

Counter Fraud Progress Report 2026/27

Date: 22 July 2026

ANNEX 1

CONTENTS

3	Background
3	Counter Fraud Management
4	Multi-Agency Work
4	Investigative Work
6	Appendix A – Summary of Investigative work
9	Appendix B – Whistleblowing Policy and Procedure (updated)



BACKGROUND

- 1 Fraud is a significant risk to the public sector. Fraud is the most common offence in the UK, accounting for 41% of all crime¹. The National Audit Office estimates that fraud and error cost the taxpayer between £55 and £81 billion in 2023/24 and only a fraction of this was detected². Financial loss due to fraud can reduce a council's ability to support public services and cause reputational damage.
- 2 Veritau provides a corporate fraud service to City of York Council which aims to prevent, detect and deter fraud and related criminality. We use qualified criminal investigators to support departments with fraud prevention, proactively identify issues through data matching exercises, and investigate suspected fraud. To deter fraud, offenders face a range of outcomes, including prosecution in the most serious cases.
- 3 The counter fraud team also plans and takes part in counter fraud campaigns (eg the National Fraud Initiative), undertakes fraud awareness activities with staff and the public, and maintains and updates the council's counter fraud framework and associated policies.
- 4 The purpose of this report is to update the Committee on counter fraud activity in 2026/27.



COUNTER FRAUD MANAGEMENT

- 5 The financial target for the counter fraud team has been subject to discussion with senior council managers. The target has been set at £200k for some time. In May the amount of resource for counter fraud work was set at 887 days, which represents a 10% reduction compared to previous years. A decision has been taken to maintain the financial target at the current level and re-evaluate it at the end of the financial year.
- 6 The council's whistleblowing policy has been updated in line with new legislation (appendix B). The policy, in line with the Employment Rights Act 2025 which came into force in April, now explicitly makes it clear that workers reporting sexual harassment will receive protection against detrimental treatment and dismissal as detailed by the Public Interest Disclosure Act 1998. The new policy was publicised to council employees at the end of June to mark World Whistleblowers' Day.
- 7 In May, City of York Council participated in National Blue Badge Awareness Week.³ Councils from across the country undertook verifications of blue badges found to be in use, supported by the British Parking Association and Disability Motoring UK. Officers from the Parking Department and Veritau worked together to inspect 80 badges across several locations in York. The

¹ [Progress combatting fraud \(Forty-Third Report of Session 2022-23\)](#), Public Accounts Committee, House of Commons

² [An overview of the impact of fraud and error on public funds](#), National Audit Office

³ [Council combats Blue Badge misuse](#), City of York Council

vast majority of the badges were being used correctly, however two cases of potential misuse were identified and are currently under investigation.

- 8 The counter fraud team delivers service area specific fraud training to council teams throughout the financial year. In April, fraud awareness training was provided to the council's Procurement Team. The session covered the danger of cartels in procurement exercises, how to identify them, and how the counter fraud team can help to investigate concerns.
- 9 Veritau shares alerts on fraud threats identified by partners in the counter fraud community, including the National Anti-Fraud Network (NAFN). When Veritau identifies threats that could affect other local authorities, then a threat report is made so all NAFN members are aware. Recent alerts from NAFN have included details of fraudulent applications to crisis and resilience funds and concerns about a website advertising council job vacancies which is believed to be harvesting data and not actually sending applications to the prospective employers.



MULTI-AGENCY WORK

- 10 The National Fraud Initiative (NFI) is a large-scale data matching exercise that involves all councils and other public sector bodies in the UK. The work of the NFI is overseen by the Public Sector Fraud Authority (PSFA) and the exercise runs every two years. The 2026/27 exercise will begin in October when a range of datasets will be uploaded to the PSFA for data matching. The results are expected in late 2026 and early 2027.
- 11 In line with the Local Audit and Accountability Act 2015, the PSFA has recently consulted with local government about changes to the National Fraud Initiative. They recently sought views about a proposed 50% increase in fees (from £4040 to £6045 for unitary authorities) which is in part justified by a new proactive tool which will allow councils to directly access HMRC data.



INVESTIGATIVE WORK

- 12 Between 1 April and 30 June 2026, the counter fraud team logged 119 referrals of suspected fraud. Thirty investigations have been completed and there are currently 98 cases ongoing. Three people have accepted formal cautions in lieu of prosecution. One Right to Buy application has been rejected. One person's banding has been downgraded following false information being provided in an application for housing. Eight people have received formal warnings about their conduct. Three residential parking permits have been removed from owners of holiday lets.
- 13 The team recently supported the council in a planning application appeal heard by the Planning Inspectorate. An investigation found that false documents purporting to be from local and national estate agents had been submitted as part of a planning application which sought to convert a business premise to residential use. Three people were interviewed under

caution about potential offences. While it was not possible to establish the perpetrators of this fraud to the required criminal standard, the appeal against the council's planning decision was dismissed and the false documents were acknowledged in the decision. The matter has been reported to the police.

- 14 A recent proactive exercise was undertaken to identify the misuse of residential parking permits by holiday let owners. The council keeps a log of the number of changes to vehicle registrations linked to electronic residential parking permits. The team reviewed 51 properties with more than five vehicle changes in 2025/26, and ten cases were set up for further investigation. The team will run this exercise at least annually in future.
- 15 Counter fraud savings⁴ are tracked by monitoring repayments to the council following fraud investigations and calculating the value of stopping ongoing fraud. To date, £88k of counter fraud savings have been identified.
- 16 A summary of investigative work can be found in appendix A below.

⁴ Counter fraud savings consist of money recovered during the course of the year (debts may have been calculated in previous years as well as the current financial year), the value of applications that would have been successful, eg Right to Buy or Financial Assistance, and 12 months of savings where an ongoing fraud has been stopped through the work of the counter fraud team.

APPENDIX A: SUMMARY OF INVESTIGATIVE WORK 2026/27

The tables below summarise the results of investigative work to date.

	2026/27 (As at 30/06/26)	2026/27 (Target: Full Yr)	2025/26 (Actual: Full Yr)
Amount of counter fraud savings (quantifiable savings, eg repayment and prevention of loss) identified through fraud investigation	£87,889	£180,000	£219,512
% of investigations completed which result in a successful outcome (for example payments stopped or amended, sanctions, prosecutions, properties recovered, housing allocations blocked)	50%	30%	56%

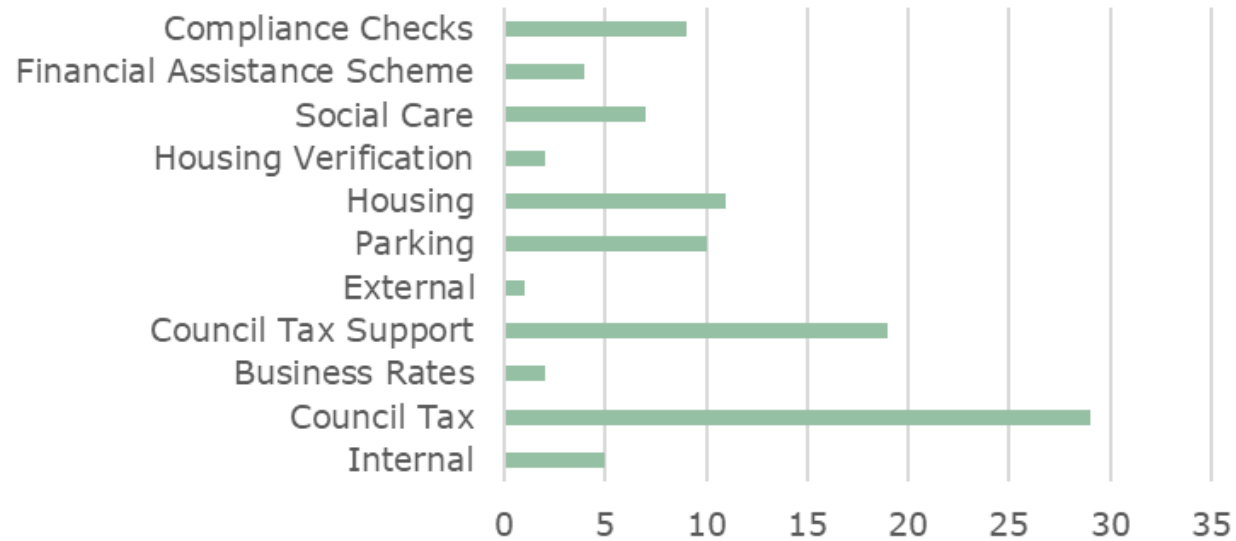
	2026/27 (As at 30/06/26)	2025/26 (Full Year)
Referrals received	119	301
Number of cases under investigation	98	79 ⁵
Number of investigations completed	30	84
Number of compliance checks completed	12	26
Number of verifications completed ⁶	2	13

⁵ As at the end of the financial year (ie 31/03/2026)

⁶ Verification cases are reviews of applications for Right to Buy and school placements.

The following chart shows the number of cases under investigation (98) by type, on 30 June 2026.

CASES UNDER INVESTIGATION



Activity	Work completed or in progress
Fraud detection and investigation	The service applies criminal investigation standards and methods to respond to fraud perpetrated against the council. Activity to date includes the following: • Housing fraud – Four housing fraud investigations have been completed. A warning has been issued to a tenant who was subletting their property whilst living abroad. One Right to Buy application has been blocked. A person who provided false information in connection with an application for housing received a warning and had their banding downgraded. There are eleven ongoing investigations. • Adult Social Care fraud – Two investigations in this area have been completed. Seven investigations are ongoing, they relate to financial abuse, direct payment fraud, undeclared capital and debt recovery. • Internal fraud – One investigation has been completed and five investigations ongoing in this area. • Council Tax and business rates fraud – Four investigations have been completed. One person has accepted a caution in lieu of prosecution and one person has received a formal warning. • Parking fraud – Parking fraud often relates to blue badge abuse, however the team also investigates the misuse of residential parking permits by landlords of holiday lets. Twelve investigations have been completed – seven relating to blue badges, five to parking permits. Two people accepted cautions in lieu of prosecution and four have been issued formal warnings about their conduct. Three residents parking permits have been removed from people as they were being used commercially, eg guest houses and holiday lets. Ten investigations are ongoing. • Council Tax Support fraud – Two Council Tax Support (CTS) cases have been completed and there are 19 under investigation. One person has been issued a formal warning. • Financial Assistance Scheme fraud – Three investigations have been completed, and four are under investigation.

Appendix B: Whistleblowing Policy and Procedure



City of York Council

WHISTLEBLOWING POLICY

Current Document Status			
Version	1.2	Approving Body	
Issue Date	1/06/2026	Date of Formal Approval	
Responsible Officer		Director – Corporate Fraud (Veritau)	
Document Location (e.g. network drive)			

Version History			
Date	Version	Reviser	Comments
08/11/2019	1.1	Jonathan Dodsworth	Full rewrite of previous iteration from 2016.
15/06/2026	1.2	Jonathan Dodsworth	Updated to reflect changes to legislation (Employment Rights Act 2025) and employment tribunal rulings.

Review History			
Review Period:		Annual review by Veritau. Updates as required by employment law and tribunal decisions.	
Date Reviewed	Reviewed By	Next Review Date	Comments

Document Retention	
Document Retention Period	Old versions to be retained for 6 years

1 INTRODUCTION

- 1.1 City of York Council is committed to maintaining high standards of integrity and accountability. It aims to create an open environment in which employees and those working on behalf of the council can raise issues and be confident that they will be acted upon. The council's message to anyone working for the organisation is straightforward - if in doubt, raise it!
- 1.2 The whistleblowing policy provides a framework for council workers to raise concerns about issues happening at the council. For example, health and safety risks, criminal or unlawful activity, or activities that could damage the environment. It sets out how concerns can be raised and the protection that people working for the council have if they raise an issue.
- 1.3 The policy covers concerns raised by employees, workers, and contractors. It reflects the specific protections they have in law when making a protected disclosure. This is also known as raising a whistleblowing concern or blowing the whistle. Further information on what a protected disclosure is, and who the law protects is set out below.
- 1.4 The Public Interest Disclosure Act 1998 (PIDA) is the law that protects people against detrimental treatment or dismissal if they make a protected disclosure. It is part of the Employment Rights Acts 1996 and 2025. This policy is designed to reflect the legislation⁷ as well as guidance from the government and other organisations⁸.
- 1.5 A guide for managers and other employees on what to do if they receive a whistleblowing report is contained in appendix A of this policy. Training packages for both staff and managers on whistleblowing can be found on the council's e-learning system which provides further information on the principles set out in this policy.

2 AIMS AND SCOPE OF THE POLICY

- 2.1 This policy aims to:
- encourage workers to raise concerns they have about their workplace or working practices
 - make sure managers know what a whistleblowing concern is and how they must address it

⁷ PIDA 1998 was updated by the Enterprise and Regulatory Reform Act 2013 and the Employment Rights Act 2025.

⁸ Whistleblowing guidance has been issued by the Department for Business and Trade, the National Audit Office and the charity, PROTECT.

-
- ensure that workers receive a response to any concerns raised
 - inform workers about how they can pursue an issue further if they are not satisfied with the action taken by the council
 - reassure workers that they will be protected from dismissal or negative treatment if they raise concerns.

2.2 This policy applies to most people working for the council. This includes employees, workers, staff in maintained schools, agency personnel, contractors and staff seconded to or from a third party. Throughout the rest of the policy, the terms worker, or workers is used to mean anyone covered by the policy and the protections of PIDA.

2.3 PIDA does not currently provide protection under the law for job applicants, genuinely self-employed workers, or volunteers.

Definitions

2.4 Protected disclosures are concerns raised that are protected under PIDA. To be a protected disclosure, anyone raising a concern must:

- reasonably believe that their concern is in the public interest – this is explained in paragraph 2.6;
- reasonably believe their concern is a type of wrongdoing covered by the law – a list of the types is included in paragraph 2.7; and
- raise it in a way that that is in accordance with the law – further information on this is provided in section 7.

2.5 A reasonable belief is one where the whistleblower has some reasonable grounds or basis for believing there has been wrongdoing. It does not actually have to be true. For example, it does not matter if it turns out they were mistaken, providing they had reasonable grounds for believing it when they originally raised the concern.

2.6 An issue in the public interest means that it will usually affect people other than just the person raising it. Something that relates only to an individual's own employment may not be covered by whistleblowing legislation, although there are some circumstances when this could still be in the public interest (for example, an issue about bullying or sexual harassment usually reflects a wider cultural issue in a team). This policy is intended to cover workers raising an issue in the public interest. If a person needs to address a problem that relates only to their own employment, then they should refer to the Grievance Procedure. However, any concern related to alleged sexual harassment

should be considered under the whistleblowing policy and with reference to the Dignity at Work Policy.

- 2.7 The list below sets out the types of concerns that qualify for protection under the law if they are raised.
- A criminal offence – for example corruption, theft, or fraud.
 - Failure to comply with a legal obligation such as a statutory requirement, a contract, or common law obligations (eg negligence).
 - A miscarriage of justice.
 - Health and safety risks. This includes risks to anyone, not just workers – for example risks to customers and service users.
 - Sexual harassment⁹ has occurred, is occurring, or is likely to occur.
 - Environmental damage. Any wrongdoing that endangers or damages the environment.
 - Cover-up. This includes anything where wrongdoing in any of the above areas has been deliberately concealed.

3 SAFEGUARDS

- 3.1 The council recognises that a decision to report a concern can be a difficult one. In many cases it is workers who are best placed to learn of wrongdoing within service areas and schools or to hear about issues where standards have fallen below those that the council and public expect. The council is grateful to everyone who reports their concerns.
- 3.2 Workers should have nothing to fear by reporting their concerns if they have grounds for believing what they are reporting is true. Even if it is later found to be incorrect, no action will be taken against anyone genuinely reporting a concern.
- 3.3 While rare, deliberately false reports are sometimes made. If false or deliberately misleading information is provided, then this would be considered a serious matter. It could result in action being taken under the council's disciplinary policy. Equally, deterring another worker from reporting a genuine concern is also a serious matter and may also result in disciplinary action being taken.
- 3.4 The council will not tolerate any negative treatment (including harassment or victimisation) of a worker who has raised a whistleblowing concern, by anyone (including colleagues and managers). Any allegations of negative treatment of

⁹ As defined by the Equality Act 2010, [section 26](#) and the council's Dignity at Work Policy.

someone raising a concern will be investigated. Where evidence of mistreatment is found then this could result in disciplinary action being taken.

- 3.5 The council recognises that workers may want to raise a concern in confidence under this policy. If a worker asks the council to protect their anonymity, then efforts will be made to protect their identity from being disclosed. However, this cannot be guaranteed, for example, if evidence needs to be presented in court, or revealed as part of a subsequent investigation. Equally, the council cannot guarantee that the worker's colleagues will not deduce, or simply guess, their identity. If it becomes clear that a whistleblower's anonymity cannot be protected, then this will be discussed with them before any disclosure is made.
- 3.6 The council encourages workers to put their names to information they disclose. Concerns expressed anonymously will be considered by the council. However, they can be harder to investigate. This may make it more difficult to gather evidence to confirm wrongdoing. It will also not be possible to provide feedback to an anonymous whistleblower during or following an investigation. Anonymous reports are, however, preferred to silence.

4 HOW TO RAISE A CONCERN

- 4.1 Many whistleblowing concerns are raised and properly addressed within individual service areas. In most cases, workers are therefore encouraged to raise concerns with their line manager in the first instance¹⁰. Line managers will provide feedback to the whistleblower about the action they are taking. Contractors should report issues to the council's designated contract or client manager.
- 4.2 Concerns do not have to be made in writing. Any issues raised verbally will be treated just as seriously.
- 4.3 If a worker raises an issue with their line manager but it is not adequately addressed or if the concern involves the line manager, then they should speak to a more senior officer. School-based workers can escalate issues to the chair of governors.
- 4.4 The council recognises that there may be times when whistleblowers feel unable to speak to anyone in their own service area. For example, if they

¹⁰ People raising a concern may not directly say they are whistleblowing or making a protected disclosure. It is therefore essential that managers understand when an issue raised with them would be considered whistleblowing. Further information is available in the guidance notes included with this policy. Training is also available through the MYLO. Managers can also contact Veritau for advice on any issues raised.

believe the issue involves more senior officers or if the issue has already been raised through the normal channels but has not been addressed. In this situation workers can contact the council's whistleblowing hotline on 0800 9179 247, which is overseen by Veritau. Veritau is not independent from the council, rather it provides another route to raise whistleblowing concerns.

- 4.5 If anonymous concerns are raised through social media, then they will be considered under the more general counter fraud or complaints policies unless it is beyond doubt that the person raising the concern would fall under the whistleblowing policy.

5 HOW THE COUNCIL WILL RESPOND

- 5.1 All whistleblowing reports will be carefully considered. Initial enquiries will be made to help decide whether an investigation is needed or what action may be required.
- 5.2 The council aims to acknowledge all whistleblowing reports within five working days. The line manager or other officer dealing with a whistleblowing issue will try to write or speak to the whistleblower promptly, to provide additional information on what is being done. For example, whether an investigation is needed or if specific action is to be taken.
- 5.3 If an investigation is undertaken, the line manager or investigating officer will provide feedback on the outcome, and details of action to be taken as far as possible. Although it may not always be possible to provide full details. For example, it would not be appropriate to share personal data about other people.

6 INVESTIGATION AND REPORTING PROCESS

- 6.1 The steps line managers need to take will depend on the nature, complexity, and seriousness of the issue raised. An outline of the process managers should follow is set out below. Further information for managers on who they need to inform about whistleblowing issues is set out in the guidance at appendix A.
- 6.2 Straightforward whistleblowing issues may be dealt with directly by line managers. The manager must ensure the requirements for acknowledging concerns and providing feedback are followed (see section 5 above). When the issue has been dealt with, the line manager must provide details to Veritau of the concern raised and the outcomes (Veritau keeps a record of all whistleblowing concerns raised, on behalf of the council).

-
- 6.3 For more complex cases, and any case involving suspected fraud, corruption, or theft, managers must refer the issue to Veritau at the outset. Veritau will liaise with the manager to decide how the issue should be investigated. The officers assigned to investigate each case will depend on the nature of the issue. For example, safety issues may be investigated by the Health & Safety Team, alleged fraud or criminality by the Counter Fraud Team, or employment issues by the manager or a manager from another team, with support from Human Resources.
- 6.4 For sexual harassment cases the principles and processes documented in the Dignity at Work Policy should be followed.
- 6.5 The amount of contact between officers investigating whistleblowing concerns and the whistleblower will depend on the nature of the matters raised and the clarity of the information provided. If necessary, further information may be sought from the whistleblower.
- 6.6 If a face-to-face meeting is necessary or desirable the whistleblower has the right, if they so wish, to be accompanied by a Union representative or a colleague who is not involved in the area of work to which the concern relates.
- 6.7 The council will take steps to support whistleblowers during an investigation, where possible. For example, if they are required to give evidence in any proceedings, the council will provide advice and support with the process as far as appropriate. Whistleblowers should contact HR if they suffer any negative treatment as a result of raising an issue. Investigating managers should be alert to the possibility of a whistleblower being mistreated and should liaise with the Head of HR or relevant HR manager if they have concerns.
- 6.8 All whistleblowing issues raised will be logged centrally by Veritau. The Chief Executive, Section 151 Officer, and the Monitoring Officer will be notified of relevant whistleblowing issues. Numbers of whistleblowing concerns raised, and significant trends, will also be reported annually to the Audit and Governance Committee.

7 HOW MATTERS CAN BE TAKEN FURTHER

- 7.1 This policy aims to provide workers with the means to raise concerns within the council. If workers have reported an issue in accordance with the policy, but are not satisfied that it has been addressed then they may contact the following prescribed bodies:

-
- the council's External Auditor – Forvis Mazars¹¹
 - the NSPCC or Ofsted (for concerns about children at risk of abuse)¹²
 - relevant professional bodies or regulatory organisations¹³, for example, the Information Commissioner's Office, Care and Quality Commission (CQC), and the Health and Safety Executive.

7.2 Disclosure of issues to a non-prescribed body (such as a newspaper or through social media) do not usually provide whistleblowers with protection under PIDA. Workers who are considering making a disclosure, other than to the prescribed bodies, should obtain specialist legal advice before doing so.

8 INDEPENDENT ADVICE

8.1 Free confidential advice on how to raise a concern about malpractice at work can be sought from the independent charity PROTECT. They can be found at www.protect-advice.org.uk, or contacted by email at info@protect-advice.org.uk. The charity's lawyers can give free confidential advice about how to raise a concern about serious malpractice at work.

9 DATA PROTECTION

9.1 When managing whistleblowing reports, the council processes personal data collected in accordance with its employee privacy notice. Data collected from the point at which a report is made is held securely and accessed by, and disclosed to, individuals only for the purposes of managing the whistleblowing concern.

9.2 Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the council's Breach Management policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the council's Disciplinary policy

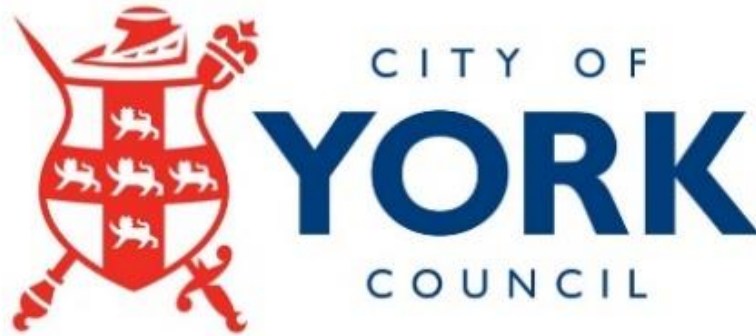
¹¹ Forvis Mazars act as the council's external auditor (see their [website](#) for further details).

¹² The NSPCC and Ofsted offer dedicated national whistleblowing hotlines (see www.nspcc.org.uk and www.gov.uk/government/organisations/ofsted for further details).

¹³ The Department for Business, Innovations and Skills maintains a list of prescribed persons and organisations who may be contacted, www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies.

10 REVIEW OF THE POLICY

- 10.1 This policy will be reviewed at least every three years or when any significant changes to whistleblowing legislation, guidance or employment law occurs.



Managers' Guidance on Whistleblowing

1 Introduction

- 1.1 The council's whistleblowing policy aims to encourage employees, workers, and contractors¹⁴ to raise concerns about activities in the workplace. It contains further information about what whistleblowing is and should be read alongside this guidance.
- 1.2 All managers are expected to take concerns raised by workers seriously and to follow the process set out in this guidance. Further training on whistleblowing is available through the council's e-learning platform - MYLO.

2 What is a whistleblowing complaint?

- 2.1 Managers need to consider any concern raised by a worker about working practices or malpractice, to assess whether it is a whistleblowing issue.
- 2.2 The concern does not have to be raised in writing. Issues raised verbally should be treated as seriously as those raised in writing. You should carefully document anything raised verbally with you.
- 2.3 It is not necessary for the term "whistleblowing" or "protected disclosure" to be used for an issue to be considered whistleblowing. Any concern that falls under the types of issues covered by the policy (see paragraph 2.7 of the main policy) may be a whistleblowing issue. The range of issues that could qualify is very broad and could include problems that may not initially appear very serious. For example, relatively minor breaches of health and safety processes or issues concerning a breach of contract. Care must therefore be taken to assess any issue raised with you, to consider whether it is whistleblowing.
- 2.4 Whistleblowing will generally be about issues that relate to more people than the individual who raised it. If it is clear that a concern relates only to an individual worker, other than in cases of potential sexual harassment which should always be considered under the whistleblowing policy (along with the Dignity at Work policy), then it should be considered under the Grievance Procedure. However, care is needed when deciding this. For example, a report of bullying could just be about one worker. However, it could also reflect a culture of bullying and harassment in a service area. In this case the concern may be whistleblowing.
- 2.5 Whistleblowing reports can only come from people who work for the council (including contractors). Further detail about who can report a concern is set out in paragraphs 2.2 and 2.3 of the policy. Concerns raised by members of

¹⁴ Throughout the rest of the guidance, the terms worker, or workers is used to mean anyone covered by the whistleblowing policy and the protections of PIDA.

the public or other groups would not be considered as whistleblowing. They should still be taken seriously though and directed to the relevant team. For example, the council's complaints, feedback and compliance team or counter fraud team.

- 2.6 Whistleblowing reports are often made anonymously. Where an anonymous report is made, you should try to encourage (but not pressure) the person to give their name. For example, if you are taking information by phone or have an email address you can respond to. Make it clear that it can be more difficult to investigate concerns if contact with the whistleblower is not maintained.
- 2.7 Concerns or complaints about councillors are not covered by the whistleblowing policy. They come under the council's Standards procedures. Any issues relating to councillors should be referred to the Monitoring Officer for advice.
- 2.8 If you are not sure whether an issue should be classed as whistleblowing then advice should be sought from Human Resources or Veritau¹⁵.

3 Reporting the receipt of a whistleblowing concern

- 3.1 Section 6 of the policy sets out what managers should do when they receive a whistleblowing concern. Managers should also notify their director or assistant director (or the chair of governors, for schools). They should also inform the Head of HR or HR manager responsible for their area.
- 3.2 If the issue involves any of the people named above then you should tell a more senior officer such as the Monitoring Officer, Section 151 officer, the Head of Internal Audit, the Corporate Director the Corporate Director, Adults and Safeguarding, or the Corporate Director, Children's and Education (in the case of schools).
- 3.3 Veritau maintains a central log of all whistleblowing reports received. Where a whistleblowing issue is handled within a service area or directorate, the outcome of any investigation and action taken should be reported to Veritau once the matter is completed.
- 3.4 If you are unsure about how to deal with a whistleblowing issue then you can seek advice from Veritau. Any complex issues, or any case involving fraud, corruption or theft should be reported to Veritau immediately. Veritau will determine how the issue should be investigated, in consultation with other relevant officers.

¹⁵ Veritau can be contacted by email on whistleblowing@veritau.co.uk

-
- 3.5 If you receive details of a whistleblowing concern raised with an external body (one of the prescribed persons and organisations set out in section 7 of the policy), the information should be forwarded to Veritau.

4 Initial response

- 4.1 If you are notified of a concern, you should acknowledge it immediately. Unless it was raised anonymously (with no way of responding) then this should usually be done by email. If you are notified verbally, you should try to find out as much information as possible and document it. Try to obtain contact details if possible. Where information is received in writing you should usually try to arrange a meeting with the whistleblower to gather further information.
- 4.2 This initial meeting can be done in person, in or outside of the council's offices, or by telephone. It is important to find an environment that the whistleblower feels comfortable with. They may be supported by a trade union representative or colleague. A note taker can be brought to the meeting with prior agreement from the whistleblower.
- 4.3 If anonymity is requested then every effort should be made to keep the whistleblower's identity concealed. However, anonymity cannot be guaranteed, and you should not promise this. If it becomes apparent that a whistleblower's identity may become known, then they should be told about this as soon as possible.
- 4.4 All information relating to a whistleblowing report or gathered during a subsequent investigation should be kept confidential. Information should only be shared on a strictly need to know basis.
- 4.5 A record of any meetings with the whistleblower should be made either contemporaneously or as soon as possible afterwards. These notes must be kept securely.
- 4.6 No commitments should be made about the process or outcome of a whistleblowing investigation. However, the whistleblower should be reassured that their concerns will be taken seriously.
- 4.7 Any additional information you obtain should be shared with the people you have already notified (paragraphs 3.1 and 3.2 above) or with Veritau, if the issue is to be referred to them.

5 Conducting an investigation

-
- 5.1 At the start of an investigation, the person looking into the issue should inform the whistleblower that they are investigating the matter.
 - 5.2 It is best practice to provide updates to the whistleblower on the status of the investigation while investigating. However, only limited information can be shared. The findings of an investigation and personal data about other people must not be shared. Nor can any information that may prejudice the investigation. In some cases, it may be better to wait until the end of the investigation before sharing any details (although personal data cannot be shared at any point).
 - 5.3 Notes should be made throughout the investigation about the action being taken and evidence collected. Conclusions should also be documented.
 - 5.4 The investigator should consider whether any action to be taken during the investigation is likely to lead to the identity of the whistleblower becoming known. If it becomes apparent that the investigation cannot be pursued without the whistleblower's identity becoming known, then they should be made aware of this before further action is taken. The whistleblower's name should only be made known to other people on a need-to-know basis.
 - 5.5 Investigations should be completed as quickly as possible. Where a whistleblowing investigation leads to other council processes being considered or commencing (such as a pre-disciplinary investigation) then relevant officers should be made aware at an early stage.
 - 5.6 At the conclusion of an investigation a report should be prepared setting out all of the evidence gathered and stating whether it confirms or contradicts the original issue raised. It should also set out the conclusions reached, and recommendations. The report should be shared with those notified of the issue originally (paragraphs 3.1 and 3.2 above). A copy should also be sent to Veritau to be logged.

6 Special circumstances

Safeguarding concerns

- 6.1 If a concern raised includes issues relating to safeguarding, then the manager notified should ensure that it is raised immediately through normal council safeguarding arrangements.

Anonymous concerns

- 6.2 If a concern has been made anonymously then it must still be treated as credible and dealt with through the procedure detailed in this guidance.

Negative treatment of the whistleblower

- 6.3 The council will not tolerate any negative treatment of whistleblowers. If any manager becomes aware of any mistreatment of a whistleblower, they should report this to the Head of HR or relevant HR manager as soon as possible. The council may be in contravention of whistleblowing legislation if action is not taken to address this behaviour.

Vexatious or malicious reports

- 6.4 If a whistleblower acts in bad faith or raises malicious, vexatious, or knowingly untrue concerns then they may be subject to disciplinary action. If you have reasonable grounds to suspect that this may be the case, then the matter should be reported to the Head of HR or relevant HR manager.

External disclosures

- 6.5 It is important to be supportive and encouraging to those raising a concern. However, if a worker indicates that they are considering taking their concerns outside of the council, for example to the media or social networking sites, you should advise them of the following:
- You may not be able to support them if they take this action
 - Their disclosure may not be covered by the whistleblowing policy and relevant legislation
 - Their action may represent an unauthorised disclosure
 - They could jeopardise any legal protection that they may have in law
 - They could be subject to disciplinary action themselves.
 - They should take specialist advice before doing so, eg from PROTECT.
- 6.6 If a whistleblower makes an external disclosure, then this should be reported to Veritau as soon as possible. Some types of disclosure are covered by legislation. However, consideration of whether the action taken is appropriate or not will need to be considered on a case-by-case basis.

Support

- 6.7 If you have any queries or issues about the investigation of a whistleblowing concern then you can seek further advice from Veritau.