

**Audit Standards & General Purposes Committee**

**Subject:** Update on referrals under the Council's Whistleblowing Policy

**Date of meeting:** 21 April 2026

**Report of:** Elizabeth Culbert – Director Governance & Law

**Contact Officer:** Email: [Elizabeth.culbert@brighton-hove.gov.uk](mailto:Elizabeth.culbert@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 since the last update to Committee in September 2025.
- 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. Our Policy was updated and approved by Committee in April 2025.

**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.
- 3.5 The Committee agreed that a bi-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 September 2025 Members received an update detailing the 10 whistleblowing referrals that had been received during the previous 6 month period. Of those 10 referrals, 3 were ongoing investigations at the time of September Committee and an update regarding those referrals is provided below.

Table 1 – update on whistleblowing referrals received in between April 2025 - 31<sup>st</sup> August 2025

Ref no.	Source	Relevant Directorate	Theme	Outcome
144	Resident	City Operations	Concern regarding external supplier.	Investigation concluded. Clarification of procedures and other mitigations implemented to improve practice.
145	Anonymous	Central Services	Concern regarding officer behaviour.	Independent investigation concluded and report outcome shared. Allegations not upheld but learning shared which recognised the perceptions and experience of the whistleblower.

142	Employee	Central Services	Concern regarding staff safety in Council Buildings with access to the public.	Investigation concluded and action implemented. Additional Police support out in place in specific building which was the subject of concern. Additional management support also implemented.
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3.5 Since September 2025, a further 9 whistleblowing complaints have been referred through the Council's whistleblowing policy. These are summarised below.

Table 2 - whistleblowing referrals received in between September 2025 - 31<sup>st</sup> March 2026

Ref no.	Source	Relevant Directorate	Theme	Outcome
158	Service user	HASC	Allegation regarding suitability of accommodation and support	Investigation concluded. Appropriate support offered. Resident moved with support to alternative accommodation.
157	External third party supplier	City Operations (ICT)	Allegation that procurement exercise non compliant.	Investigation ongoing
156	Resident	Central Services	Allegation regarding safety of a building leased to a third party	Investigation concluded. Estates Team have confirmed responsibilities of the leaseholder with whistleblower and lessee.
155	External third party supplier	FCW	Allegation that procurement exercise non compliant	Investigation ongoing
154	Anonymous	HASC	Allegation regarding staff declaration of interests	Investigation concluded. No evidence of wrongdoing found.
153	Employee	City Operations	Concerns regarding a frontline service and whether	Investigation ongoing

Ref no.	Source	Relevant Directorate	Theme	Outcome
			adequately resourced	
152	Service user	HASC	Allegation regarding mishandling of support with accommodation	Investigation concluded. Complaint already investigated by LGO and concluded by them.
151	Employee	Central Services	Allegation regarding staff declaration of additional work	Investigation ongoing
150	Employee	HASC	Allegation of illegal practices by a third party supplier	Investigation concluded. No evidence of illegal practices identified.

#### **4. Analysis and consideration of alternative options**

- 4.1 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.
- 4.2 The range of referrals received indicates that the Policy is accessible and that the process to raise whistleblowing complaints functions well. The investigations are closely monitored by a core team of senior officers and progress of investigations and delivery of outcomes is generally timely. Some investigations, by their nature, do take longer than others but the core officer team keep these under close review every 6 weeks to ensure progress is being made.
- 4.3 The nature of the referrals and range of teams identified in them does not present a pattern of concerns that relate to a specific area or of a specific nature. One issue that the officer review team have identified for further action is to re-state the Council policy to all officers and managers regarding the declaration and mitigation of conflicts of interests. A clear policy is in place and it is considered that it will be beneficial to raise the profile through Senior Leadership and Managers Network, together with general all staff communications, to ensure that the policy is fully embedded and the right actions are taken to ensure potential conflicts of interests are identified, recorded and – where appropriate – mitigated.

#### **5. Community engagement and consultation**

- 5.1 Input was sought from key internal parties prior to the updating of the Council's Whistleblowing arrangements in April 2025. This Report is

provided to members for monitoring purposes only and therefore no further consultation has been undertaken.

## **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: Hayley Woollard      Date consulted  
10.04.26

## **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 victimisation 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: Elizabeth Culbert      Date consulted 10/4/26

## **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.

### **Supporting Documentation**

### **Appendices**

Appendix 1 Whistleblowing Policy