



LONDON BOROUGH OF ENFIELD
WHISTLEBLOWING POLICY

JUNE 2026

Reviewed:
Next Review:

M Cameron
Head of Internal Audit

June 2026
January 2028



Whistleblowing Policy

1 PURPOSE

- 1.1** The Council is committed to creating an open, transparent and safe working environment where workers feel able to speak up about concerns.
- 1.2** This Whistleblowing Policy (the Policy) sets out how individuals who work with or for the Council can raise concerns about wrongdoing, risk or malpractice in the public interest, and explains how those concerns will be handled. The raising of such concerns is referred to as 'whistleblowing'.
- 1.3** The Council is committed to:
- treating whistleblowing allegations seriously, professionally and fairly; and
 - ensuring that workers are not subjected to any detriment because of making a whistleblowing allegation.

2 WHISTLEBLOWING ALLEGATIONS

- 2.1** A whistleblowing allegation is a disclosure of information which the whistleblower reasonably believes is in the public interest and shows past, present or likely future wrongdoing in one or more of the following categories:
- criminal offences (e.g., theft, fraud, bribery)
 - failure to comply with any legal obligation
 - miscarriages of justice
 - endangering of someone's health or safety
 - damage to the environment
 - sexual harassment
 - deliberately concealing any of the above categories.
- 2.2** For the purposes of this policy, the term 'the public interest' means the wrongdoing must also affect others, such as other employees or workers, customers or the general public. Personal grievances and individual complaints are, therefore, not usually covered by whistleblowing legislation.
- 2.3** It is not usually good practice to make a whistleblowing allegation through an internal grievance, as grievance procedures are not designed to deal with this type of concern. A grievance can still amount to a whistleblowing allegation or contain a whistleblowing allegation if it meets the conditions in **2.1 above**. If you would like your grievance to be treated as a whistleblowing allegation then it would be helpful, but not necessary, if you stated this as part of your grievance.

Any non-whistleblowing concerns should be raised with your line manager or, if they relate to an elected member, they should be raised with the Monitoring Officer.

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- 2.4** This Policy is not intended for reporting safeguarding concerns involving children or vulnerable adults. Separate procedures are in place for raising such concerns (see **Section 10**).

3 WHO IS COVERED BY THIS POLICY

- 3.1** This Policy applies to all Council employees, workers, agency staff, contractors, elected members and anyone else carrying out work for or on behalf of the Council in a worker-like capacity. It also extends to organisations that deliver services under contract to the Council, including providers such as care homes operating on their own premises.
- 3.2** Schools have their own whistleblowing policies. They may choose to adopt the model policy provided by the Council's Schools HR Service.

4 HOW TO MAKE A WHISTLEBLOWING ALLEGATION

Internal route

- 4.1** When making a whistleblowing allegation you should ensure you provide as much factual detail as possible (such as who, what, when, where and how). Submitting whistleblowing allegations in writing is encouraged for clarity. All allegations will be treated consistently and fairly.
- 4.2** If you are an employee or worker, it is recommended you make your disclosure to your immediate manager in the first instance, or to the next level of management if the concern relates to your line manager. If you believe the matter is extremely serious or sensitive, you may report it directly to your Director or Executive Director. Alternatively, you can raise your concerns with any of the people listed in the table below.

If you are not an employee or worker, you can raise your concerns with any of the people listed in the table below.

POSITION	POST HOLDER	EMAIL	PHONE
Monitoring Officer - Director of Law and Governance	Terry Osborne	terry.osborne@enfield.gov.uk	020 8132 0668
Head of Internal Audit	Marion Cameron	marion.cameron@enfield.gov.uk	020 8132 1065

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POSITION	POST HOLDER	EMAIL	PHONE
Section 151 Officer – Chief Finance Officer	Olga Bennet	olga.bennet@enfield.gov.uk	020 4522 9995
HR – Director of Human Resources	Tinu Olowe	tinu.olowe@enfield.gov.uk	020 8132 3154
Chief Executive	Perry Scott	perry.scott@enfield.gov.uk	020 8078 2834

- 4.3** Additionally, concerns can be emailed directly to SpeakOut@enfield.gov.uk. This is a dedicated email inbox for receiving whistleblowing concerns and is monitored by senior Counter Fraud officers, who will maintain confidentiality at all times. 'SpeakOut' can also be used to submit whistleblowing allegations anonymously.
- 4.4** All allegations concerning fraud or financial irregularity may be made directly to the Counter Fraud team at fraud.team@enfield.gov.uk.
- 4.5** You may choose to remain anonymous, but this may affect the investigation into your disclosure and the level of feedback that we are able to provide. It may not be possible to investigate anonymous complaints.

External route (where internal routes are not appropriate)

- 4.6** If you have exhausted all internal routes and still have concerns, or if you feel unable to raise the matter with any of the individuals listed above and need further advice, you can contact:
- [ACAS](#) (an independent and impartial organisation that helps to improve the working life of employers and businesses; **or**
 - [Protect](#) (the UK's leading whistleblowing charity providing confidential advice and support to workers raising concerns about wrongdoing at work); **or**
 - an appropriate [prescribed person/body](#) under the Prescribed Persons Order.

The full list can be found at gov.uk but includes:

- External Auditor: paul.dossett@uk.gt.com
- Comptroller and Auditor General (NAO) for public spending
- Information Commissioner's Office for data protection
- Health and Safety Executive
- Environment Agency.

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- 4.7** If you choose to raise the matter outside the Council, you must take care not to disclose any sensitive or confidential information that would put you in breach of Data Protection regulations.

5 HOW YOUR CONCERN IS HANDLED

Whistleblowing allegation reports

- 5.1** Anyone who receives a whistleblowing allegation must notify the Audit, Fraud and Insurance Service at SpeakOut@enfield.gov.uk as soon as possible so that a record can be kept of the allegation and an initial assessment made.
- 5.2** The initial referral will usually be acknowledged by either the Head of Internal Audit or the Counter Fraud Manager within 5 working days of receipt, or in some cases by the Monitoring Officer.
- 5.3** All whistleblowing allegations will be assessed by the Head of Internal Audit (or by the Counter Fraud Manager or Monitoring Officer) in the first instance to determine what steps will be taken in relation to the allegation, if any. These officers may consult with others if they wish.
- 5.4** You will normally be informed whether any further action will be taken in respect of your allegations but in some cases that may not be possible e.g. where an investigation might be compromised or where the matter contains personal information.
- 5.5** Where appropriate, an officer (who may be separate from the whistleblower's area of work), or an independent person will be appointed to carry out the investigation.
- 5.6** Anyone tasked with investigating whistleblowing allegations may contact you to obtain further information and may wish to speak to you. They will also speak to others who are the subject of the allegation or who may be a witness.

Remedial action

- 5.7** The Council will take remedial and preventative action where wrongdoing is substantiated.

Confidentiality

- 5.8** All reasonable steps will be taken to protect confidentiality where this is requested, unless we are legally required to disclose information. If it becomes necessary to disclose your identity to progress an investigation (for example, if you are required to be a witness), this will be discussed with you in advance.

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Support

- 5.9** Anyone raising concerns is entitled to support where appropriate (e.g., union representation at disclosure meetings, or access to HR).

Recordkeeping, reporting and data protection

- 5.10** Anyone who receives or investigates a whistleblowing allegation must keep secure records of concerns, decisions and actions taken, in line with retention schedules and data-protection law.
- 5.11** The Audit, Fraud and Insurance Service will maintain the Council's central record of whistleblowing concerns raised.

Simultaneous procedures

- 5.12** Whistleblowing allegations may be treated separately or in conjunction with other action or procedures or investigations.
- 5.13** Other protective or investigative procedures may, if necessary, be invoked in parallel with this policy in relation to any allegation such as safeguarding, complaints, grievance or disciplinary procedures.
- 5.14** The submission of a whistleblowing allegation by an employee under this policy does not prevent the Council from commencing, continuing or concluding any management action regarding that employee, subject to any protection offered to the employee under the Public Interest Disclosure Act (see **Section 6**).
- 5.15** Any investigation of an allegation made pursuant to this policy will be conducted independently from and will not influence, nor be influenced by, any existing disciplinary, capability, or redundancy procedures affecting you.

6 LEGAL FRAMEWORK AND GUIDANCE

- 6.1** **The Public Interest Disclosure Act (PIDA) 1998** protects workers from dismissal or detriment when they make a protected disclosure under the Act.

- 6.2** The Act does not require:

- the employee to label their concern as 'PIDA' or 'whistleblowing', or
- the employer to confirm that PIDA applies.

If a worker's disclosure meets the legal tests set out in the Act, then it is protected under the Act, whether or not anyone realises it at the time.

- 6.3** The law provides workers with the right to take a case to an employment tribunal if they have been victimised at work or dismissed because they have raised concerns as a whistleblower.

- 6.4** For further information refer to:

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- [The Law - Whistleblowing at Work - ACAS](#)
- [Whistleblowing: Guidance for Employers and Code of Practice](#).

- 6.5** Even if a whistleblowing allegation is not substantiated, you are protected by the Public Interest Disclosures Act 1998, and no adverse action can be taken against you. However, if allegations are found to be deliberately false or malicious these may be treated as a disciplinary matter.

7 COMPLAINTS

- 7.1** If you believe you are being, have been, or may be victimised, dismissed, made redundant, or otherwise disadvantaged because of making a whistleblowing allegation, you should raise this with the Head of Internal Audit or the Counter Fraud Manager. The issue will then be treated as a new referral under this policy.
- 7.2** Any instance where anyone is found to have suffered detriment as a result of making a whistleblowing allegation will be treated seriously and managed appropriately.

8 TRAINING AND AWARENESS

- 8.1** The Council will ensure that:
- appropriate training is available for managers who may receive whistleblowing allegations to ensure these are dealt with appropriately and in line with this policy and legislation
 - this policy, and the SpeakOut@enfield.gov.uk email, is promoted to all those who work for or on behalf of the Council.

9 MONITORING AND REVIEW

- 9.1** The Monitoring Officer will oversee this policy, supported by Internal Audit, Counter Fraud and Human Resources.
- 9.2** This policy will be reviewed at least **every two years**, or sooner if required due to legislative or organisational changes.

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10 RAISING SAFEGUARDING CONCERNS

AREA	PHONE	EMAIL	FURTHER INFORMATION
SAFEGUARDING CHILDREN (for reporting suspected child abuse)	- Police on 999 for immediate risk - the Enfield Multi Agency Safeguarding Hub (MASH) on 020 8379 5555		https://cp.childrensportal.enfield.gov.uk/web/portal/pages/home
SAFEGUARDING ADULTS with care and support needs (for reporting suspected abuse or neglect)	020 8379 3196 (Monday to Friday from 9am to 5pm) - Enfield Adult Abuse Line (24/7): 020 8379 5212 (option to make anonymous referral)	themashteam@enfield.gov.uk	Report abuse online Enfield Council Referral System More information is available here .
PERSON IN A POSITION OF TRUST (PIPOT) For concerns of suitability to work with adults with care and support needs, rather than a specific safeguarding concern		safeguardingadults@enfield.gov.uk	
TRADE UNIONS	UNISON: 020 8379 4084 GMB: 020 8202 8272	office@enfieldunison.co.uk. branch@gmbenfield20.org.uk	