



Whistleblowing and Speaking Up Policy

Lewisham Council Staff and Contractors

whistleblowing@lewisham.gov.uk



Lewisham

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 essential to us being a well-governed, ethical organisation. Your concerns will be taken seriously and 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 speaking up.

Policy Aims

This policy aims to:

- Encourage staff, Members, contractors, and partners to speak up on suspicions of wrongdoing as soon as possible, in the knowledge 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.

This policy covers those who can raise concerns internally. We encourage members of the public to report issues of concern through the [contact details on our website](#).

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](#) sets out some examples (known as *protected disclosures*).

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 speak up 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 wrong, as long as you are genuinely troubled by what you know.

Where can I raise other concerns?

This policy aims primarily to address concerns detailed in the Public Interest Disclosure Act. The Council has a range of other policies to support people raising other types of concerns.

- For concerns about your employment that affect only you or your immediate colleagues: please see the [grievance policy](#)
- For concerns about the safety or wellbeing of a child or vulnerable adult: please see the [safeguarding policy](#) or raise directly with the [Executive Director for Children & Young People](#) or [Executive Director of Community Services](#).
- For concerns about the quality or delivery of council services: please see the [complaints procedure](#).
- For concerns related to the conduct of Members: please see the [Council's Member Code of Conduct](#)

Protected Disclosure Types

- **Criminal activity** (such as theft, fraud)
- **Miscarriages of justice** (such as wrongly cancelling a parking ticket)
- **Dangers to health and safety** (such as faulty protective equipment)
- **Damage to the environment** (such as wrongful waste disposal)
- **A breach of legal duty**
- **Covering up or concealing any of the above**

Confidentiality and anonymity

We hope you feel comfortable raising a concern openly, but also accept you may wish to raise matters confidentially. Raising a concern confidentially means that although the person you report to will know who you are, we will not disclose that information to anyone else unless required by law (such as, to the police). **We will assume matters are being raised in confidence unless you tell us otherwise.**

It may not be possible to keep your identity confidential while completing a thorough investigation. For example, in instances where others will know the concern could only have been raised by you. In those circumstances, we will consult you on how to best proceed and take your wishes into account.

You can choose to raise your concern anonymously, without giving your name. However, this may make it more difficult for us to investigate your concern, give you feedback on outcomes and provide advice and support.

We will investigate all matters raised irrespective of whether they are raised openly, confidentially, or anonymously.

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. If for any reason you don't think it appropriate to raise with your manager (including where your manager is engaged in the concerning conduct or has not acted on previous reports) you can use any of the options set out below:

- The [Head of Assurance](#), or any member of the Internal Audit team.
- Any of the Council's Statutory Officers ([Chief Executive](#), [Executive Director of Corporate Resources](#), and [Director of Law, Governance & Elections](#)).
- Use the Council's reporting line whistleblowing@lewisham.gov.uk or the 24-hour Freephone hotline at 0800 0850119.

This policy aims to provide an internal route for staff to raise concerns. However, we recognise it may sometimes be appropriate to raise the matter externally and we provide a range of contact details later in this document.

We strongly encourage you to seek advice before reporting externally, especially before contacting the media. In any external contact, you should avoid divulging confidential or personal sensitive information. It is your responsibility to ensure any information you share externally is accurate, fair, and within the law.

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, it will be recorded and you will receive an acknowledgment 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 suitable, proportionate, and independent investigation led by trained staff. 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 recurring.

We will also 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.

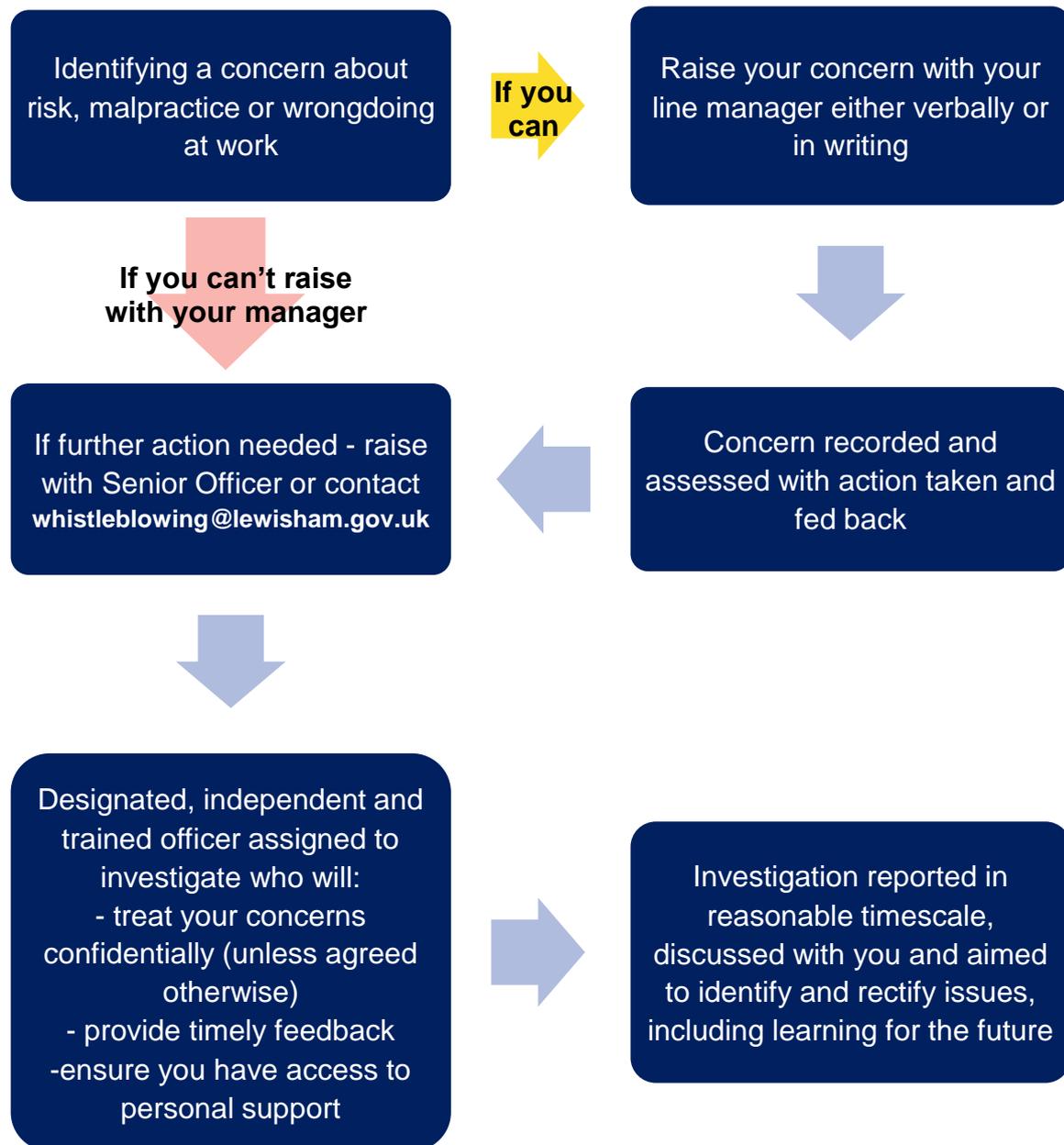
We understand that people raising honest concerns are sometimes worried about possible repercussions. We will not tolerate victimisation of people who raise concerns. Such actions are contrary to our values as a Council and may result in disciplinary action. If you are put under pressure to keep your concerns to yourself or suffer any detriment for speaking up you should report it to any Director or senior officer you wish, 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 the malpractice they have been involved in.

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 your concerns with the [Director of Law, Governance, and Elections](#) or the [Chief Executive](#).

Process Flowchart



Useful links and contact details

For Line Managers

- **Rich Clarke, Head of Assurance** rich.clarke@lewisham.gov.uk (020 8314 8730): Can provide advice on handling matters raised by staff.
- **Stephen Williams, Head of Information Security and Governance** stephen.williams@lewisham.gov.uk (020 8314 6212): Can provide advice on data protection and information handling for matters raised by staff.

For Staff with Concerns

- **Jennifer Daothong, Chief Executive** jennifer.daothong@lewisham.gov.uk (020 8314 9488): Responsible for overall management of the workforce.
- **David Austin, Acting Executive Director of Corporate Resources** david.austin@lewisham.gov.uk (020 8314 8627): The Council's officer with responsibility for financial management, audit and financial probity of the Council.
- **Jeremy Chambers, Director of Law, Governance and Elections** jeremy.chambers@lewisham.gov.uk (020 8314 7865): Dealing with advising on the probity and legality of the Council's decision-making and the Council's Monitoring Officer.
- **Rich Clarke, Head of Assurance** (see above): Responsible for overseeing internal audit and counter fraud and the Council's lead whistleblowing officer.
- **Reporting Line** whistleblowing@lewisham.gov.uk (0800 850 119)

External Contacts

- **KPMG** ([Appointed Auditor Fleur Nieboer](#)): the Council's external auditors, responsible for reporting on matters relating to fraud, corruption or misuse of public money.
- **Local Government and Social Care Ombudsman** ([website](#)): Final stage for complaints about local authorities.
- **Whistleblowing Helpline for NHS and Social Care** ([contact](#)): For raising concerns or advice on best practice.
- **Protect** ([website](#)): An independent charity dedicated to supporting whistleblowing and whistleblowers
- **Citizens Advice Lewisham** ([website](#)): Can support Lewisham residents with advice and support on a range of issues, including whistleblowing.

For concerns related to fraud

- **Carol Owen, Anti-Fraud & Corruption Team Manager**
carol.owen@lewisham.gov.uk (020 8314 7909): For advice and support on matters related to fraud.
- **Juliet Bennett, Housing Investigator** Juliet.bennett@lewisham.gov.uk (020 8314 3538): for matters related to housing or tenancy fraud
- **Reporting Line** reportfraud@lewisham.gov.uk (0800 850 119)

Version History

| # | Date | Lead Author | Notes |
|-----|--------|----------------------------------|---|
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