AUDIT AND GOVERNANCE COMMITTEE 26 November 2025

ANNUAL REPORT ON WHISTLEBLOWING

Report by the Director of Law & Governance and Monitoring Officer

RECOMMENDATION

The Committee is RECOMMENDED to:

- a) note the number of incidents of Whistleblowing during the 2024-25 financial year and
- b) note that training on Whistleblowing is currently being rolled out within the organisation.

Background

- 1. The council's Whistleblowing Policy (as presented to and approved by this Committee on 13 March 2024) provides clarity around the six categories set out in the Employment Rights Act 1996 that make a complaint a qualifying disclosure under the Public Interest Disclosure Act 1998.
- 2. A copy of the policy is attached to the report. A review of this policy will be undertaken in early 2026.
- 3. In 2024-25, to support the implementation of the revised policy, members of the council's Strategic Leadership Team, along with colleagues from HR, Audit & Counter Fraud, Finance, and Law & Governance, completed The Chartered Institute of Public Finance and Accountancy's (CIPFA) Whistleblowing eLearning course.
- 4. The council's Governance Team has produced in-house Whistleblowing training, which was published on the Learning Zone in October 2025 and is accessible to all employees. Completion of this eLearning course is mandatory for managers, and new employees as part of the induction process, while all employees are encouraged to undertake the training annually. Details of the course have been shared through internal channels including Hive, Viva Engage, and the November Managers' Briefing.

Incidents of whistleblowing during 2024-25

- 5. Six whistleblowing allegations were received. Three were assessed by the Monitoring Officer as requiring action under a different council policy (for example the Grievance Procedure in accordance with the Resolving Concerns (grievances) Policy), and three were accepted as requiring investigation under the Whistleblowing Policy.
- 6. A summary of allegations and the status of investigation are provided below:
 - a) Health and Safety considerations in a Children's Services programme of events - investigation completed. The investigation led to recommendations for enhanced group segregation, provision of interpretation services, a review of risk perceptions and thresholds, improvements to attendance register procedures, and confirmation of authority delegation for future trips.
 - b) Practices when safeguarding checks being undertaken with partner agencies investigation completed. Following this investigation, identified risks were communicated to partner agencies, and a review of information sharing procedures was conducted.
 - c) Treatment of employee with protected characteristics under Disability and Equality legislation. An investigation was commissioned to ensure the Council was not in breach of its obligations under the Equality Act 2010. The investigation was completed, and the matter was satisfactorily resolved.
- 7. All three of the allegations were reported by council employees.
- 8. For the first six months of 2025-26, 1 April to 30 September 2025, seven whistleblowing allegations were received. Of these, one was assessed by the Monitoring Officer as requiring action under a different council policy. Six have been accepted as requiring investigation under the council's Whistleblowing Policy.
- 9. A single point of confidential contact is available at whistleblowing@oxfordshire.gov.uk and overseen by the Monitoring Officer and Chief Internal Auditor. The policy gives the contact details of senior managers and external organisations in case a person wishes to raise matters that way in the first instance.

Corporate policies and priorities

10. The Whistleblowing Policy supports the council's organisational values, most notably 'equality and integrity in all that we do' and 'taking responsibility'.

Financial implications

11. There are no direct financial implications directly relating to, or arising from, the recommendation in this report.

Checked by: Drew Hodgson, Strategic Finance Business Partner

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Risk management implications

12. Without clear arrangements for employees to raise whistleblowing concerns safely, it is difficult for an organisation effectively to manage the risks it faces.

Legal implications

13. The Public Interest Disclosure Act 1998 sets out a framework for a worker to make disclosure (whistleblowing) about categories of wrongdoing, if there is a public interest in doing so. A person raising such a concern has a right not to suffer any detriment. The Council's Whistleblowing Policy is consistent with the expected framework, and other best practice guidance, and sets out the expected protections.

Checked by: Jay Akbar, Head of Legal & Governance Services, &

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Equality and inclusion implications

14. The Whistleblowing Policy is intended to give confidence to all who wish to raise an allegation of wrongdoing and not to disadvantage any individual that has one or more protected characteristic.

Anita Bradley

Director of Law & Governance and Monitoring Officer

Annex: Whistleblowing Policy

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November 2025