

Meeting of:	Governance and Audit Committee
Date of Meeting:	Monday, 20 July 2026
Relevant Scrutiny Committee:	Resources Scrutiny Committee
Item which the Chair has decided is urgent (Part I) (If yes, why)	Not applicable
Urgent Decision Procedure Used (15.14 of the Constitution) (If yes, why)	Not applicable
Item Type	Part I
Report Title:	Annual Whistleblowing (Speak Out) Policy and Reported Incidents 2025/2026
Portfolio Holder:	Executive Leader and Cabinet Member for Performance and Resources
Strategic Leadership Team:	Director of Corporate Resources
Lead Officer:	Monitoring Officer/Head of Legal and Democratic Services

1.0 What is this report about?

- 1.1 This report provides the Governance and Audit Committee with the Council's annual review of the operation of the Whistleblowing (Speak Out) Policy during 2025/26 and presents an analysis of reported concerns and emerging organisational trends.
- 1.2 The report reviews Speak Out referrals received during 2025/26 and provides contextual trend information from cases recorded since June 2022. The analysis demonstrates that employees continue to utilise the Speak Out process to raise a wide range of concerns. Whilst the nature of concerns raised has evolved over time, investigations undertaken during the reporting period resulted in relatively few allegations being substantiated. The findings therefore provide assurance regarding the effectiveness of existing governance, management and investigative arrangements.
- 1.3 During 2025/26. The majority of referrals were either not whistleblowing matters or were not upheld following investigation. One investigation is ongoing at year end. The findings provide

assurance that concerns are being properly considered through established governance arrangements while also supporting continuous organisational improvement and learning.

1.4 The report also considers trends by Directorate, identifies key organisational learning and outlines actions taken in response to concerns raised, including policy reviews, management interventions, training and improvements to governance arrangements.

1.5 The Council remains committed to fostering a culture of openness, accountability and continuous improvement where employees feel able to raise concerns safely and in the public interest.

2.0 What are the Recommendations?

	Recommendations – What and How?	Reason for Recommendation – Why?
2.1	That the Governance and Audit Committee notes the contents of this report and the analysis of Speak Out reports received during the reporting period.	To enable the Committee to fulfil its governance and oversight responsibilities in relation to the operation of the Whistleblowing Policy.
2.2	That the Governance and Audit Committee continues to receive annual reports regarding implementation of the Whistleblowing (Speak Out) Policy and reported incidents.	To ensure ongoing monitoring of whistleblowing activity, trends, organisational risks and lessons learned.

3.0 What is the background to this report?

3.1 The Council's Whistleblowing Policy was originally adopted in 2014 and subsequently reviewed in 2019, with revised version implemented in 2020.

3.2 The Policy provides a mechanism through which employees and other eligible persons can raise concerns regarding wrongdoing, malpractice, fraud, corruption, health and safety risks, safeguarding matters, breaches of statutory obligations and other matters of public interest.

3.3 The Policy seeks to ensure that concerns can be raised without fear of victimisation, retaliation, or detriment and supports compliance with the Public Interest Disclosure Act 1998.

3.4 Responsibility for maintaining the central register of whistleblowing concerns rests with the Operational Manager Customer Relations. Governance and Audit Committee exercises oversight of the Policy through reports submitted by the Monitoring Officer.

3.5 Since June 2022 all whistleblowing concerns have been recorded through the Council's electronic case management system, enabling improved recording, monitoring and thematic analysis.

3.6 The Committee received previous reports in January 2025 and July 2025 and requested further analysis recording trends, outcomes, Directorate level reporting and organisation learning.

4.0 What issues are there to be considered?

4.1 During the period July 2025 to July 2026, 13 referrals were received through the Speak Out process.

4.2 Of the 13 referrals received:

- 4 were recorded as whistleblowing concerns under the Council's Speak Out Policy.
- 9 were determined to fall outside the scope of the Whistleblowing Policy and were therefore managed through alternative procedures or service management arrangements.

This demonstrates that established triage arrangements continue to ensure concerns are assessed and directed through the most appropriate process

4.3 Of the cases concluded during the reporting period:

- All referrals subject to an investigation were not upheld
- One matter was considered through the Council's quality assurance and provider assurance processes. The review concluded in November 2025, with no substantive provider performance concerns identified and appropriate assurance measures completed.
- One matter was referred to an external body for consideration.

This relatively low number of substantiated concerns provides assurance that allegations raised through the Speak Out process are being appropriately examined and managed through established governance arrangements.

4.4 Analysis of historical data since June 2022 indicates that the nature of concerns being raised has evolved over time. Earlier referrals were more commonly associated with allegations relating to fraud, procurement, governance and misuse of resources, whilst more recent referrals increasingly relate to workplace behaviours.

4.5 Whilst concerns relating to workplace behaviours are being raised more frequently than in previous years, investigations have rarely substantiated such allegations. The increase in

reporting may therefore reflect greater awareness of reporting mechanisms and confidence in raising concerns rather than evidence of systemic organisation issues.

4.6 Concerns raised through the Speak Out process continue to provide valuable intelligence regarding areas where additional communication, management support, policy clarification or training may be beneficial. Even where allegations are not upheld issues raised can contribute to organisation learning and service improvement

4.7 Traditional whistleblowing concerns, including fraud, conflicts of interest, procurement matters and misuse of resources, continue to be reported but represent a smaller proportion of overall referrals than in earlier years.

4.8 Health and Safety, safeguarding and governance concerns continue to arise periodically across the organisation and remain an important component of the Speak Out framework. Where concerns have been identified, management actions have been implemented to strengthen compliance, awareness and assurance arrangements.

4.9 Analysis by Directorate indicates that concerns raised generally reflect the nature of operational activity undertaken within those services. Care should be taken when comparing the volume of referrals between Directorates, as workforces vary significantly in size and operational complexity.

4.10 Since central recording arrangements commenced in June 2022, referrals have been received across all Directorates. Higher numbers of referrals should not automatically be interpreted as higher levels of wrongdoing and may equally reflect workforce size, service complexity and employee confidence in reporting concerns.

4.11 The data demonstrates that employees continue to engage with the Speak Out process and utilise the reporting arrangements when concerns arise. This supports the Council's commitment to maintaining an open and transparent organisational culture.

4.12 Within Social Services, 17 referrals have been recorded since June 2022. None of the investigations were upheld and one was partially upheld. The number of referrals received within the Directorate during 2025/26 represented the lowest annual total since central recording arrangements were introduced. This suggests that whilst concerns continue to be raised and investigated appropriately, there is limited evidence of substantiated wrongdoing arising from reports received.

4.13. Within Environment and Housing, 25 whistleblowing referrals have been recorded since June 2022. Of these, 4 investigations were upheld and 5 were partially upheld, with 11 not upheld and 5 not investigated. Whilst a proportion of referrals resulted in findings that fully or partially substantiated the concerns raised, the majority of completed investigations did not identify wrongdoing. This indicates that concerns are being reported and appropriately investigated, with outcomes demonstrating the importance of maintaining effective whistleblowing arrangements to identify and address issues where they arise.

4.14 Within Learning and Skills, 9 whistleblowing referrals have been recorded since June 2022. Of these, 1 investigation was upheld, 6 were not upheld, 1 was not investigated and 1 remains under investigation. The relatively low number of upheld concerns suggests limited evidence of substantiated wrongdoing arising from referrals received to date. However, the presence of an upheld case demonstrates the continuing value of the whistleblowing process in providing a mechanism for concerns to be raised, considered and investigated where appropriate.

4.15 Within Corporate Resources, 3 whistleblowing referrals have been recorded since June 2022. All 3 investigations were concluded as not upheld. This suggests that whilst concerns have been raised and properly investigated, there has been no evidence of substantiated wrongdoing identified within the Directorate through the whistleblowing process during the reporting period. The low number of referrals may also indicate a relatively limited volume of concerns requiring formal investigation.

4.16 Within Place, 1 whistleblowing referral has been recorded since June 2022. The referral was not investigated. Given the very small number of referrals received, it is difficult to draw any meaningful conclusions regarding trends within the Directorate. However, the data indicates a low level of whistleblowing activity and no substantiated findings arising from referrals during the reporting period.

4.17 Regardless of whether concerns are ultimately upheld, partially upheld or not upheld, the Speak Out process continues to provide valuable opportunities for organisational learning and improvement. Outcomes arising from investigations and management reviews have included:

- Improved management oversight.
- Targeted management and staff training.
- Policy and procedure reviews.
- Enhanced communication arrangements.
- Health and safety improvements.
- Strengthened governance and accountability arrangements.
- Formal management action where appropriate.

4.18 Independent investigators continue to be commissioned where internal capacity is limited or where an independent investigation is considered necessary.

4.19 The evidence indicates that employees continue to have confidence in using the Speak Out process to raise concerns. The majority of concerns reported during the year were either outside the scope of the Whistleblowing Policy or were not substantiated following investigation. Nevertheless, the issues raised have supported organisational learning, strengthened governance arrangements and provided assurance that concerns can be raised and considered appropriately.

5.0 How has evidence been used to inform the report, including the views of others?

5.1 This report is informed by analysis of 51 whistleblowing cases recorded between 2022 and 2026.

- 5.2 Evidence has been drawn from the Council's central Speak Out database, investigation records, Directorate reporting and outcomes monitoring.
- 5.3 Analysis has been undertaken to identify themes, trends over time, Directorate patterns and organisational learning arising from investigations.
- 5.4 The report also reflects lessons identified through investigations undertaken by Internal Audit, Human Resources, Legal Services and independent investigators where appointed.
- 5.5 Findings from previous Governance and Audit Committee discussions have informed the enhanced reporting format and increased focus on trend analysis, organisational learning and thematic reporting.

6.0 What are the next steps if the recommendations are approved?

- 6.1 The findings within this report will continue to inform ongoing reviews of the Whistleblowing Policy and associated procedures.
- 6.2 Learning identified through investigations will be shared with Directorates to support continuous improvement and organisational learning.
- 6.3 Management actions arising from investigations will continue to be monitored and reviewed through existing governance arrangements.
- 6.4 Further work will continue to improve investigation timeliness, consistency of outcomes reporting and monitoring of organisational learning.
- 6.5 An updated annual report will be presented to Governance and Audit Committee during 2027.

7.0 How does this report support Vale 2030 and Reshaping?

- 7.1 The Whistleblowing Policy supports the Council's ambition to be an accountable, transparent and high-performing organisation.
- 7.2 The report supports the Council's commitment to tackling inequalities by promoting fair treatment, addressing discrimination and supporting inclusive workplaces.
- 7.3 The Speak Out arrangements contribute to organisational improvement by identifying risks, strengthening governance arrangements and improving service delivery.
- 7.4 The Policy supports public confidence in the Council's ability to identify and address concerns in the public interest.

8.0 How does this demonstrate the Five Ways of Working?

- 8.1 **Long-Term:** The Policy supports sustainable organisational improvement through identification of trends and systemic issues.

8.2 **Prevention:** Early reporting of concerns enables the Council to address issues before they escalate into significant operational, financial or reputational risks.

8.3 **Integration:** The Policy supports wider governance, safeguarding, equality, workforce and risk management objectives.

8.4 **Collaboration:** Investigations are supported by collaboration between Directorates, Human Resources, Legal Services, Internal Audit and external investigators where necessary.

8.5 **Involvement:** The Policy provides employees and other stakeholders with an opportunity to raise concerns and contribute to organisational learning and improvement.

Resources

9.0 Finance

9.1 The Whistleblowing Policy assists the Council in identifying potential financial risks, fraud, corruption and misuse of resources.

9.2 There are costs associated with investigations, including the commissioning of independent investigators where required. These costs are met from existing Directorate or corporate budgets.

10.0 Workforce

10.1 The Policy supports employee wellbeing by providing a mechanism through which concerns can be raised safely and confidentially.

10.2 The increasing prevalence of concerns relating to workplace culture, management behaviour and professional conduct highlights the importance of maintaining effective workforce support, training and management arrangements.

10.3 Lessons arising from investigations continue to inform organisational development and workforce initiatives.

11.0 Legal and Equalities

11.1 **Does an Equalities Impact Assessment need to be completed? If not, why?** An Equalities Impact Assessment has **not** been completed as this report is presented for information and monitoring purposes only and does not propose any new policy, service change or decision that would impact directly on protected groups.

11.2 The Policy supports compliance with the Public Interest Disclosure Act 1998 and helps ensure concerns relating to wrongdoing can be raised and investigated appropriately.

11.3 The report demonstrates the Council's commitment to addressing allegations of bullying, harassment, discrimination and victimisation, supporting its wider equality and inclusion

objectives.

12.0 **Key Contacts** Tracy Dickinson Head of HR and OD; Victoria Davidson Monitoring Officer/Head of Legal and Democratic Services; Tony Curliss Operational Manager Customer Relations.

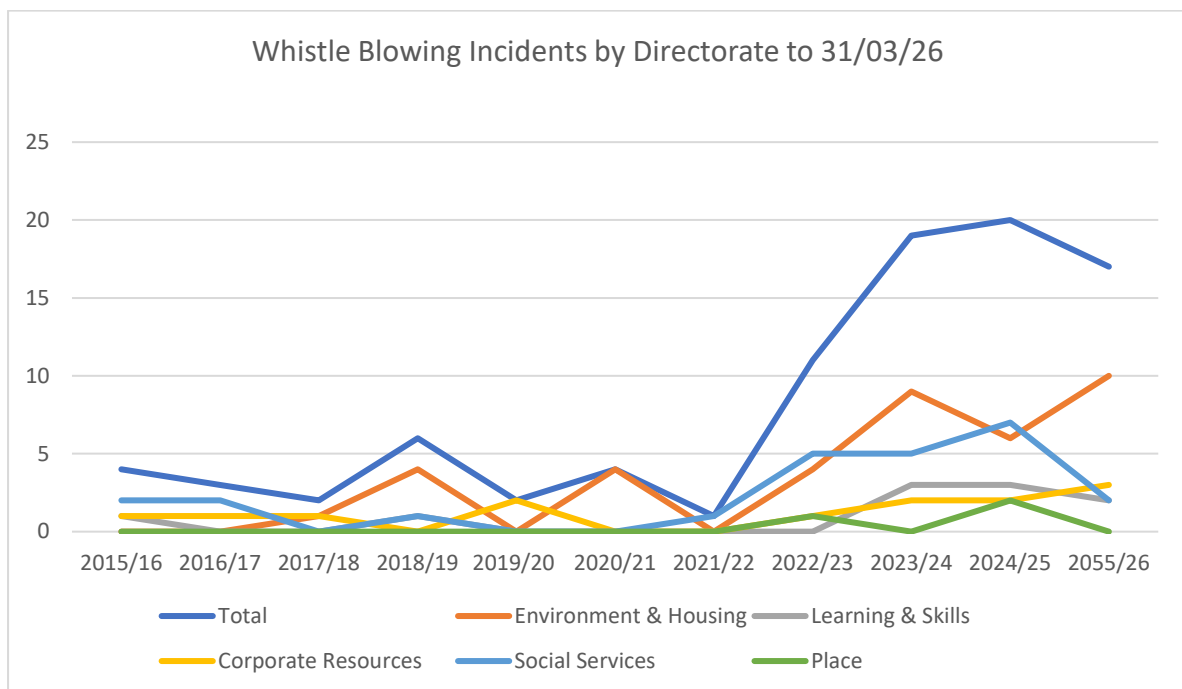
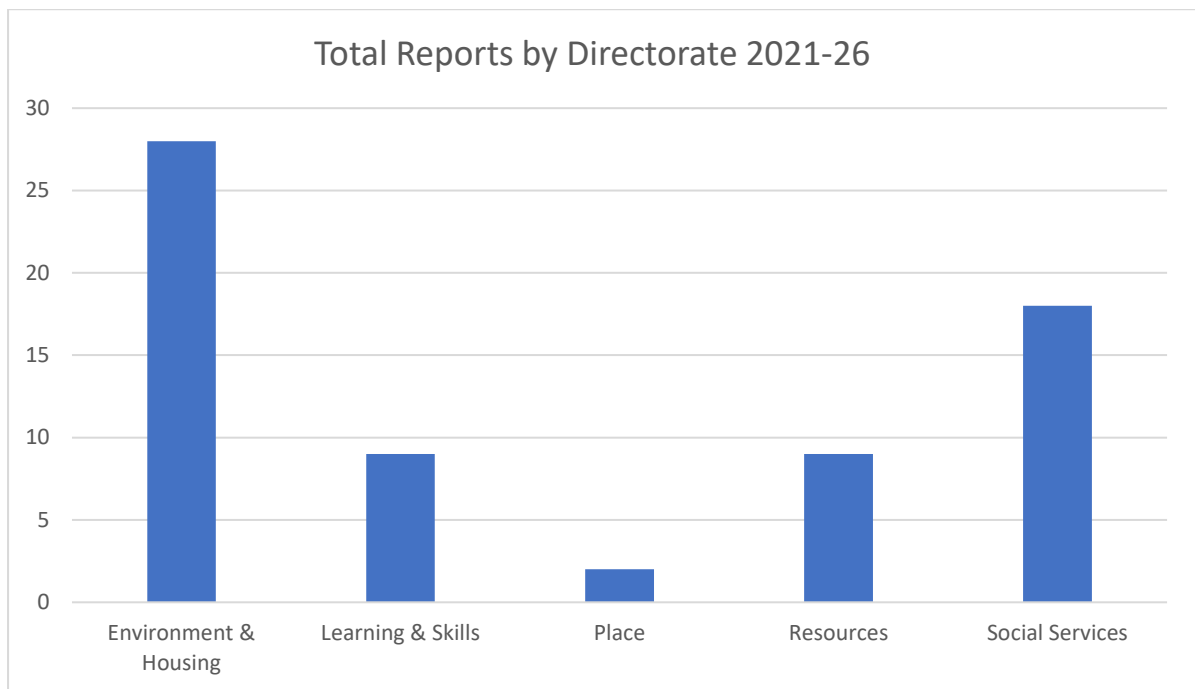
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Appendix

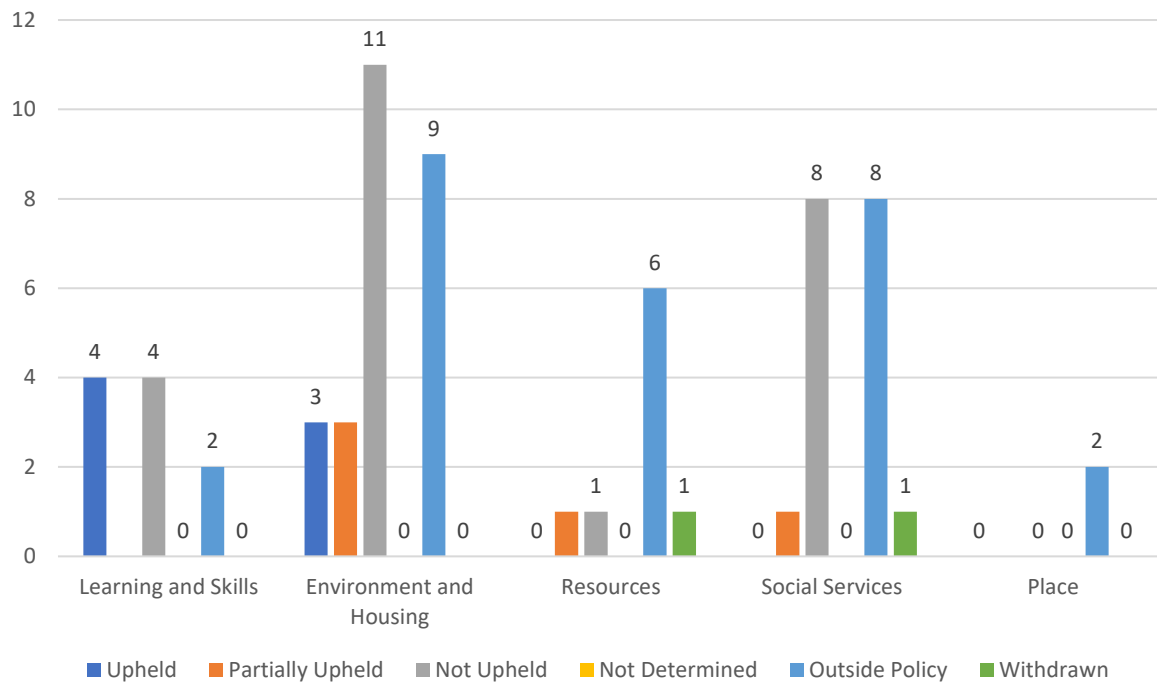
Appendix A – July 2026 Appendices

[Whistleblowing Report July 26 Appendices.docx](#)

Appendix A – Directorate data 2021/22 to 2025/26



Outcomes by Directorate 2021/22-25/26



Appendix B

Reports received by Financial Year and Monthly Averages

Financial Year	Total Reports	Monthly Average
2021/22	Approx. 1	0.1
2022/23	11	0.9
2023/24	19	1.6
2024/25	21	1.75
2025/26	17	1.42

Directorate Breakdown

Directorate	2022/23	2023/24	2024/25	2025/26	TOTAL
Environment & Housing	4	9	6	11	30
Social Services	5	5	8	2	20
Learning & Skills	0	3	6	2	11
Resources	1	2	2	2	7
Place	1	0	1	0	2