

CYNGOR GWYNEDD – Report to Cyngor Gwynedd Cabinet

Title item:	Whistleblowing Policy
Cabinet Member:	Councillor Llio Elenid Owen
Relevant Officers:	Eurig Williams / Jac Ynyr Evans
Meeting date:	20 January 2026

1. Decision Sought:

That Cabinet decides to adopt the revised Whistleblowing Policy set out in Appendix 1.

2. What is the reason Cabinet needs to take the decision:

Reviewing the policy and associated arrangements surrounding whistleblowing is a specific task within the Council's Crime Response Plan. The report is intended to recommend updates to the current Policy which will then be included in the Council's Constitution.

3. Background and Introduction

- 3.1 This policy and its arrangements are important as it relates to the Council's statutory duties and safeguards for "employees" under the Public Interest Disclosure Act 1998. It provides guidance to all staff, contractors as well as suppliers who carry out work for the Council on its premises on how to share a concern that they have about malpractice, inappropriate behaviour, or illegal activity within the organisation, while also explaining the steps taken to respond. The emphasis is on sharing information about issues that may be of public interest; the policy does not apply to personal employment matters, as there are different arrangements in place to assist staff with such issues.
- 3.2 The current policy was reviewed by a working group of officers from legal services, human resources, and internal audit during the autumn months of 2025. The content was also presented at the recent meeting of the Response Plan Programme Board for comment. The detailed policy can be found in Appendix 1 and reflects legal requirements and good practice.
- 3.3 In addition, the council is developing a relationship with the charity *Protect*, which is a body specialising in whistleblowing matters, with whom we will work for a number of years to regularly review the policy, and to implement it through a programme of raising awareness and training. In that regard, we will use *Protect* to measure how successful the arrangements are under the new policy, and to continuously review and further strengthen as is necessary. The charity can provide specialist support to us as an

employer but also to staff should they wish to receive advice from an independent body.

- 3.4 Should Cabinet agree to adopt the policy, then we will proceed to raise awareness through a comprehensive communications programme and also provide training to the workforce on the principles and implementation of the policy. This programme will be tailored to different cohorts of the workforce, with chief officers, assistant heads of departments, managers and team leaders for example receiving a different level of training to staff in general. However, all individuals will be required to have an understanding of this key area.
- 3.5 The trade unions have contributed to the review of the policy and are supportive of the revised copy shown at Appendix 1. If Cabinet were to adopt the policy, we would also need the involvement of the unions in raising awareness among staff.
- 3.6 In relation to schools, it is the responsibility of Governing Bodies to adopt and implement whistleblowing arrangements for their individual school. To this end the Welsh Government recommends a specific policy for them to adopt. Given that, the exact policy in question in Appendix 1 will not be in use within schools, but the council will have a responsibility in ensuring that all of Gwynedd's schools adopt the policy recommended by the Welsh Government.
- 3.7 The aim of all these steps is to make it clear to staff and contractors how they can whistleblowing in a safe environment, thereby gradually restoring public confidence in the council's arrangements in relation to such matters. Our relationship with *Protect will* be a means of securing an independent view on the strength of those arrangements.
- 3.8 This Policy addresses specific statutory requirements within a context of protecting employment rights. It is also recognised that there are other stakeholders who may wish to raise concerns with the Council, in particular elected members. This specific Policy, action or statutory safeguards underpinning the document do not apply to these groups, due to the nature of their relationship with the council, the leadership responsibilities, or specific requirements they have. There are other arrangements in place for elected members, which may be somewhat different to those arrangements considered as 'whistleblowing'. To assist members in familiarising themselves with the various procedures that exist, we are currently drafting further detailed guidance.
- 3.9 An impact assessment has been conducted, which is in Appendix 2. The assessment meets the requirements under various legislation including the Equality Act 2010. The

assessment does not identify any reasons to amend or to decide not to adopt the decision sought.

4. Statutory Officers' Remarks.

4.1 Chief Finance Officer

Having an effective Whistleblowing Policy, which is reviewed regularly, is a core component of the Council's governance arrangements and I support the decision sought. It will be ongoing work to ensure that everyone to whom this Policy is relevant feel confident in using it should the need arise.

4.2 Monitoring Officer

As set out in the report this review has been carried out in close collaboration with the Legal Services. The report and the Policy appropriately reflect this input. If the Policy is adopted, then I will move to place it in the Council's Constitution and report on the amendment to the Full Council for information as required