

Brighton & Hove City Council

Audit Standards & General Purposes Committee

Agenda Item 26

Subject: Interim update on the Council's Whistleblowing Arrangements

Date of meeting: 23rd September 2025

Report of: Elizabeth Culbert – Director Governance & Law

Contact Officer: Name: Victoria Simpson, Senior Lawyer – Corporate Law
Email: Victoria.Simpson@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The purpose of this report is to note the Whistleblowing referrals and outcomes received in since the Council's updated Whistleblowing Policy was approved by Committee in April 2025. This interim Report seeks to update members in advance of the forthcoming annual review, which will consider twelve months' data up to April 2026.
- 1.2 The report links directly to the Council Plan priority to be a responsive Council with well-run services. The Council has committed to listen to our customers and staff, regularly monitor performance and embed good governance throughout the organisation. A robust Whistleblowing process is a key part of ensuring this good governance.

2. Recommendations

- 2.1 That Committee notes the report, including the whistleblowing referrals and outcomes.

3. Context and background information

- 3.1 The Council has adopted the Whistleblowing Policy attached at Appendix 1. The policy seeks to enable individuals to 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. The policy commits to deal with disclosures of wrongdoing made, sets out how to raise concerns, the role of the Monitoring Officer to review disclosures and appoint investigators, the protection and support for disclosers, and the action to be taken following an investigation.

- 3.2 A visible and accessible process for raising whistleblowing concerns should function as a deterrent to malpractice, encourage openness, promote transparency, and underpin the risk management systems of the Council.
- 3.3 The Committee agreed that an Annual report will be presented to Audit, Standards and General Purposes Committee detailing the number of incidents which have been reported, including a brief summary of the nature of the issues raised in the allegation and action being taken (but without compromising anonymity in any way).
- 3.2 Whistleblowers are encouraged not to seek anonymity so that the information can be explored in detail. However, making an anonymous report (including via the Council's dedicated whistleblowing email address) remains an option. All requests for anonymity are respected unless there is a legal obligation to disclose the information.
- 3.3 To encourage the visibility and use of these processes, the Council publishes the Policy on the Wave and the Council's website and includes information on the Policy at staff inductions. Periodically the Council will undertake additional publicity to raise awareness, such as in Director's Blogs and employee payslips. In addition to the Whistleblowing Policy, the Council has adopted an anonymous reporting for employees who wish to raise individual HR matters relating to their employment.

Data on whistleblowing complaints

- 3.4 In April 2025 Members received data on the volume of whistleblowing concerns raised over the previous 5 years up to April 2025 and on the themes of those concerns. The data is replicated below for ease of reference:

Year	2020 - 21	2021- 22	2022 -23	2023 -24	2024 -25	Theme
	3	1	4	3	9	Allegations against a staff member(s)
	3	3	5	4	3	Fraud
	3	6	4	5	8	Management/ processes
		1				Other
Total	9	11	13	12	20	

- 3.5 For the period April 2025 to 31st August 2025, 10 whistleblowing referrals were received, details are set out below.

Table 1 – whistleblowing referrals received in between April 2025 - 31st August 2025

Ref no. & Date	Source	Relevant Directorate	Theme	Outcome
144 (Aug 25)	Resident	City Operations	Concern regarding external supplier.	Investigation ongoing.
145 Aug 25	Anonymous	Central Services	Concern regarding officer behaviour.	Investigation ongoing. Anticipate conclusion September 25.
143 July 25	Resident	Housing and Adult Social Care	Concern regarding Council as Landlord.	Investigation closed. Outside scope of WB Policy – matter under review by Housing and Local Government Ombudsman
142 July 25	Employee	Central Services	Concern regarding staff safety in Council Buildings with access to the public.	Investigation ongoing. Anticipated conclusion October 25.
141 June 25	Employee	Families, Children and Wellbeing	Concern regarding officer behaviour.	Investigation concluded. Recommendations made to Service.
140 May 25	Resident	Central Services	Concern regarding Council Social Media policy	Investigation concluded. Not upheld – clear, published policy in place.
139 May 25	Councillor	Central Services	Concern regarding social media post	Investigation concluded. Referred through disciplinary process and appropriate action taken.
137 May 25	Employee	City Operations	Concern regarding external supplier	Investigation completed. Recommendation for improvements to contract management process.
138 April 25	Resident	City Operations	Concern that Council complaints process not followed.	Investigation concluded. Finding that complaint appropriately dealt with internally and by Ombudsman.

Ref no. & Date	Source	Relevant Directorate	Theme	Outcome
136 April 25	Resident	Central Services	Concern regarding a Council lease	Investigation concluded. Finding that complaint had been raised and responded to fully under the Council's complaints procedure.

4. Analysis and consideration of alternative options

- 4.1 There are no consistent themes arising from the referrals made. They are spread across the Council's Directorates. There were 10 referrals made in the period April to September 2025, which aligns with the number of referrals received in the previous year (20 for a 12 month period). Where referrals are identified as outside the scope of the Policy, the complainant is informed (where they are known). In all cases where an investigation has been undertaken and a conclusion reached, the complainant (where they are known) is informed of the outcome.
- 4.2 The Council's whistleblowing arrangements are an important strand of its corporate governance framework and it is key to good governance to ensure the Policy is reviewed and kept up to date. Effective whistleblowing arrangements ensure that the Council takes seriously any issues which arise and deals with them appropriately.

5. Community engagement and consultation

- 5.1 Input was sought from key internal parties prior to the updating of the Council's Whistleblowing arrangements, however this Report is provided to members for monitoring purposes only.

6. Financial implications

- 6.1 There are no direct financial implications arising from this report. Effective whistleblowing arrangements helps strengthen the Council's control environment, assisting in protecting the Council from financial risk and loss due to unlawful or improper practices.

Name of finance officer consulted: Haley Woollard Date consulted: 10/09/25

7. Legal implications

- 7.1 The Public Interest Disclosure Act 1998 (PIDA) amended the Employment Rights Act 1996 ("the Act") to create a framework for whistleblowing across the private, public, and voluntary sectors. The Act provides individuals in the workplace with protection from victimization where they make a protected disclosure about malpractice or wrongdoing at work in accordance with the Act's provisions.

- 7.2 This Committee has delegated powers for the Council's whistleblowing arrangements, and as a result is the correct body to receive this Report.

Name of lawyer consulted: Victoria Simpson

Date consulted 20/08/25

8. Risk implications

- 8.1 A failure to maintain fit for purpose whistleblowing arrangements which are transparent and ensure confidence in the organisation's willingness to recognise and deal with serious issue, could impact adversely on the Council's discharge of any number of its key functions. That could jeopardise its management of any of its key strategic risks

9. Equalities implications

- 9.1 There are no adverse equalities implications arising from the report. An effective whistleblowing policy assists in tackling discrimination by making it easier to report allegations in confidence, via a process which provides mechanisms for identifying and remedying any failures in this/ any area.

10. Sustainability and other implications

- 10.1 No sustainability or other implications have been identified.

11. Conclusion

- 11.1 Committee is asked to note the data in this report regarding concerns raised during the period in scope. A full twelve months' data will be considered at the time of the next annual review of the Policy and its operation, in April 2026.

Supporting Documentation

Appendices

Appendix 1 Whistleblowing Policy

[Brighton & Hove City Council's Whistleblowing Policy](#)

