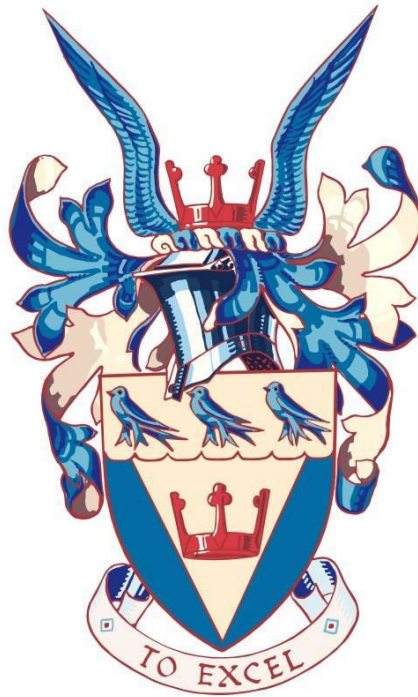




BOGNOR REGIS TOWN COUNCIL

WHISTLEBLOWING POLICY

Adopted by the Council at its Meeting held on 6th July 2026

Introduction

The Council is committed to the highest standards of openness, integrity and accountability.

This policy sets out how concerns about wrongdoing within the Council can be raised safely and appropriately.

It aims to:

- Encourage individuals to raise concerns at an early stage
- Provide a clear process for reporting concerns
- Protect individuals from victimisation or detriment
- Ensure concerns are investigated properly and proportionately

This policy reflects the protections available under the Public Interest Disclosure Act 1998, as amended, and associated employment legislation.

What is Whistleblowing?

Whistleblowing is the reporting of concerns about wrongdoing where it is in the public interest to do so. Such concerns may relate to a wide range of issues, including criminal offences, failures to comply with legal obligations, miscarriages of justice, risks to health and safety, environmental damage, fraud, corruption or financial mismanagement, abuse of authority, serious maladministration, or the deliberate concealment of any such matters. This policy is not intended to cover personal employment grievances, which should be raised under the Council's Grievance Procedure, nor complaints about Council services, which should be addressed through the Complaints Procedure.

Raising a Concern

Concerns should normally be raised with the Deputy Clerk or, where appropriate, the Town Clerk. Where the concern relates to the Town Clerk, it should be raised with the Chair of the Policy and Resources Committee or the relevant staffing body. Concerns may be raised in writing, by email, or in person, and should be made as soon as reasonably possible after the issue arises. Individuals are encouraged to provide sufficient detail to enable the matter to be understood and investigated, including the nature of the concern, relevant dates, and any supporting information available at the time.

Confidentiality and Anonymity

The Council will treat all concerns in confidence as far as reasonably practicable. The identity of the individual raising the concern will not be disclosed without their consent unless this is required by law or necessary for the purposes of a fair investigation. Anonymous disclosures may be considered; however, it should be noted that anonymity can make it more difficult to investigate concerns effectively or to provide feedback.

Protection for Whistleblowers

The Council is committed to ensuring that individuals who raise concerns in good faith are protected from dismissal, disciplinary action, victimisation or any form of detriment. No action will be taken against an individual who raises a concern where they reasonably believe it to be in the public interest, even if the concern is not ultimately substantiated. However, the Council reserves the right to take appropriate action where a concern is found to have been raised maliciously or with knowledge that it is false.

How Concerns Will Be Handled

Upon receipt of a concern, the Council will acknowledge it where contact details have been provided and carry out an initial assessment to determine the appropriate course of action. This may include an internal investigation, referral to an external body, or a decision that no further action is required, with reasons recorded. Any investigation will be conducted in a timely, fair and proportionate manner, having regard to the nature and seriousness of the concern. The individual raising the concern will be informed, where appropriate and lawful, of the outcome of the process, although detailed information may not always be shared due to confidentiality considerations.

Escalation and External Reporting

Where an individual feels unable to raise a concern internally, or is dissatisfied with how it has been handled, they may choose to raise the matter with an appropriate external body. This may include the Information Commissioner's Office or another prescribed regulator, depending on the nature of the concern. Independent advice and guidance can also be sought from Protect.

Record Keeping

The Council will maintain appropriate records of whistleblowing concerns, including details of the concern raised, actions taken, and the outcome. Such records will be handled securely and retained in accordance with the Council's Data Protection Policy and Data Retention Policy.

Relationship with Other Policies

This policy should be read in conjunction with the Council's wider governance framework, including the Grievance Procedure, Disciplinary Procedure, Complaints Procedure, Data Protection Policy, and Code of Conduct, which together support the Council's commitment to transparency, accountability and good governance.

Monitoring & Review

Compliance will be monitored by the Deputy Clerk and Town Clerk.

This policy will be reviewed regularly, or sooner if legislative changes require.