduct, with updates shared across the Council to clarify expectations where a reporting relationship may create a potential conflict.
- 2.11** All incidents are now to be reported to the Health and Safety Team using the recognised Incident Forms, with clear documentation of the actions taken. These changes collectively represent a strengthened approach to accountability, cultural improvement, and safe working practices across the organisation, while maintaining the confidentiality of individual cases.
- 2.12** In cases where allegations were not upheld, internal discussions have taken place to identify opportunities for learning. This reflective approach informed a targeted review of the Whistleblowing Policy, led by the Head of Human Resources in May 2025, alongside revisions to associated procedures including the Employee Code of Conduct.
- 2.13** Data is being collated to identify the number of employees who submitted a whistleblowing concern, and those who were subject to a whistleblowing investigation remain in the Council's employment. The Committee will receive this information in due course.
- 2.14** The Policy continues to serve as an essential mechanism for raising concerns safely and appropriately. The Council remains committed to fostering a culture of openness, accountability, and learning. Subject to Committee agreement, a further update will be provided at the end of the 2025/26 financial year.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1** The Policy provides opportunity for staff to highlight concerns regarding the way the council works, ensuring resources are used sustainably and in a way the best benefits residents.

4. Climate Change and Nature Implications

- 4.1** The Policy provides opportunity for staff to highlight concerns regarding the way in which council activities impact on the local environment.

5. Resources and Legal Considerations

Financial

- 5.1** The Policy helps ensure that Council funds and resources are used appropriately.

Employment

- 5.2** There is a resource impact in relation to the investigation and resolution of concerns raised under the Policy. The impact is borne by directorates and Internal Audit.

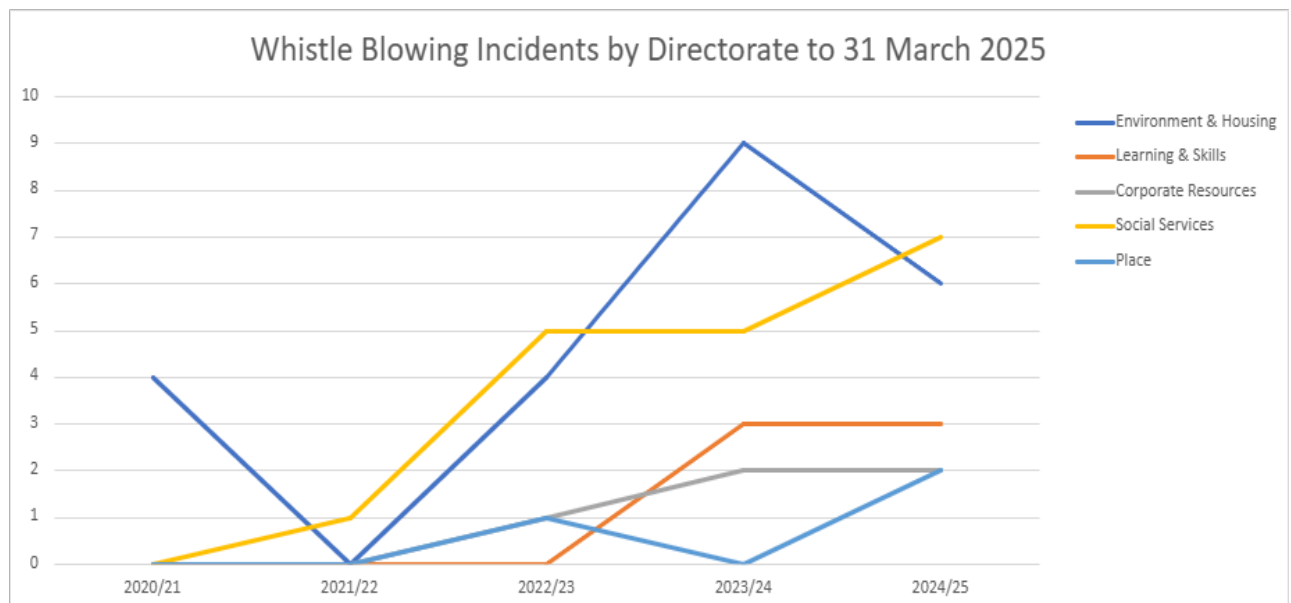
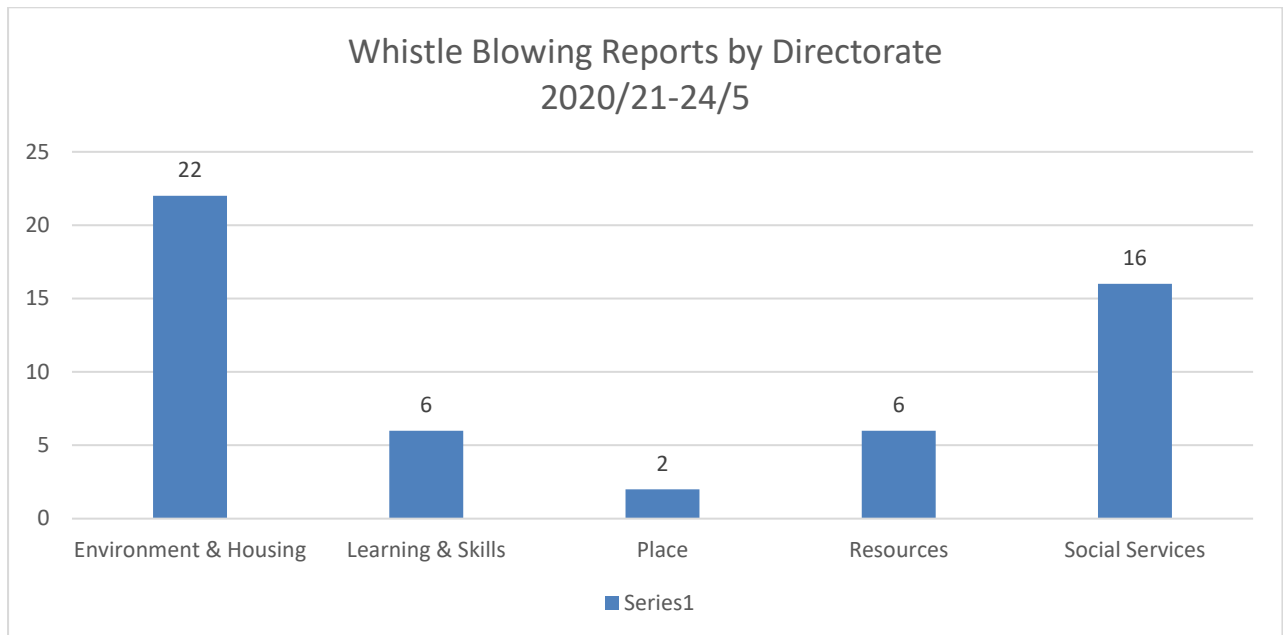
Legal (Including Equalities)

- 5.3** The Policy helps ensure that crime committed by Council employees in undertaking their duties can be detected and addressed.

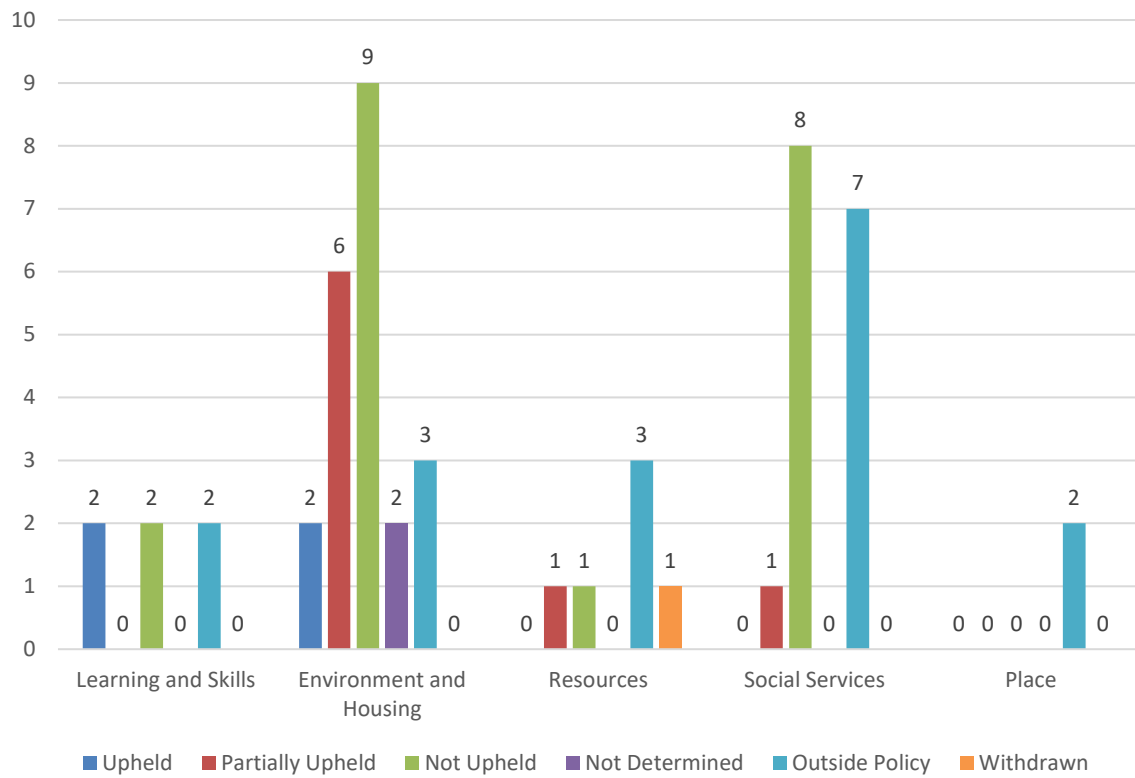
6. Background Papers

None

Appendix A – Directorate Data 2020/21 to 2024/25



Outcomes by Directorate 2020/21-24/25



Appendix B

Reports Received by Financial Year and Monthly Averages

Financial Year	Total Reports Received	Average Reports per Month
2021/22	Approx. 1	0.1
2022/23	11	0.9
2023/24	19	1.6
2024/25	21	1.75

Directorate Breakdown (Selected Years)

Directorate	2022/23	2023/24	2024/25	Total (Since 2020/21)
Environment & Housing	4	9	6	22
Social Services	5	5	8	16
Learning & Skills	0	3	6	6
Resources	1	2	2	6
Place	1	0	1	2

Table 3: Report Status (Since 2020/21)

Status	Number	Percentage
Total Reports Received	52	
Currently Under Investigation	2	4%
- Of which reported since Apr 2024	2	—
Outside Whistleblowing Policy	17	33%
Investigations Concluded	32	62%

Investigation Outcomes (from 32 Concluded Cases)

Outcome	Number	Percentage
Not Upheld	20	62%
Fully Upheld	4	13%
Partially Upheld	8	25%

No allegations were upheld or partially upheld in 2023/24. 5 were upheld in 2024/25.

Nature of Allegations – 2024/25

Type of Concern	Number of Reports
Illegal Practices (e.g. fraud, misuse of assets)	2
Failure to Meet Legal Obligations (e.g. mishandling of funds, employment disputes)	3
Health and Safety	4
Environmental Damage	0
Miscarriage of Justice	0