

Asesiad Effaith Cyfansawdd

This document assesses the impact that the policy, procedure, plan etc will have on the population of the county and operates on the basis of numerous pieces of legislation.

- **The Equality Act 2010.** It places a duty on public organisations to pay due attention to the impact of any new policy, procedure, scheme etc (or in adapting them) on people with protected characteristics, to:
 - abolish unlawful discrimination, harassment and persecution and other conduct prohibited by the Act.
 - promote equal opportunities between people who share a relevant protected feature and those who do not.
 - foster good relationships between people who share a protected trait and those who don't.

In Wales the specific duty sets out the need to carry out an impact assessment following specific guidelines to consider the impact that a change in any policy or procedure (or the creation of a new policy or procedure) will have on people with protected equality characteristics. A timely assessment must be made before a decision is taken on any material change (i.e. affecting people with a protected characteristic).

- **Socio-Economic Duty.** Wales has now implemented this duty which is part of the Equality Act 2010 giving a duty to address socio-economic disadvantage in strategic decisions.
- **Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011).** The Council is required to consider the impact that a change in any policy or procedure (or the creation of a new policy or procedure) will have on opportunities for people to use Welsh and to ensure that the Welsh language is not treated less favourably than English. This document therefore ensures that these decisions protect and promote the use of the Welsh language.
- **Well-being of Future Generations Act 2015.** The Council has a duty to implement the five ways of working, and to respond to the 7 national well-being goals.
- **the Armed Forces Act 2021.** Councils must give due regard to the impact of this proposal on those serving or having served in the Armed Forces, as well as their families.

Assessment: Whistleblowing Policy and associated Arrangements

Author: Eurig Huw Williams (GC)

Job Title: Human Resources Service Manager

Date: 8/1/2026

Version: January 2026 Version

STAGE I - Main Aims and Objectives of the Policy or Practice

1. What kind of document or procedure is being assessed?

- New or revised policies, practices or procedures (involving a change in service provision or employment practices)

2. What are the goals, objectives and intended outcomes of the policy or practice?

The aim of the policy is to ensure that robust arrangements are in place to enable staff, contractors and suppliers on Council premises to report concerns they have about malpractice, inappropriate behaviour or illegal activity within the Council, and to provide guidance on how

the Council will respond to such concerns. The review of the policy has focused on creating robust arrangements that meet the Council's statutory duties and protect employees under the relevant legislation.

3. Who are the main advisory groups (stakeholders)?

The policy applies to all Council staff, contractors, and suppliers on Council premises. The policy also refers to the further specific arrangement in place to enable elected members to share concerns. A group of officers were consulted to include the areas of legal, human resources, and finance, the trade unions on behalf of Council staff, as well as the Crime Response Board.

STEP 2 - Engagement Data and Impact Assessment

4. Has an attempt been made to comply with the duty to engage in accordance with what is described above and has sufficient information been gathered to proceed?

Yes

Details of engagement. Please note any consultation or engagement you have made or intend to do

Operation	Dates	Carmarthenshire
Reviewing the whistleblowing policy and associated arrangements is a specific task within the Council's Crime Response Plan. A group of officers were consulted to include the areas of legal, human resources, and	2025/26	The Crime Response Plan stems from the events leading up to the conclusions of the recent Practice Review report, which highlighted the need to strengthen

finance, the trade unions on behalf of Council staff, as well as the Crime Response Board.		whistleblowing arrangements among staff, including school staff.
Internal Audit Report	2024/25	The audit noted that more work needed to be done to raise awareness of the arrangements.

5. What information is available about the impact on each of the features and topics below?

	Relevant Evidence, Information and Data	Potential Positive and/or Negative Impact
Race	No specific evidence or information regarding the feature in relation to whistleblowing.	The policy and associated arrangements offer different avenues for people to contact Council officers to share concerns, and it is expected that this will have a positive impact. Those routes include the option to contact a range of officers, as well as a confidential email address. In addition, people will be able to contact a whistleblowing charity that is independent of the Council.
Disability	No specific evidence or information regarding the feature in relation to the whistleblowing.	There is a need to ensure that everyone has the confidence to be able to share information about concerns, and one way to do that is to ensure that there are several different approaches available, which meet everyone's equality needs. There are different channels and methods of communication in place to enable people to do so (more information is in the

		policy), and not everyone is required for example to share concerns in writing. This is expected to have a positive impact.
Gender	No specific evidence or information regarding the feature in relation to whistleblowing.	There is a need to be aware of the sensitivity of issues, and the different methods available to staff to share concerns are a positive step in giving people the confidence that they can share information in all sorts of circumstances. For example, it is recognised that members of staff would not wish to share a concern with a line manager of a different gender and that there are therefore different options for different situations.
Age	No specific evidence or information regarding the feature in relation to whistleblowing.	A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns.
Religion and belief	No specific evidence or information regarding the feature.	Women of certain religions may find it difficult to talk to some managers about whistleblowing issues, especially from the point of view of personal matters. A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns.
Sexual Orientation	No specific evidence or information regarding the feature.	Some people might feel uncomfortable trying to talk about certain issues with some people e.g. in circumstances of harassment. The policy is expected to have a positive impact.
Gender reassignment	No specific evidence or information regarding the feature.	We need to be aware of the possibility that people might feel uncomfortable and vulnerable when discussing very personal issues with others, for

		example with a line manager directly. The policy could have a potential positive impact by ensuring that there are a number of different avenues available for people to share concerns.
Marriage and Civil Partnership	No specific evidence or information regarding the feature.	A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns. This is expected to have a positive impact.
Pregnancy and Maternity	Women in particular may feel uncomfortable and vulnerable when raising concerns with others e.g. if there are allegations of sexual harassment.	A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns.
Skip to content _ Skip to footer	We are already ensuring that it is possible for people to share concerns through Welsh.	It will be possible for people to share concerns through different channels under the policy and its arrangements, entirely through the Welsh language if desired.
Socio-Economic Considerations	Nothing to add.	Nothing to add.
Those who serve or have served in the armed forces, together with their families	No evidence identified.	A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns.
Skip to footer	The policy can be used to ensure that human rights are respected and protected e.g. to report degrading treatment, the right to freedom of thought, belief and religion, and the right to protection from discrimination.	A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns. The policy relates specifically to providing assurance that information about concerns can be shared without tolerating victimisation then resulting from having done so.

Other	The policy relates specifically to providing assurances to people that unlawful behaviour, malpractice or unlawful behaviour can be reported within the Council, including matters relating to safeguarding.	A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns. The policy and its arrangements, as well as the upcoming awareness raising and training programme, will strengthen the knowledge of all those working for the Council about the importance of whistleblowing, and contribute towards providing assurance and confidence that the Council's ability to respond is improving. The work of raising awareness will ensure that there are user-friendly versions of the policy and guidance being created.
--------------	--	---

6. Are there any data or information gaps and if so, what are these and how are they intended to be addressed?

There is not enough data in relation to possible whistleblowing issues. This element will be strengthened through adopting of the policy, by gathering information on specific cases that will be reported under the policy arrangements. Any information gathering processes on such sensitive issues will meet the necessary requirements in terms of information management.

7. When considering other key decisions affecting these groups, is there a incremental effect (cumulative effect)?

The purpose of the policy is to strengthen the rights of all those who may find that they need to share concerns, and to ensure that they have the confidence to share information without victimisation.

8. What does the proposal include to show that you have given due regard to the Public Sector Equality Duty (to promote equal opportunities; help to eliminate discrimination, harassment or unlawful victimisation and foster good relationships and wider community cohesion) as covered by the 3 aims of the General Duty in the Equality Act 2010?

The whole purpose of the policy is to put arrangements in place that improve people's faith and confidence in whistleblowing methods, and increase people's confidence in how such issues are handled. Whistleblowing is specifically about ensuring that people who share concerns with the Council do not suffer any persecution for having done so. All of this is compatible with the Public Sector Equality Duty and seeks to give everyone equal opportunities to share information in a way that they are comfortable with.

9. How does the proposal show that due attention has been given to the need to address inequalities in the cause of socio-economic disadvantage? (Note that this is about closing inequality gaps rather than just improving outcomes for all)

A positive impact is possible by ensuring that there are a number of different pathways available for people to share concerns.

10. How does the proposal demonstrate action in accordance with the requirements of the Welsh Language Standards (Welsh Language (Wales) Measure 2011), not to treat the Welsh language less favourably than English, and to ensure opportunities for people to use Welsh? Also how will action be taken in accordance with the Council's language policy and strategy to take advantage of every opportunity to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

The policy ensures that Welsh speakers can submit concerns in their chosen language.

I 1. How does this proposal meet the requirements of the Well-being of Future Generations Act by implementing the five ways of working, and responding to the 7 national well-being goals including creating a More Equal Wales?

The policy is about ensuring that everyone's concerns are respected and taken seriously, and that the Council behaves responsibly at all times.

PHASE 3 - Procurement and Partnerships

I 2. Will this policy or practice be carried out in whole or in part by contractors or in partnership with other organisation(s)?

No

What action will be taken to comply with the General Equality Duty, Human Rights and Welsh language legislation and the Socio-Economic Duty in relation to procurement and/or partnerships?

Procurement:

Not applicable

Partnership:

Not applicable

STEP 4 - Dealing with Negative or Unlawful Impact and Strengthening the Policy or Practice

I3. In considering proportionality, does the policy or practice cause a significant positive or negative impact or create unequal outcomes?

Significant Positive Impact:

A positive impact in terms of strengthening the Council's whistleblowing arrangements, and building the confidence of the taxpayer in how the Council will respond to concerns.

Significant Negative Impact:

None have been identified.

I4. Any intentional negative impact and why it is believed that there is justification for such action (for example, on the basis of improving equal opportunities or fostering good relationships between those who share a protected characteristic and those who do not or because of objective justification or positive action

NO

15. Will any of the negative impacts identified count as unlawful but unavoidable discrimination (e.g. reduction of funding)?

N/A

Please note the reason for saying so and the justification for continuing

N/A

16. What other measures or changes could be included in order to strengthen or change the policy/practice to demonstrate that due consideration has been given to promote equal opportunities; helping to eradicate unlawful discrimination, harassment or persecution and foster good relationships and wider community cohesion; as addressed in the General Duty of the Equality Act 2010?

No comment at this time, but the policy will be monitored from its adoption.

17. What other measures or changes could be included to strengthen or change the policy/practice to demonstrate that due attention has been given to the need to reduce unequal outcomes as a result of socio-economic disadvantage?

No comment at this time but the policy will be monitored from its adoption.

18. What other measures or changes could be included to strengthen or change the policy/practice to demonstrate that due regard has been given to the need to increase opportunities for people to use the Welsh language and not to treat the Welsh language less favourably than English in accordance with the Welsh Language (Wales) Measure 2011 and to reduce or prevent any adverse effects that the policy/practice may have on the Welsh language?

No comment at this time but the policy will be monitored from its adoption.

19. Is there enough information to form a balanced view and move forward?

Yes

STEP 5 - Decide to Go Ahead

**20. Given the information gathered at Steps 1-4, is it possible to proceed with the policy or practice, and if so, on what basis?
Choice of:**

Continue the policy or practice in its current form

PHASE 6 - Actions and Arrangements for Monitoring Results and Reviewing Data

The AEC process is an ongoing one and does not end when the policy/practice and the AEC have been agreed and implemented. There is a specific legal duty to monitor the impact of the policies/practices on equality on an ongoing basis to identify whether the outcomes have changed since you introduced or modified this new policy or practice. If you do not have the relevant data, you should be taking action to correct this in your action plan. To view the EHRC's guidance on data collection you can review their [Measurement Framework](#)

21. What actions identified in Steps 1-5 or any additional data collection work will assist in monitoring the policy/practice when implemented:

Operation	Dates	Timeline		Add to Service Plan
Within the relevant legislative frameworks, gather information on ringing cases.	2026 /27	Yearly	Head of Corporate Services and Head of Legal Services	No

22. What arrangements to monitor and review the ongoing impact of this policy or exercise will be implemented, including timescales for when it should be formally reviewed:

Monitoring and Review Arrangements (including where the results will be recorded)	Timetable and Frequency		
Review the implementation of the policy.	Yearly	Head of Corporate Support Services and Head of Corporate Services	No