

Bradford on Avon Town Council



‘Whistle Blowing’ Policy

Version Control

Action:	Who:	Date:	Comments:
Revised Draft	Town Clerk	May 2025	
Adopted	Resources	17 th June 2025	

1. Introduction

1.1 It is important that Town Council employees are aware of the procedures to follow if they wish to draw attention to issues of serious concern. Such issues may relate either to bad practice or to other matters which seem to be against the interests of the public, the Council or its employees and may, in some cases, amount to fraud and corruption.

1.2 Employees are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to Council. They may also fear harassment or victimisation. In these circumstances, they may choose to ignore the issue.

1.3 Bradford on Avon Town Council is committed to the highest possible standards of openness, probity and accountability and encourages employees and others with serious concerns about any aspect of the Council's work to come forward and voice them. This policy ensures that employees can, without fear of reprisals, raise serious concerns within the Council rather than overlooking a problem or 'blowing the whistle' outside.

2. Aims and Scope

The policy's aim is to:

- provide avenues for Council employees to raise concerns and receive feedback on any action taken.
- allow the employee to take the matter further if they are dissatisfied with the Council's response.
- reassure the employee that they will be protected from reprisals or victimisation for 'whistleblowing' in good faith.

3. Safeguards

3.1 Harassment, Bullying or Victimisation

The Council recognises that the decision to report a concern can be difficult to make, not least because of the fear of reprisal from those responsible for the malpractice. The Council will not tolerate harassment, bullying or victimisation and will take action to protect the employee when a concern is raised in good faith. (This does not mean that if an employee is currently the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of 'whistleblowing').

3.2 Confidentiality

The Council will do everything possible to protect the identity of the employee who raises the concern should they not wish their name disclosed. However, the investigation process may reveal the source of the information and a statement by the employee may be required as evidence.

3.3 Anonymous Allegations

This policy encourages the employee to put their name to their allegation. Concerns expressed anonymously will be taken seriously but investigated at the discretion of Council.

In exercising its discretion, the Town Council will consider:

- the seriousness of the issue raised.
- the credibility of the concerns.
- the likelihood of confirming the allegation from attributable sources.

3.4 Reporting

All complaints should be reported to the Chief Executive & Town Clerk, unless the complaint relates to the Chief Executive & Town Clerk, in which case the complaints should be reported to the Deputy Town Clerk.

3.5 Untrue Allegations

If an allegation is made in good faith but is not confirmed by the investigation, no action will be taken against the employee. If, however, an employee makes malicious or vexatious allegations, disciplinary action may be taken.

4. Council's Response

4.1 The action taken by Council will depend on the nature of the concern.

The matters raised may:

- be investigated internally by the Chief Executive & Town Clerk, unless allegations relate to the Chief Executive & Town Clerk
- be referred to the Police.
- be referred to the Internal Auditor.

4.2 Some concerns may be resolved by discussion, explanation or agreed action without the need for a full investigation.

4.3 In the event that the concern relates to the Chief Executive & Town Clerk, then the allegation will be initially dealt with by the Deputy Town Clerk, with immediate oversight by the mayor.

4.4 In the event the concern relates to a councillor, the Chief Executive & Town Clerk will notify the mayor (or chair of resources if it relates to the mayor) to discuss and then treat as per the Code of Conduct.

4.5 The Council will take steps to minimise, as far as is practicable, any difficulties the employee may have in dealing with the officer considering the issue or with those implicated in the matter.

5. Resolution

5.1 The outcome of the investigation will result in a recommended action and where appropriate this will be feedback to the employee(s) that raised the matter. This may be in detail or generic depending on the confidentiality of the recommendations.

5.2 The fact an investigation has taken place, and the outcome will be reported to the Resources Committee to note.

5.3 In the event the employee believes that the allegation is not being dealt with, and after discussing with the Chief Executive & Town Clerk /Deputy Town Clerk and not getting a satisfactory response as to when an outcome can be expected, the employee(s) should report the delay to the mayor who will, discuss with the Chief Executive & Town Clerk /Deputy Town Clerk to establish:

- indicate how it proposes to handle the matter.
- give an estimate of how long it will take to provide a final response.
- advise whether further investigations will take place and if not, why not.

5.4 If on conclusion of this process you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body.

This includes:

- HM Revenue & Customs
- Equality and Human Rights Commission
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014: Whistleblowing: list of prescribed people and bodies - GOV.UK (www.gov.uk)