



Seaford Town Council

Seaford Town Council Personnel Agenda – 9 October 2025

To the Members of the Personnel Committee

Councillors S Markwell (Chair), O Matthews (Vice Chair), L Boorman, S Dubas, O Honeyman, R Honeyman and L Wallraven

A meeting of the **Personnel Committee** will be held in the **Council Chambers, 37 Church Street, Seaford, BN25 1HG** on **Thursday, 9 October 2025** at **7.00pm**, which you are summoned to attend.

Steve Quayle,
Town Clerk

3 October 2025

PLEASE NOTE:

- **Public attendance at this meeting will be limited to 15 people although please note that in accordance with the Town Council's Public Participation Policy, there will be no agenda item for public participation.**
- **Public arrival time is between 6.45pm – 6.55pm, after which the front door will be locked and public will not be able to gain access to the meeting.**
- **Due to its confidential nature, the meeting will not be video recorded.**
- **See the end of the agenda for further details of public access.**

AGENDA

1. Apologies for Absence

To consider apologies for absence.

2. Disclosure of Interests

To deal with any disclosure by Members of any disclosable pecuniary interests and interests other than pecuniary interests, as defined under the Seaford Town Council Code of Conduct and the Localism Act 2011, in relation to matters on the agenda.

3. Whistleblowing Policy Review

To consider report 85/25 presenting the revised draft Whistleblowing Policy for review and recommendation to Full Council to adopt (pages 4 to 21).

4. Exclusion of the Press & Public

The Chair will move that in accordance with the Public Bodies (Admission to Meetings) Act 1960, the press and public be excluded from the meeting during the discussion on the next item of business for the reasons as set out below.

The resolutions of the item will be recorded publicly in the minutes of this meeting.

The Proper Officer considers that discussion of the following items is likely to disclose exempt information as defined in the Local Government Act 1972 and Data Protection legislation and may therefore need to take place in private session. The exempt information reasons are shown alongside each item below.

Furthermore, in relation to paragraph 10 of Schedule 12A, it is considered that the public interest in maintaining exemption outweighs the public interest in disclosing the information.

5. General HR Update - October 2025 EXEMPT

To consider exempt report 83/25 providing the Committee with an update on HR matters within the Town Council (exempt pages).

Reason for exemption: to provide confidential updates surrounding the Human Resources functions of the Town Council.

Explanation of Reason: under Data Protection legislation, information about an individual member of staff / groups of staff is confidential between the Town Council and staff member/s.

AGENDA NOTES

For further information about items on this Agenda please contact:

Steve Quayle, Town Clerk, 37 Church Street, Seaford, East Sussex, BN25 1HG

Email: meetings@seafordtowncouncil.gov.uk

Telephone: 01323 894 870

Circulation:

All Town Councillors and registered email recipients.

Public Access:

Members of the public looking to access this meeting will be able to do so by:

1. Attending the meeting in person.

Due to health and safety restrictions, the number of public in attendance will be limited. The Town Council therefore asks that you contact

meetings@seafordtowncouncil.gov.uk or 01323 894 870 to register your interest in attending at least 24 hours before the meeting.

Spaces will be assigned on a first come, first served basis.

Please note that if you don't register and just attempt to turn up at the meeting, this could result in you not being able to attend if there is no space.

Public Access to the Venue:

If you are attending the meeting in person, please arrive between 6.45 – 6.55pm where you will be shown into the meeting for a 7.00pm start.

Public Participation:

In accordance with the Town Council's Public Participation Policy, there will be no public participation at this meeting.

Public Comments

Members of the public looking to submit comments on any item of business on the agenda can do so in writing ahead of the meeting and this will be circulated to all councillors.

Comments can be submitted by email to meetings@seafordtowncouncil.gov.uk or by post to the Town Council offices.



Seaford Town Council

Report No:	85/25
Agenda Item No:	3
Committee:	Personnel
Date:	9 October 2025
Title:	Whistleblowing Policy Review
By:	Darryl Keech, Deputy Town Clerk & RFO
Purpose of Report:	To present the revised draft Whistleblowing Policy for review and recommendation to Full Council for adoption

Actions

The Committee is advised:

1. To consider and discuss the draft Whistleblowing Policy presented with this report.
2. To move to a vote on the motion below.

Recommendations

The Committee is recommended:

1. To recommend that Full Council adopts the draft Whistleblowing Policy.

1. Information

- 1.1** At its meeting in March 2025, Full Council deferred consideration of a draft Whistleblowing Policy back to the Personnel Committee.
- 1.2** At its May 2025 meeting, the Personnel Committee was provided with an update on the policy and advised that, unfortunately due to ongoing HR personnel changes, a revised draft was unable to be provided at that time.
- 1.3** Councillors advised the officers to move away from the previously presented draft policy and that a new policy would need to be created

ensuring that the tone was consistent and that the policy was more detailed.

- 1.4 The updated policy that is being presented at this meeting has been created by the Policy & Risk Officer and referenced and reviewed by the HR & OD Manager and Deputy Town Clerk.
- 1.5 As part of this, officers looked at example policies from other councils as a guide. The ACAS website was also consulted as a fundamental guide to ensure the Town Council is compliant with the law surrounding Whistleblowing. Comments and feedback from previous Town Council meetings have all been fed back into this policy.
- 1.6 **Appendix A** represents the previously submitted policy and **Appendix B** presents the new draft policy for approval.
- 1.7 For reference, as part of the ongoing process of reviewing policies it is the intention that these will all now be presented in a new consistent format as per this draft policy. Feedback on this presentation is also welcomed.

2. Financial Appraisal

- 2.1 There are no direct financial implications as a result of this report.

3. Contact Officer

- 3.1 The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & RFO.



Whistleblowing Policy

Policy Ref.	XX
Date Last Adopted	TBC – March 2025
Date of Next Review	TBC – March 2030
Possible Prompts for Earlier Review	<ul style="list-style-type: none"> • Change in NALC model whistleblowing policy • Use of policy that prompts review and possible improvement
Previous Adoption Dates	n/a
Author	HR & Governance Manager

DRAFT VERSION NOTES – this is the draft Whistleblowing Policy that the National Association of Local Councils recommends all parish and town councils adopt. There are a number of changes tracked below to ensure the policy is relevant for Seaford Town Council.

WHISTLEBLOWING POLICY

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Policy

It is important that any fraud, misconduct or wrongdoing by [staff-employees](#) or others working on behalf of the Town Council is reported and properly dealt with. We therefore require all individuals to raise any concerns that they may have about the conduct of others in the Town Council.

This policy sets out the way in which [staff-employees](#) or others working on behalf of the Town Council may raise any concerns that they have and how those concerns will be dealt with.

Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters in the public interest. These are called "qualifying disclosures". A qualifying disclosure is one made by an employee who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. You have no responsibility for investigating the matter - it is the council's responsibility to ensure that an investigation takes place.

If you make a protected disclosure you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure. We encourage you to raise your concerns under this procedure in the first instance.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. [Staff-Employees](#) and others working on behalf of the Town Council should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No employee or other person working on behalf of the Town Council will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.

- Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure our disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the Town Clerk or the Mayor and Chair of Personnel.
- [You can raise a concern anonymously but be aware that the Town Council may not be able to take the claim further if it does not have all the information it needs. Alternatively, you can give your name but request confidentiality – the Town Council will then make every effort to protect your identity.](#)
- [If you wish to, you are able to raise your concerns directly with relevant prescribed bodies – there is more information on this under Stage 3 below. To be clear, if you feel that your concern is not appropriate for Stages 1 and 2 of the process below, you can go straight to raising this with the appropriate prescribed body, who will advise you on the process that will ensue.](#)

Procedure

If you believe a Councillor has breached the councillor Code of Conduct, then raise it with the Town Clerk or Mayor and Chair of Personnel. Concerns relating to an alleged breach of the councillor Code of Conduct will be referred to the Monitoring Officer for investigation by the Town Clerk or Mayor and Chair of Personnel on behalf of the whistleblower.

This procedure is for disclosures about matters other than a breach of your own contract of employment, which should be raised via the Grievance Procedure.

Stage 1

In the first instance, any concerns should be raised [with your line manager or the HR & OD Manager in accordance with the hierarchical table at Appendix A to this policy](#), who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained.

The investigating officer will take any necessary action, including reporting the matter to the Council, or any appropriate government department or regulatory agency. The investigating officer will also invoke any disciplinary action if required. On conclusion of any investigation, insofar as confidentiality allows, you will be told the outcome and what the council has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

Stage 2

[The hierarchical table at Appendix A gives two options for the reporting under Stage 1 of the process.](#) If you are concerned that [the you line manager or the HR & OD Manager both roles](#)

stated are-is involved in the wrongdoing, you should escalate the matter to the role/s identified in Stage 2 of the hierarchical table. Similarly, if you believe that the Stage 1 / Investigating person has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should also escalate the matter to the Town Clerk or Deputy Town Clerk role/s identified in Stage 2 of the hierarchical table. They will arrange for a review of the investigation to be carried out and make any necessary enquiries.

Stage 3

If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This includes:

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014: www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

Data protection

When an individual makes a disclosure, we will process any personal data collected in accordance with the data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

This is a non-contractual procedure which will be reviewed from time to time.

— policy ends here —

Notes

The wording of this policy is based on an employee's statutory right to make a disclosure in the public interest. Adopting and applying this policy as it stands will support the council to comply with this right.

Legal considerations:

An employee making a genuine disclosure under this policy is protected from victimisation and any unfavourable treatment. If a member of staff believes they have been treated differently because they have made a disclosure, they may be able make a claim to an Employment Tribunal irrespective of whether they are a casual, fixed term worker, or an established member of staff.

Important notice

This is an example of an employment policy designed for a small council adhering to statutory minimum requirements and does not constitute legal advice. As with all policies it should be consistent with your terms and conditions of employment.

This document was commissioned by the National Association of Local Councils (NALC) for the purpose of its member councils and county associations. Every effort has been made to ensure that the contents of this document are correct at time of publication. NALC cannot accept responsibility for errors, omissions and changes to information subsequent to publication. This document has been written by Worknest HR – a company that provides HR advice and guidance to town and parish councils.

APPENDIX 1 [ADDED FOLLOWING A REQUEST FROM THE FINANCE & GENERAL PURPOSES COMMITTEE]

Hierarchical Table – Whistleblowing Process

Depending on who the concern relates to, this table aims to clarify:

- who concerns should be raised with
- who may then be taking forward any subsequent investigation
- who the matter can be escalated to if you feel unhappy with the outcome or process

Concerns Relating To:	Stage 1 - Send To:	Stage 1 - Investigating Officer Options:	Stage 2 – Escalate to:
Town Clerk	Your line manager OR HR & OD Manager	Deputy Town Clerk (supported by Chair of Disciplinary & Grievance Panel)	Mayor & Chair of Personnel
Deputy Town Clerk	Your line manager OR HR & OD Manager	Town Clerk	Mayor & Chair of Personnel
Head of Place	Your line manager OR HR & OD Manager	Town Clerk	Mayor & Chair of Personnel
All others staff	Your line manager OR HR & OD Manager	HR & OD Manager	Town Clerk
Councillor	Town Clerk OR Mayor & Chair of Personnel	External – District Council's Monitoring Officer	n/a
A Council decision	Your line manager OR HR & OD Manager	Town Clerk OR Deputy Town Clerk OR Head of Place	Mayor & Chair of Personnel

This appendix and the table within are a live document and as such, this will be updated by officers as required e.g. where there are changes in job titles or role responsibilities. Where there are changes, this will be reissued to staff and uploaded to the Town Council's website.



WHISTLEBLOWING POLICY

This policy sets out the procedure to ensure that the Town Council deals with whistleblowing concerns in a fair, transparent and consistent manner

"Working with our community to secure Seaford's best future"

Policy Status

Version	0.2	Last Review Date	September 2025
Adopted Date	October 2025	Next Review Date	September 2026
Review Period	Annually	Approving Body	Full Council

Version History

Date	Version	Approval	Status
12.05.2025	0.1	Town Clerk	Policy draft
25.09.2025	0.2	Town Clerk	New policy

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1. Introduction

- 1.1. Seaford Town Council is committed to conducting all its business in an honest, fair, transparent, and consistent manner. The Council expects all its officers, councillors, contractors and volunteers to maintain high standards, ensuring integrity across all areas of the Council, and to act at all times in accordance with the Council's Whistleblowing Policy.
- 1.2. However, in common with all organisations and other councils, the Council is obligated to manage the risk of any misconduct, including, but not limited to fraud, unethical conduct, wrongdoing, or financial misconduct.
- 1.3. Officers, councillors, contractors or volunteers would often be the first to realise if there was something seriously wrong within the Council. However, they may be reluctant to voice their concerns, as they could worry about being perceived as untrustworthy colleagues. Furthermore, they may fear harassment or victimisation after reporting a concern within the Council. Under these circumstances, the risk of avoiding wrongdoing may arise, potentially leading to a delay in the necessary investigation for a suspected case of misconduct.
- 1.4. The Council is committed to the highest possible standards of openness, transparency, and accountability. In line with that commitment, we expect anyone who has serious concerns about any aspect of the Council's work to come forward and voice those concerns.
- 1.5. Therefore, to prevent misconduct and address it appropriately, the Council recognises that fostering a culture of openness and accountability is essential.
- 1.6. This policy document makes it clear that this can be done without any fear of victimisation, or discrimination. This Whistleblowing Policy is intended to encourage and enable anyone to raise serious concerns within the Council.
- 1.7. Hence, this policy is key to ensuring that any concerns raised about wrongdoing are addressed promptly and properly, and in a manner that fosters transparency and confidence in the Council's functioning.

2. Aim and Scope

- 2.1. The Whistleblowing Policy is primarily for concerns where the interests of the organisation or general public are at risk. This policy should be used if an incident arises that raises an ethical concern within the Council.
- 2.2. Therefore, the aim of the policy is to enable officers, councillors, contractors, and volunteers (hereafter 'Whistleblowers') to report

unethical misconduct that relates to an inappropriate or inadequate procedure, practice, or functioning within the Council.

2.3. This policy aims to:

- Encourage Whistleblowers to feel confident in raising serious concerns, questioning, and acting upon concerns about misconduct
- Provide avenues and flexibility for Whistleblowers to raise concerns and receive feedback on any actions taken.
- Ensure that all Whistleblowers receive a response to their concerns, where appropriate, and acknowledge that they have the right to ask for further information if the action taken is not satisfactory.
- Protect the confidentiality of a Whistleblower by ensuring they are protected from possible reprisals or victimisation if they have a reasonable belief that they have made a disclosure in good faith.

2.4. However, this policy shall not be used to deal with complaints or grievances which Whistleblowers may have about their employment and/or contractual terms.

3. Policy Application

- 3.1. This policy applies to all Council employees, regardless of whether they are full-time, part-time, temporary, or permanent officers. The policy applies to all volunteers and contractors, including their staff working for the Council (e.g., agencies, consultants, and providers of services and supplies).
- 3.2. Additionally, this policy applies to all councillors.

4. Defining Whistleblowing

- 4.1. Whistleblowing is the term used when a worker passes on information concerning wrongdoing. In this Policy, the Council calls that making a “disclosure” or raising a “concern.” The wrongdoing will typically (although not necessarily) be something Whistleblowers have witnessed or become aware of at work.
- 4.2. Furthermore, it refers to a disclosure made in good faith and in the public interest by one or more Whistleblowers regarding wrongdoing, illegal acts or omissions witnessed.
- 4.3. The Council acknowledges a Whistleblower is a witness rather than a complainant.
- 4.4. Whistleblowing is not the same as making a complaint or raising a concern about poor treatment that that has been personally

experienced. A Whistleblower is usually not directly or personally affected by the concern disclosed, although they may be indirectly.

4.5. This policy applies to concerns regarding any aspect of service provision or the conduct of anyone acting on behalf of the Council.

4.6. The above-mentioned concerns include but are not limited to the following:

- A criminal offence has been committed, is being committed or is likely to be committed.
- Failure to comply with any legal or regulatory requirements or professional obligations.
- Danger to the Council's standard operation (e.g., delays in projects or service provision)
- Financial fraud or mismanagement of the Council
- Breach of the Council's internal policies and procedures (e.g., disciplinary, health and safety policy).
- Any types of conduct likely to harm the Council's reputation and trust and/ or financial credibility.
- Unauthorised disclosure of confidential information that may result in a breach of the Council's classified information and/or data protection.
- Any deliberate damage to the environment (e.g., illegal dumping or dumping toxic waste that leads to water contamination).
- Deliberate concealment of information tends to show any of the matters mentioned above.

5. Whistleblowing Policy and Grievance Procedure

5.1. The Council takes into consideration the distinction between whistleblowing and grievance while conducting its investigation into any incident of disclosing a concern, to proceed with the most proper procedure and suitable steps to investigate.

5.2. The Council's Whistleblowing Policy is designed primarily for concerns where the interests of the Council are at risk.

5.3. The Whistleblowing Policy refers to a risk, unethical behaviour, or illegal activity that impacts others. It may involve situations that harm officers, volunteers, contractors, councillors, the Council as a whole, or the public. On the other hand, a grievance policy refers to an individual's complaint regarding their employment situation, such as workplace relationships or the application and interpretation of employment terms and conditions.

- 5.4. If a Whistleblower is uncertain about which policy applies to the intended concern, any uncertainty must be raised with the Council's HR & OD Manager for further clarification and consideration.

6. Legal Framework

- 6.1. The Council is committed to the Public Interest Disclosure Act (PIDA) 1998 ("The Act") and the Equality Act 2010, amended to provide protection for Whistleblowers to raise legitimate concerns regarding any misconduct within the Council, and to provide a guarantee against victimisation of Whistleblowers.
- 6.2. The Council acknowledges that a Whistleblower is not responsible for investigating the matter in any way. It is the Council's duty to investigate the concerns raised.
- 6.3. A Whistleblower will not be protected under the Act if the law is broken when making a disclosure.

7. Raising A Concern

- 7.1. The Council acknowledges that the Whistleblower raising a concern does not have to have firm evidence before doing so. Instead, the existence of a reasonable belief that wrongdoing is taking place is sufficient. Any evidence provided to the Council will be useful and would be considered in helping the Council investigate any concern reported, although it could be that the Whistleblower is not able to provide any evidence. Therefore, the Council reserves the right to request further information and explanation regarding the circumstances that gave rise to the concern as fully as possible.
- 7.2. An officer is typically expected to raise any concern(s) either verbally or in writing to the attention of the associated line manager. Contractors or volunteers should raise a concern in the first instance with their contact within the Council, usually the manager directly in charge. Afterwards, the manager will notify the designated Council's HR & OD Manager within three working days, whenever possible, to take the necessary action.
- 7.3. Any councillor/s wishing to raise a concern may do so by contacting the Town Clerk or Chair of Personnel Committee.
- 7.4. The line manager responsible and the designated HR & OD Manager must take all concerns seriously.
- 7.5. The Council will aim to respond to written concerns and acknowledge them within five working days of receipt. Furthermore, the Council will address the matter as soon as possible, keeping the Whistleblower informed of the progress throughout, as required. However, where a

detailed investigation is considered necessary then the Council may need an extended period to investigate the concerns. Where this is the case, it will be communicated.

- 7.6. The Council encourages putting names to the allegations to investigate and assess the situation as thoroughly as possible, because anonymous concerns are more difficult to investigate and impossible to provide feedback on.
- 7.7. Whilst the Council would strongly prefer any disclosure to be made directly to the Council, it is acknowledged that PIDA makes allowances for a concern to alternatively be made to a prescribed body (like the Information Commissioner's Office) or to a solicitor.
- 7.8. If the matter has been signposted by the Council to be addressed via an alternative mechanism, for example an external body (for example External Auditors/HMRC) then the Whistleblower will be informed of this, and progress will be shared with them in line with the rules of the external body, and not under the Council's Whistleblowing Policy.

8. Confidentiality

- 8.1. Any concerns investigated under the Council's Whistleblowing Policy will be examined comprehensively, swiftly, and with discretion.
- 8.2. The Council confirms that the disclosed concern will be addressed in accordance with the provisions outlined in the Act to avoid any harassment, victimisation or bullying of the Whistleblower.
- 8.3. No Whistleblower will be subject to changes to, or any detriment to their employment status, benefits, or work-related training due to raising a legitimate concern. Furthermore, any alleged victimisation of the Whistleblower will be investigated as a potential disciplinary offence in line with the Council's disciplinary policy.
- 8.4. However, the Whistleblower will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence.

9. Investigation of the Raised Concern

- 9.1. The concern will be investigated, and as part of Council's investigation process, the Whistleblower will be interviewed and requested to submit a written statement detailing the nature and specifics of their report along with the rationale behind it.
- 9.2. This investigation may involve a formal review of internal processes or a more formal investigation.

- 9.3. The HR & OD Manager will contact the Whistleblower and remain the point of contact throughout the process. In their absence, the Deputy Town Clerk will manage the initial investigation.
- 9.4. The Whistleblower will not be penalised for raising a disclosure even if it is not upheld, unless the complaint was known to be untrue and/or made with malicious intent.
- 9.5. The Council may, in certain circumstances, need to appoint an external investigator with relevant knowledge and understanding to complete the investigation process. The investigator (or investigators) may make recommendations for changes to minimise the risk of future wrongdoing. Therefore, the appointed investigators will undergo a thorough investigation, with possible outcomes being one or more of the following:
- Referral to the police,
 - Referral to an external auditor,
 - Referral to a disciplinary process, or,
 - No action to be taken depending on the outcome of the full investigation.
- 9.6. The Council may not be able to disclose specific actions taken during the investigation to ensure that it does not violate its obligations to maintain confidentiality regarding other individuals during the implementation of any internal procedure.
- 9.7. Below is the hierarchical table for the whistleblowing process.

Concerns Relating To:	Stage 1 – Send To:	Stage 1 - Investigating Officer Options:	Stage 2 – Escalate To:
Town Clerk	Your line manager OR HR & OD Manager	Deputy Town Clerk (supported by Chair of Disciplinary & Grievance Panel)	Chair of CCMG & Chair of Personnel
Deputy Town Clerk	Your line manager OR HR & OD Manager	Town Clerk	Chair of CCMG & Chair of Personnel
Head of Place	Your line manager OR HR & OD Manager	Town Clerk	Chair of CCMG & Chair of Personnel

Concerns Relating To:	Stage 1 – Send To:	Stage 1 - Investigating Officer Options:	Stage 2 – Escalate To:
All others staff	Your line manager OR HR & OD Manager	HR & OD Manager	Town Clerk
Councillor	Town Clerk OR Chair of CCMG & Chair of Personnel	External – District Council's Monitoring Officer	n/a
A Council decision	Your line manager OR HR & OD Manager	Town Clerk OR Deputy Town Clerk OR Head of Place	External – District Council's Monitoring Officer

10. Recording and Monitoring of Whistleblowing Complaints

- 10.1. All incoming concerns will be registered, documented, and stored in accordance with the Council's policies.
- 10.2. The HR & OD Manager will maintain a safe record of concerns raised and the outcome of the investigation.
- 10.3. If ever unsure about the contents or any part of this policy, then the Whistleblower should speak to their line manager or the HR & OD Manager.