



LANCASHIRE

COMBINED COUNTY
AUTHORITY

Whistleblowing Policy

Document Control

Title	Whistleblowing Policy
Document Type	Policy
Author	Andrew Dalecki
Owner	Andrew Dalecki
Created	December 2025
Review Date	September 2026

Revision History

Version	Date	Author	Description of Change

Policy Governance

Version	Governance Group	Date Approved
V1.0	Audit and Governance Committee	January 2026

Contents

1. Introduction.....	4
2. Aims and Scope	4
3. What is Whistleblowing	5
4. Making a disclosure or raising a concern	6
5. Making an External Disclosure to the Regulator	7
6. Concerns Raised by Members of the Public	8
7. How to report a Whistleblowing concern.....	8
8. How LCCA will respond	9
9. Anonymous allegations	10
10. Outcomes.....	10
11. Confidentiality and Anonymity.....	11
12. Harassment and Victimisation.....	11
13. Malicious Allegations	12
14. Misuse of the Policy	12
15. Monitoring of Whistleblowing reports	13
16. Training and Awareness.....	13
Appendix A – Nolan Principles of Public Life	14

1. Introduction

Lancashire Combined County Authority (LCCA) is committed to the highest possible standards of honesty, openness and accountability and will not tolerate malpractice or wrongdoing.

Whistleblowing is generally the term used when someone who works in an organisation reports a concern about suspected wrongdoing, malpractice, illegality or risk in the workplace.

The LCCA's Whistleblowing Policy is a vital element of our governance arrangements and is designed to allow people to come forward and raise both disclosures and serious allegations of wrongdoing involving the actions of LCCA employees, its Members, contractors or any aspect of LCCA's activities.

As such the LCCA is committed to a policy which seeks to protect those individuals who make certain disclosures with regard to any instance of malpractice or wrongdoing and to investigate them in the public interest.

This policy seeks to set out how the LCCA will handle and respond to serious allegations of perceived wrongdoing raised by employees, members and workers of the LCCA.

2. Aims and Scope

Our Whistleblowing Policy seeks to cover all disclosures and allegations made by employees of the LCCA, including temporary and agency staff.

It also extends to any other individuals who work for the LCCA who want to raise an allegation of perceived wrongdoing, including consultants, contractors and sub-contractors who are engaged in work for the LCCA.

The policy seeks to:

- provide for a culture of zero tolerance toward fraud and corruption and deter wrongdoing;

- encourage employees and workers with serious concerns about any aspect of the LCCA's work to feel confident to come forward and voice those concerns;
- raise concerns at an early stage and in the right way ensuring that critical information gets to the people who need to know and who are able to take action;
- provide safeguards to reassure those who raise concerns in the public interest and not maliciously or for personal gain, that they can do so without fear of reprisals or victimisation or disciplinary action, regardless of whether these are subsequently proven;
- set out how the LCCA will respond to allegations made and enable them to get feedback on any action taken;
- ensure that employees and workers know what to do if they are not satisfied with actions taken.

The Whistleblowing Policy is not to be used where other more appropriate internal reporting procedures are available. There are existing LCCA procedures which enable employees to lodge a grievance relating to their conditions of employment, raise matters of harassment or to make a general complaint, which by contrast, generally have no additional public interest dimension.

This Whistleblowing Policy covers concerns that fall outside the scope of those existing internal procedures. Equally, the LCCA will investigate any allegations made through the above procedures, which raise serious concerns over wrongdoing, under the whistleblowing process.

Any individuals who have concerns related to money laundering offences, the Proceeds of Crime Act 2002, or the Economic Crime and Corporate Transparency Act 2023 are obligated to report these concerns directly to the Money Laundering Reporting Officer (MLRO) in accordance with the Anti-Money Laundering Policy.

3. What is Whistleblowing

Whistleblowing is the confidential disclosure by an employee or worker of any concerns relating to a perceived wrongdoing involving any aspect of the LCCA's work or those who work for the LCCA. The whistleblowing process assists individuals, who believe they have discovered malpractice, impropriety or wrongdoing, to raise a concern, in order that this can be addressed.

The Public Interest Disclosure Act 1998 (PIDA) is known as the whistleblowing law and is designed to encourage and enable employees and workers to “speak out” and to report suspected wrongdoing at work. This is commonly known as “blowing the whistle”.

PIDA legislation legally protects employees and workers from any detriment from their employer or colleagues that arises as a result of making a “protected disclosure” (a

qualifying disclosure) in the public interest. This includes protection from harassment, victimisation or dismissal by their employer.

A qualifying disclosure means any disclosure of information made to the LCCA or other prescribed person, which in the reasonable belief of the individual making the disclosure, is made in the public interest and tends to show one or more of the following:

- a) a criminal offence has been committed, is being committed or is likely to be committed;
- b) a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- c) a miscarriage of justice has occurred, is occurring or is likely to occur;
- d) fraudulent or corrupt activity has occurred or is occurring;
- e) unethical conduct and actions deemed unprofessional or inappropriate; this could include breaches of regulations and of the 'Nolan Principles' which are the basis of ethical standards expected of public office holders (see Appendix A);
- f) the health or safety of any individual has been, is being or is likely to be endangered;
- g) the environment has been, is being or is likely to be damaged as a result of the LCCA's actions; or
- h) information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

A disclosure of information is not a qualifying disclosure if the person making the disclosure commits an offence by making it.

Whilst protection under the PIDA covers employees and most workers it is not extended to partners, non-executive directors, volunteers or the self-employed. However, the principles outlined in this policy, as far as they can be, will be applied to whistleblowing allegations received from sources other than employees and workers of the LCCA. As with internally reported cases, particular consideration needs to be given to matters of confidentiality.

4. Making a disclosure or raising a concern

Where possible people should raise concerns in writing, however raising a concern verbally also counts as whistleblowing. Wherever possible, the information provided should include the background and history of the concern, provide names, dates and places where possible, and the reason why the individual is particularly concerned about the situation.

The earlier someone expresses a concern, the easier it will be to take action. Individuals should raise a concern as soon as there is a reasonable suspicion; they are not expected to investigate the concern themselves to prove the suspicions are well-founded.

Providing genuine concerns are being raised it does not matter if the person raising the concern is mistaken.

It is the hope and intention of the LCCA that any employee or worker with a concern about any aspect of the LCCA's operations or its conduct, feels able to first raise those concerns internally with line management. It is also possible to raise concerns with one or more of the officers listed below. This includes where a person wants to make a protected disclosure about their manager. Statutory Officers' details are available on the LCCA website via this link [Statutory Officers of the Combined County Authority](#).

- Head of Internal Audit
- The LCCA Monitoring Officer
- The LCCA Section 73 Officer (Finance)
- The Chief Operating Officer
- Head of Paid Service

Details of all concerns received should be reported to the Internal Audit Team to be logged; allowing a central record of whistleblowing cases to be maintained.

5. Making an External Disclosure to the Regulator

If a person does not feel comfortable making a disclosure internally within the LCCA, or if they are not satisfied with the response they have received, they have the right to take their concerns outside of the LCCA to certain 'prescribed person / regulators'.

A prescribed person is someone identified in regulations who is independent of the organisation, but usually has an authoritative relationship with the organisation, such as a regulatory or legislative body.

Below is a list of 'prescribed regulators' to whom an employee or worker may make a protected disclosure.

[List of prescribed people and bodies.pdf](#)

In making a protected disclosure to a regulator a person must:

- reasonably believe that the disclosure they are making is in the public interest;
- reasonably believe that the information detailed and any allegation in it are substantially true; and
- the matter disclosed must fall within the matters prescribed for that regulator.

6. Concerns Raised by Members of the Public

Although this process is mainly intended for use by employees of the authority, its partners and those organisations who contract to provide services on the authority's behalf, members of the public may use the same processes to report any concerns or disclosures over wrongdoing and these will be treated in the same way. However, this process is not intended to replace LCCA's complaints procedure. Therefore, the Authority will not consider any complaints that have already been or are currently being addressed under the Authority's complaints procedure.

7. How to report a Whistleblowing concern

The first step for an employee is normally to raise concerns with their immediate supervisor/ manager. However, this may depend on the seriousness and sensitivity of the issues and who is believed to be involved. For example, if it is believed that management is involved, then a more senior level of management should be approached within the service.

Any person reporting a concern should provide as much information as possible, including:

- who the allegations are against;
- full details on the nature of the alleged wrongdoing;
- provide any evidence they have in support of the allegation;
- state if the person making the disclosure is a LCCA employee or worker;
- name and contact details, unless they wish to remain anonymous (if contact details are provided the investigating officer may get in touch to seek further information).

In the event that someone does not feel comfortable making a disclosure to the LCCA then a protected disclosure may be made to the appropriate prescribed organisation from those listed below: [List of prescribed people and bodies.pdf](#)

An employee may also invite their trade union or professional association to raise a matter on their behalf.

Non-employees (e.g. agency workers or contractors) should raise a concern in the first instance with their contact within the Authority, usually the person to whom they directly report:

- Email: confidentialreporting@lancashire-cca.gov.uk
- Online Contact form, accessed here: [Contact | Lancashire Combined County Authority](#) (select whistleblowing option)
- Concerns can also be made in writing. Correspondence should be sent to:

Lancashire County Combined Authority
County Hall
Preston
PR1 0LD

All whistleblowing cases referred to managers must be reported upon receipt to Internal Audit. This may be done by the whistleblower or the receiving manager. Internal Audit will review the report to ensure that it is investigated appropriately and proportionately. Depending on the matters raised, the investigations may be conducted by:

- Internal Audit,
- Management,
- The disciplinary or other appropriate process,
- The police,
- The external auditor, and/or
- An independent inquiry.

If a concern has been reported to a manager the manager should:

- Listen to the concerns and treat every report seriously and sensitively.
- Reassure staff that their concerns will be taken seriously and passed on to be investigated.
- Ask the person for current contact details and ask them how they want to be contacted.
- Obtain as much information as possible from the person, including any notes or evidence to support the concern. Do not interfere with this evidence and ensure it is kept securely.
- Do not attempt to investigate the matter yourself or attempt to obtain any further evidence.
- Report the matter immediately to Internal Audit or email confidentialreporting@lancashire-cca.gov.uk

8. How LCCA will respond

In cases where contact details are available the whistleblower will be contacted. The LCCA will aim to do this within ten working days. The LCCA will provide the following information:

- Acknowledgment that the concern has been received.
- An indication of how the authority propose to deal with the matter.
- An estimate of how long it may take to provide a final response.
- Details of staff support mechanisms available.

- An update as to any initial enquiries that have been made and what possible further investigations will take place or reasons why further investigations will not take place.

The amount of contact between the whistleblower and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the authority will seek further information.

Where any meeting is arranged, the whistleblower can be accompanied by a fellow worker, a trade union representative or an official employed by a trade union.

The authority will take steps to minimise any difficulties which people may experience by raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings the authority will arrange for them to receive advice about the procedure.

9. Anonymous allegations

The LCCA recognise that there may be circumstances where individuals are worried about being identified when they report concerns about their employer. We will treat anonymous allegations seriously. However, this policy encourages individuals to put their name to an allegation wherever possible as we believe that open or confidential whistleblowing is the best means of addressing the concerns and protecting individuals.

Concerns expressed anonymously are more difficult to investigate, and harder to substantiate, as further liaison with the whistleblower is not possible. Nevertheless, anonymous allegations will always be individually considered and action taken when possible.

10. Outcomes

The LCCA will, subject to legal constraints, seek to advise the whistleblower on the outcomes of the investigation in order to assure them that the matter has been properly addressed. The LCCA will not usually provide the whistleblower with all the details of investigation outcomes as this could breach others' rights to confidentiality e.g. if disciplinary action has been taken against an individual. Some concerns raised may be resolved by agreed action, once the whistleblower's concerns have been explained, without the need for investigation.

Investigation is concluded a report will be required. These will usually be issued by the Investigating Officer in confidence under restricted circulation including the Monitoring Officer and Senior LCCA Officer of the department involved.

Reporting the outcomes of an investigation is restricted as the content of investigation reports could include personal information of others, commercially sensitive information or details of investigation processes and practices the publication of which could prejudice the effective conduct of future investigations.

Where investigations are completed by managers within a department, Internal Audit will require confirmation of the outcome from the work undertaken, details of any system risk issues and actions to be taken to mitigate future reoccurrences. Internal Audit may carry out follow up work as a result of any identified areas of risk.

11. Confidentiality and Anonymity

In order to ensure that allegations are investigated in the right spirit with the right outcome, the following safeguards or principles should be applied in all cases. The LCCA's Whistleblowing Policy seeks to protect the identity of the employee or worker making a disclosure wherever possible.

Records of employee or worker's disclosures held by Internal Audit are stored securely; access to whistleblowing and related investigation records is restricted to specific officers assigned to examine the concerns being raised. Wherever possible the identity of an employee or worker raising a concern will not be revealed as part of an investigation. Should this not be possible the employee or worker will be notified and consent will be sought before-hand.

Circumstances which may require the disclosure of an employee or workers identity, and override their request for confidentiality, include disclosures related to any child at risk or abuse of a vulnerable adult. LCCA is required to investigate these matters under separate procedures which take priority over any request for confidentiality.

The LCCA cannot guarantee to protect the identity of someone raising allegations of serious wrongdoing where a criminal offence has been committed, and legal/prosecution action results from disclosure. In some cases an employee may have to act as a witness and/or provide evidence in relation to criminal offences which are investigated and or referred to prosecution.

Progress reports are submitted to the Audit Risk and Governance Committee which include details of investigations. In such circumstances these are anonymised.

12. Harassment and Victimisation

LCCA acknowledges that the decision to report a concern can be a difficult one for an employee or worker to take, not least because of the fear of reprisal from those

responsible for the malpractice. It is unlawful for an employee or worker to suffer victimisation or harassment for whistleblowing.

LCCA will not tolerate harassment or victimisation against an employee who has raised a genuine concern under the whistleblowing policy. Victimisation may include an attempt to identify the person raising the concern. Any employee who victimises a whistleblower will be subject to disciplinary action which may lead to dismissal. An individual may also be personally liable for treating a colleague detrimentally on the grounds that they have raised public interest concerns.

Senior LCCA Officers should monitor how whistleblowers are subsequently treated after raising a matter of concern. They should ensure that any harassment or victimisation is dealt with under disciplinary arrangements.

Any employee who believes they have been victimised as a result of making a disclosure or blowing the whistle should report their concerns to the LCCA Monitoring Officer.

13. Malicious Allegations

If a person makes an allegation which they genuinely believe is in the public interest, but investigations later show that the allegation is unfounded, it is important that the person is reassured that they have done the right thing. The LCCA encourages people to raise any concern when they have a genuinely held belief wrongdoing has occurred. If, however, an allegation is made frivolously, maliciously or for personal gain, appropriate action could be taken against them. This includes disciplinary action if they are an authority employee. If they are an elected member, they may have breached the Code of Conduct for members. If they are a contractor or partner, such allegations may put them in breach of their contractual responsibilities to the LCCA.

14. Misuse of the Policy

The policy is not designed to allow:

- individuals who have acted inappropriately to escape punishment by highlighting any malpractices they were involved in;
- employment protection in relation a redundancy situation or pre-existing disciplinary issues as a result of reporting a wrongdoing;
- an individual to raise a concern for some private or purely personal motive.

This policy is not intended to be used where other more appropriate procedures are available. These may include, but are not limited to:

- Disciplinary Procedure
- Equal opportunities complaints procedure

- Harassment policy and procedure
- Corporate Complaints Policy
- Grievance policy and procedure

Employees raising whistleblowing concerns relating to another relevant policy will still receive the protections of this policy even when the issues are to be investigated and dealt with under another process.

15. Monitoring of Whistleblowing reports

Internal Audit will maintain a central record of all whistleblowing referrals made under this policy and monitor the outcome of these cases. The collection, monitoring, review and storage of these records will at all times be carried out in accordance with the safeguarding principles set out in this policy.

As such, details of any allegation should be reported to Internal Audit by the receiving manager on receipt. Internal Audit will log and allocate each case a reference number whether or not Internal Audit are involved in the investigation work. The outcome of the investigation should be notified to Internal Audit by the Investigating Officer.

The records held by Internal Audit will be used to analyse the impact and effectiveness of the arrangements in place in statistical terms and records held in the HR section may be subject to review. The detailed case records form part of the process of reporting back to Members on the effectiveness and outcomes of the Policy and form the record of actions taken in the case of any matters raised under the Public Interest Disclosure Act. This information will be referred to for monitoring purposes and periodic assurance reports provided to the Audit Committee by the Head of Audit as part of this process.

The LCCA Monitoring Officer retain responsibility for monitoring the effectiveness of the LCCA's whistleblowing policy and process. The Audit Risk and Governance Committee has an overview of the Policy.

16. Training and Awareness

Senior LCCA Officers are responsible for ensuring that their employees are aware of the whistleblowing policy and process and that any training needs are addressed which may arise from the application of the policy. Raising awareness of the LCCA's Whistleblowing Policy should form part of the induction training for all employees and should be addressed as refresher training for all employees.

Employees and workers have a responsibility to ensure that they are aware of and understand the LCCA's policy in relation to whistleblowing.

Appendix A – Nolan Principles of Public Life

The following are the Seven Nolan Principles underpinning standards for Public Life:

The principles of public life apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the civil service, local government, the police, courts and probation services and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public services. The principles also have application to all those in other sectors delivering public services.

1. **Selflessness:** Holders of public office should act solely in terms of the public interest.
2. **Integrity:** Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
3. **Objectivity:** Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
4. **Accountability:** Holders of public office are accountable to the public for their decisions and actions and must admit themselves to the scrutiny necessary to ensure this.
5. **Openness:** Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
6. **Honesty:** Holders of public office should be truthful.
7. **Leadership:** Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Source: The Committees website is at <http://www.public-standards.gov.uk/>