

# Whistleblowing Policy

## Policy Introduction

We aim for high standards both in how we act and how we provide our services. This includes being governed by various rules, regulations and laws. Like all organisations, there is a risk that sometimes we do not live up to those standards and something illegal or unethical may be happening.

If you become aware of failures to live up to our standards, we need to know. Speaking up when you have a concern is important and essential for us to be a well-governed organisation. Your concerns will be taken seriously and treated in confidence.

You may feel worried about raising a concern. We understand, but please don't be put off. We will look into what you have to say and offer you the support you need. We will not tolerate any victimisation of someone raising a concern, nor any attempt to bully you into not raising a concern.



Larissa Read – Chief Executive.

## Policy Aims

This policy aims to:

- Encourage staff, Members, contractors and partners to speak up on suspicions of wrongdoing as soon as possible, so that their concerns will be taken seriously and investigated while respecting confidentiality.
- Tell you how to speak up and raise concerns.
- Reassure you that you can raise genuine concerns without fear of reprisals even if you are mistaken.

## Who can raise concerns?

Anyone who works at, and for, all levels of the Council. This includes people working with the Council in partnership (including external contractors), temporary and fixed-term employees, Members, and volunteers. We collectively refer to this group as **staff** in this policy.

## What concerns can I raise?

You can raise a concern about any risk, malpractice or wrongdoing that you think is harming or could harm the service we deliver. The [Public Interest Disclosure Act 1998](#) (Act) sets out some examples (known as protected disclosures):

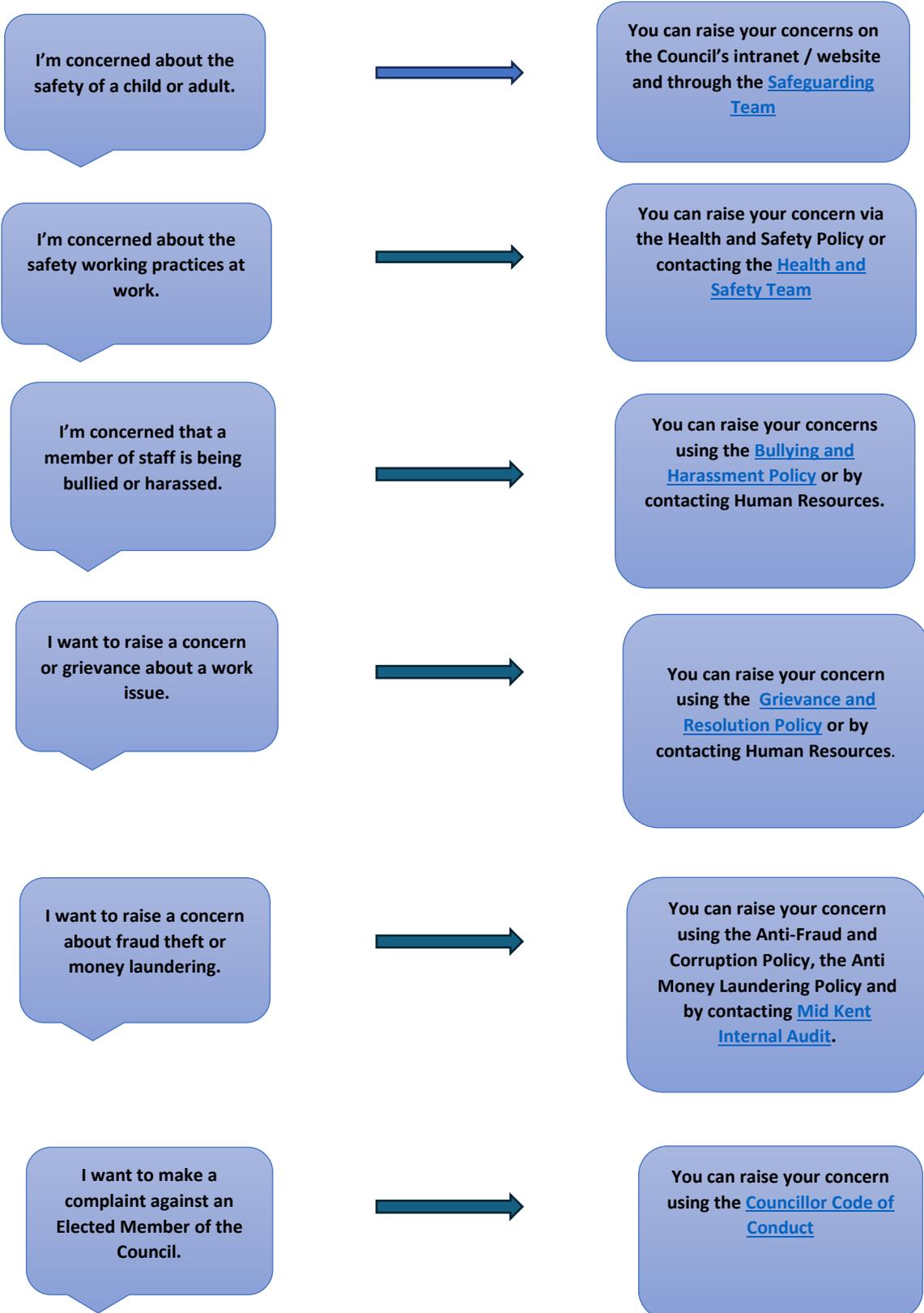
- Criminal activity (for example, theft or fraud);
- Miscarriages of justice (for example, wrongly cancelling a parking ticket);
- Dangers to health and safety (for example, faulty protective equipment);
- Damage to the environment (for example, wrongful waste disposal)
- Breaching legal requirements; and
- Covering up or concealing any of the above.

Anyone who raises a genuine concern related to any of the protected disclosures is referred to as a '**whistleblower**' by the Act. If you have concerns of this type, you should use this policy to raise your concerns about them.

Don't wait for proof. We want you to raise the matter while it is still a concern. If in doubt, speak up. It doesn't matter if you turn out to be mistaken, as long as you are genuinely troubled.

## Routes to raise other concerns

This policy aims to primarily address concerns detailed in the Public Interest Disclosure Act. The Council has a range of help and other policies to support other types of concern. The chart below will help you determine the best route to raise your concerns. Please refer to the contact details at page 7.



## Who should I raise concerns with?

In most cases, we hope you will be able to raise concerns in the first instance with your line manager, formally or informally. If for any reason you don't think it is appropriate to raise with your manager, or your manager has not addressed your concerns, you can use any of the options set out below:

- The [Head of Mid Kent Audit](#) or any member of the Internal Audit Team.
- The [Chief Executive](#)
- The [Director of Resources](#)
- The [Director of Regeneration and Neighbourhoods](#)
- The [Head of Mid Kent Human Resources](#)
- The [Head of Mid Kent Legal Services](#)
- Use the Council's reporting line [Whistleblowing@Midkent.gov.uk](mailto:Whistleblowing@Midkent.gov.uk) or the dedicated telephone number 01622 602059.

This policy aims to provide an internal route for staff to raise concerns relating to whistleblowing. However, we recognise it may sometimes be appropriate to raise the matter externally and we provide a range of contact details on page 7.

We strongly encourage you to seek advice before reporting externally, especially before contacting the media, and avoid divulging confidential and/or personal and/or sensitive information.

If you feel you cannot seek help internally in the first instance, the charity Protect can provide free independent advice which you may find helpful.

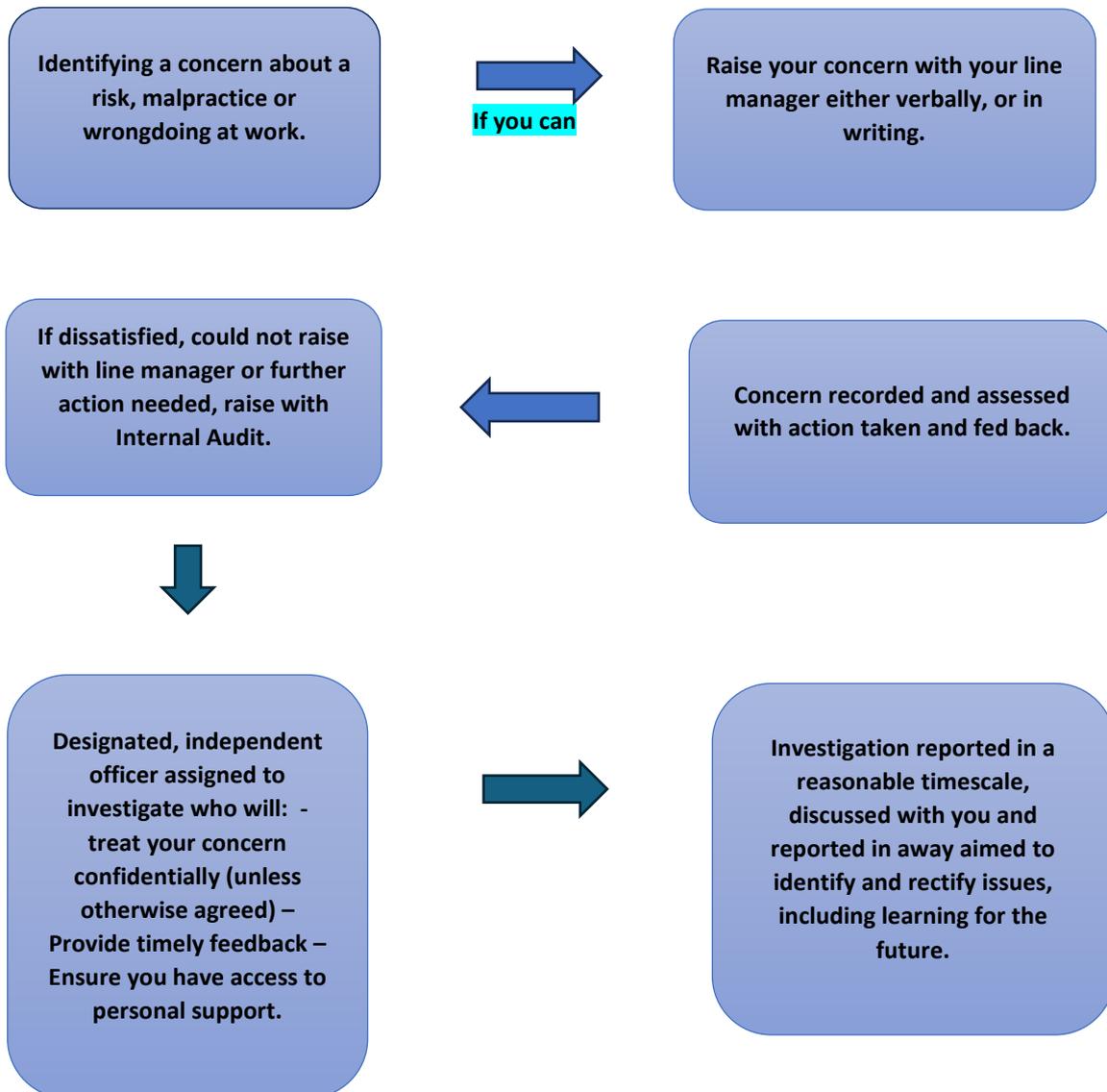
## What will we do

We are committed to listening to our staff, learning lessons, and improving our services. When we receive a concern through this policy on whistleblowing, it will be recorded and you will receive an acknowledgement within two working days. We will also note the date we received the concern, whether you have requested confidentiality, a summary of the matters raised, and dates where we have provided updates or feedback.

We hope that line managers will be able to resolve matters quickly and informally. Where that is not possible, we will carry out a proportionate and independent investigation. This will aim to reach a conclusion within a reasonable timescale, which we will notify you of. The investigation will be objective and produce a report focussing on identifying and remedying any issues, including lessons to prevent problems from happening again.

We will treat you with respect and thank you for raising concerns. We will keep you informed on progress, while respecting others confidentiality, and may ask you for further assistance. You should not, however, attempt to undertake your own investigation.

An example process for staff raising and escalating a concern is shown below.



We understand that people raising concerns are sometimes worried about possible repercussions. We will not tolerate victimisation of people who raise concerns. Such actions are contrary to our values as a Council and may result in disciplinary action. If you are put under pressure to keep your concerns to yourself or suffer any detriment for raising a concern you should report it to a director or senior officer, including the Chief Executive.

If we conclude that a member of staff has made false allegations raised in bad faith, for example maliciously or with a view to personal gain, then they may be subject to disciplinary action. Also, speaking up does not guarantee immunity for any person who raises concerns about malpractice they have been involved in.

The Head of the Internal Audit Partnership maintains a record of concerns raised under this policy and the outcomes (in a form which does not endanger your confidentiality) and will report as necessary to the Audit Committee.

## What if I'm not satisfied?

We cannot guarantee you will receive the outcome you seek, but we will deal with your concern fairly. You can help us do that by using this policy. However, if you are unhappy with how your concern has been handled, please raise the matter with the [Head of Mid Kent Audit](#) or the [Chief Executive](#).

## Useful contact details

### Within the Council

**Larissa Reed – Chief Executive.** Overall responsibility for the Council’s workforce.  
E: [LarissaReed@Swale.gov.uk](mailto:LarissaReed@Swale.gov.uk) T: 01795 417390

**Lisa Fillery – Director of Resources.** Responsibility for financial management of the Council.  
E: [LisaFillery@Swale.gov.uk](mailto:LisaFillery@Swale.gov.uk) T: 01795 417270

**Emma Wiggins – Director of Regeneration and Neighbourhoods**  
E: [EmmaWiggins@swale.gov.uk](mailto:EmmaWiggins@swale.gov.uk) T: 01795 417396

**Baljinder Sandher – Head of Mid Kent Human Resources**  
E: [Baljinder.Sandher@MidKent.gov.uk](mailto:Baljinder.Sandher@MidKent.gov.uk) T: 01622 602165

**Katherine Woodward – Head of Mid Kent Audit.** Responsibility for overseeing internal audit and counter fraud and the Council’s lead whistleblowing officer.  
E: [Katherine.Woodward@Midkent.gov.uk](mailto:Katherine.Woodward@Midkent.gov.uk) T: 01622 602057

**Claudette Valmond – Head of Legal Partnership.** Responsible for advising on the probity and legality of the Council’s decision making.  
E: [Claudette.Valmond@Midkent.gov.uk](mailto:Claudette.Valmond@Midkent.gov.uk) T: 01622 602124

**Robin Harris – Deputy Head of Legal Partnership (Monitoring Officer).**  
E: [Robin.Harris@MidKent.gov.uk](mailto:Robin.Harris@MidKent.gov.uk) T: 01622 602247

### **Reporting Line**

E: [Whistleblowing@Midkent.gov.uk](mailto:Whistleblowing@Midkent.gov.uk) T: 01622 602059

### External Contacts

**Protect.** The UKs Whistleblowing charity. ([Website](#))  
E: <https://protect.tfaforms.net/f/Contact-the-Advice-Line> T: 020 3117 2520

**Swale Citizen Advice.** ([Website](#))  
E: <https://citizensadviceswale.uk/> T: 0808 278 7979

**Grant Thornton.** The Council’s external auditors.  
T: 020 7383 5100

The Secretary of State has produced a prescribed list setting out both the permitted regulatory bodies and their remits which can be found [here](#).

## Version History and Review

Date	Lead Author	Notes	
1.0	July 2019	Rich Clarke	Ratified by Strategic Management Team
1.1	01.09.21		Review and updated personal details
1.3	24.04.25	Mark Goodwin	Wider review, circulation to Executive Management Team and other stakeholders.
	July 2025	Mark Goodwin	Ratified by Audit Committee

This policy will be reviewed bi-annually to ensure it remains effective and is up date with legislation.

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