London Borough of Hackney

Whistleblowing policy

Dated
1 May 2026

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1. Policy statement

1.1 London Borough of Hackney is committed to operating with honesty and integrity, and all staff and members of associated bodies, contractors and partners working with the Council are expected to maintain high standards in accordance with the Council's Code of Conduct and all applicable rules, regulations and legislation. However, all public authorities face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

1.2 The aims of this policy are:

(a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;

(b) To provide staff with guidance on how to raise those concerns;

(c) To reassure staff that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Protect (previously Public Concern at Work).

1.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. Who is covered by this policy?

This policy applies to all individuals working at and for all levels of the organisation, including senior managers, officers, directors, employees, apprentices, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff and volunteers (collectively referred to as **staff** in this policy). This policy also covers all staff working at the London Borough of Hackney's community maintained schools (but it does not extend to voluntary aided schools, academies or free schools, who should have their own arrangements in place).

3. What is whistleblowing?

3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

(a) criminal activity;

(b) miscarriages of justice;

(c) danger to health and safety;

(d) damage to the environment;

(e) failure to comply with any legal or professional obligation or regulatory requirements;

(f) bribery;

(g) financial fraud or mismanagement;

(h) negligence;

(i) sexual harassment;

(j) breach of our internal policies and procedures which affect other people (including the Council's Codes of Conduct for Employees and Members and related bullying harassment and microaggressions guidance, Standing Orders, Regulatory Framework, Financial Regulations);

(k) unauthorised disclosure of confidential information;

(l) the deliberate concealment of any of the above matters; or

(m) with regard to schools, the systematic failure to prioritise safeguarding where the appropriate procedures have not been followed.

3.2 A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

3.3 The decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing a service to the public and to the Council.

3.4 The Council will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith. Any investigation into allegations of potential malpractice or wrongdoing will not influence or be influenced by any disciplinary, capability, redeployment or redundancy procedures that apply to you.

3.5 We will maintain a 'Whistleblowers' Hotline for staff provided by Navex Global. To report a concern via the Whistleblowing Hotline please use the contact details provided at Section 11 of this policy. Details of this number are also available from the Whistleblowing page on the Council's Intranet.

3.6 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In these cases you should use the appropriate HR policy, such as the Grievance Procedure or the Bullying, Harassment and Microaggressions Policy.

3.7 Reporting safeguarding concerns, in relation to schools, should be dealt with under the London Child Protection Procedures and the 'Working Together 2015' guidance. This policy may, however, be used for reporting alleged

systematic failures to prioritise safeguarding where the appropriate procedures have not been followed.

3.8 If you are uncertain whether something is within the scope of this policy you should seek advice from the Council's Audit and Anti Fraud Service (contact details are provided at Section 11).

4. Raising a whistleblowing concern

4.1 Concerns that are expressed anonymously will be considered, however, in our experience there is a greater likelihood of a successful investigation if we are able to communicate directly with those who raise a concern.

4.2 It is hoped that in most cases you will be able to raise any concerns in the first instance with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Audit Investigations Team Manager who is the Council's designated Whistleblowing Officer (see Section 11).

4.3 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you feel unable to raise it with them for any reason, you should contact one of the following: -

(a) The Audit Investigations Team Manager

(b) Navex Global (our confidential external telephone hotline)

Contact details are set out at the end of this policy (see Section 11). If you decide to send your concerns by post please address them as follows to ensure confidentiality:

Private and Confidential, Whistleblowing Officer, Audit & Anti-Fraud, Hackney Town Hall, Mare Street, London E8 1EA.

4.4 Please note that under the Council's Code of Conduct, elected members should not be approached directly. Furthermore, concerns should not be reported to the press under any circumstances.

4.5 We may arrange a meeting with you to gain a thorough understanding of your concern. We will also aim to give you an indication of how we propose to deal with the matter.

4.6 School staff may choose to raise their concerns directly with the school – e.g., a member of the school's leadership team, the chair of governors or another appropriate/named governor. Where a school receives a direct whistleblowing referral (e.g., via the Headteacher or Chair of Governors), the school must inform Hackney Education's "Responsible Officer for Schools" (contact details at Section 11). This allows LBH to provide the school with any support as required as well as to maintain corporate oversight of the concern raised.

5. Confidentiality and anonymous complaints

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. If you want to raise your concern confidentially, we will make every effort to keep your identity secret. You can contact the Audit and Anti-Fraud Division and appropriate measures can then be taken to preserve your confidentiality. However, there are limited circumstances when your identity may have to be revealed, for example, if the investigation results in legal proceedings.

5.2 Experience has shown that concerns are more likely to be resolved where a whistleblower is prepared to provide their identity to the investigating party, and for this reason we do not encourage staff to make disclosures anonymously. It is more difficult to establish whether allegations are credible and it may be more difficult to deter any malpractice. Proper investigation may be more difficult or impossible if we cannot obtain further information from you, and we will be less able to provide assurance and feedback.

5.3 However, we do understand that whistleblowers may be concerned about possible repercussions if their identity is revealed and we would prefer that you report your concern anonymously rather than say nothing. If you are in any doubt you can seek advice from our confidential third-party hotline, Navex Global. Contact details are included in Section 11.

5.4 In relation to determining whether an anonymous allegation will be taken forward, the following factors will be taken into account:

(a) The seriousness of the issue raised;

(b) The credibility of the concern;

(c) The likelihood of confirming the allegation from attributable sources, and obtaining necessary information.

6. External disclosures

6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally before first exhausting this internal procedure.

6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to a designated external body, depending on the area that your concern relates to, such as the Council's External Auditor, the Care Quality Commission or Ofsted. A full list can be found at https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2. It will never be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external, and if you do so you must be careful not to reveal any confidential information unlawfully.

6.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first.

7. Investigation and outcome

7.1 If a concern involves suspicion that a criminal act may have taken place then the investigating service will be Audit & Anti-Fraud. If the concern appears to relate solely to actions that may be in breach of a staff code of conduct then the investigation is more likely to be guided by Human Resources.

7.2 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to provide further information as part of this process.

7.3 In some cases we may appoint an investigator or team of investigators including staff with specialist knowledge of the subject matter. In the case of school based staff, it may be appropriate for the investigation to be conducted by school governors. The investigation may make recommendations for change to enable us to minimise the risk of future wrongdoing.

7.4 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

7.5 If we conclude that a whistleblower has made false allegations and that these have been raised in bad faith (e.g. frivolously, maliciously, with a view to personal gain or for an ulterior motive) the whistleblower may be subject to disciplinary action. Furthermore, becoming a whistleblower does not guarantee immunity for any person who raises concerns about malpractice that they have been substantively involved in.

7.6 The Council has in place a number of rules, code of conducts and policies to ensure that procedures are properly controlled. These may be relevant to how we respond to some concerns that are raised through the whistleblowing reporting lines, including: -

- Code of Conduct for Council Employees
- Gifts & Hospitality Procedure
- Anti-Fraud & Corruption Policy
- Anti-Money Laundering Policy
- Anti-Bribery Policy
- Grievance Procedure
- Bullying, Harassment and Microaggressions Policy
- Modern Slavery Statement

8. If you are not satisfied

8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

8.2 If you are not happy with the way in which your concern has been handled, you can raise it with the Corporate Head of Audit, Anti-Fraud & Risk Management.

9. Protection and support for whistleblowers

9.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2 Staff must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

9.3 Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

10. Responsibility for the success of this policy

10.1 The Council's Corporate Head of Audit, Anti-Fraud & Risk Management has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

10.2 The Audit Investigation Team Manager is the Council's designated Whistleblowing Officer and has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

10.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Corporate Head of Audit, Anti-Fraud & Risk Management.

11. Contacts

Organisation / Officer Designation	Contact Details
Whistleblowing Officer (Audit Investigation Team Manager)	**Vinny Walsh** **Tel. 0208 356 2536** **Email Vinny.walsh@hackney.gov.uk**
Corporate Head of Audit, Anti-Fraud & Risk Management	**Michael Sheffield** **Tel. 0208 356 2505** **Email Michael.sheffield@hackney.gov.uk**
Hackney Human Resources - Responsible Officer for Non-criminal Concerns	**Natalia Castaneda** **Email natalia.castaneda@hackney.gov.uk**
Hackney Education – Responsible Officer for Schools	**Kathryn Lloyd** **Tel. 0208 356 8703** **Email Kathryn.lloyd@hackney.gov.uk**
Whistleblowing Hotline (24 hour hotline)	**Navex Global** **Tel. 0800 890011,** **then at the prompt, dial 833 558 1923**
Protect (Independent whistleblowing charity)	**Helpline: 020 3117 2520** **Website: https://protect-advice.org.uk/**

12. Document & Version Control

12.1 Document and version control

Document and version control	
Title of document	Whistleblowing Policy
Owner	Michael Sheffield
Job title of owner	Corporate Head of Audit, Anti-Fraud & Risk Management
Directorate	Finance and Corporate Resources
Approved by	Audit Committee
Publication date	May 2026
For use by	All staff
Why issued	Corporate Policy
Review date	May 2028 (normal review will be biennial as minimum, with ad hoc review as necessary)

Version control details				
Version No.	**Author / editor**	**Version date**	**Approval date**	**Overview of changes**
V1.0	Michael Sheffield	April 2018	April 2018	Initial 2018 version
V2.0	Michael Sheffield	1 April 2022	April 2022	2021 version incorporating revised contact details, HR comments and minor amendments
V2.1	Michael Sheffield	April 2024	April 2024	Policy was reviewed with no substantive changes being required
V2.2	Michael Sheffield	April 2025		Schools contact details updated, no other changes
V2.3	Michael Sheffield	May 2026	April 2026	Advice on whether AAF or HR will investigate, inclusion of sexual harassment as a distinct category that may afford whistleblowing protection and updated contact details

12.2 Publication
This policy will be published on the Council's intranet, and made available to members of the public on request.

12.3 Review
This policy will be reviewed biennially, and at shorter intervals in line with any significant developments that may affect its relevance - for example, new legislation or technology