

# NOTICE OF MEETING



*Eryri National Park Authority*

*Jonathan Cawley*

*Chief Executive*

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*Penrhyndeudraeth*

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**Meeting:** Standards Committee

**Date:** Friday 27 March 2026

**Time:** 2.00 p.m.

**Location:** Eryri National Park Authority Office,  
Penrhyndeudraeth and via Zoom

***Members are asked to join the meeting 15 minutes before the designated start time***

**Councillors :**

*Elfed Roberts, Nia Owen;*

*Naomi Luhde-Thompson.*

**Independent Members**

*Mr. Mark Jones, Mr Robert Gwilym Lewis.*

*\*This Agenda is also available in Welsh*



## **A G E N D A**

### **Standards Committee**

		Page Number
1.	<b>Apologies for absence and Chairman's Announcements</b>	
2.	<b>Declarations of Interest</b> To receive any disclosure of interest by members or officers in respect of any item of business.	
3.	<b>Minutes</b> The Chairman shall propose that the minutes of the Standards Committee held on 19 September 2025 be signed as a true record (copy herewith) and receive matters arising, for information.	3 - 6
4.	<b>Annual Report to the Authority's Annual General Meeting</b> To submit a report by the Director of Corporate Services (Copy herewith)	7 - 9
5.	<b>Declarations of Members' Interests</b> To submit a report by the Director of Corporate Services (Copy herewith)	10 - 12
6.	<b>Anti-fraud, Bribery and Corruption Policy</b> To submit a report by the Head of Administration and Customer Care (Copy herewith)	13 - 22
7.	<b>Confidential Reporting Policy (Whistleblowing)</b> To submit a report by the Head of Administration and Customer Care (Copy herewith)	23 - 29
8.	<b>National Standards Forum Committee – Monday 26 January 2026</b> To receive minutes of the meeting, for information.	



**MINUTES**  
**STANDARDS COMMITTEE**  
FRIDAY 19 SEPTEMBER 2025  
National Park Office

**PRESENT:**

**Members appointed by Gwynedd Council**

**Members appointed by Conwy County Borough Council**  
Councillor Nia Owen;

**Members appointed by the Welsh Government**  
Ms Naomi Luhde-Thompson

**Independent Members**  
Mr Mark Jones, Mr Robert Gwilym Lewis;

**Officers**  
Iwan Jones, Bethan Hughes, Eifion Jones.

The Director of Corporate Services announced that the meeting would be recorded to assist with checking the minutes.

Mr Robert Gwilym Lewis was welcomed to his first meeting of the Standards Committee.

**1. Election of Chairman and Vice-chairman**

The Director of Corporate Services explained that a Chairman had to be elected for the Standards Committee following the retirement of the former chairman, Mr Martin J Hughes, after he had completed his second term as an Independent Member.

Mark Jones was nominated and **elected** as Chairman.

*It was explained* that, as the Vice-chairman had been appointed Chair of the Committee, it was necessary to elect a Vice-chairman.

Mr Robert Gwilym Lewis was nominated and **elected** as Vice-chairman.

The Director of Corporate Services said that the Committee was still short of one independent member, and that the position had already been advertised.

**2. Apologies for absence and Chairman's Statements**

*Noted:* since the Committee lacked one Independent Member, Councillor Elfed Roberts had withdrawn from attending the meeting to ensure the necessary balance of members.

The Chairman also apologised that he would have to leave the meeting early.

*Noted* - there would not be a quorum when the Chairman left and, because of this, it was decided to change the order of the meeting and address the most important items first.

3. **Declaration of Interest**

Councillor Nia Owen declared a personal interest in item 7 only, because she was a member of Conwy Borough Council.

4. **Minutes**

The minutes of the Standards Committee meeting held on 11 April 2025 were *presented and adopted*, and the Chairman signed them as a true record.

Matters arising from the minutes:

- It was agreed that a letter of thanks should be sent to Mr Martin Hughes on his retirement from the Standards Committee.

5. **To Nominate Members for the Single Status Grading Appeals Panel**

*Submitted:* A report by the Director of Corporate Services to appoint three Members and two deputy members to the Single Status Scale Appeals Panel.

*Reported:*

- that the Standards Committee must consider the membership of the Single Status Grading Appeals Panel annually following the Authority's AGM;
- that the terms of reference also provided that, when appointing members on the Panel, the Standards Committee would consider the need for appropriate representation in terms of gender;
- for the Committee, on 20 September 2024, to appoint Mr Martin J. Hughes, Mr Mark Jones, and Councillor Elfed Roberts as Members of the Single Status Grading Appeals Panel and to appoint Councillor Nia Owen and Ms Naomi Luhde-Thompson as alternate / proxy members.

*Recommended:*— To appoint three members and two reserve members / alternates from the membership of the Standards Committee to sit as members of the Single Status Grading Appeals Panel.

*Resolved:*— to appoint Mr Mark Jones, and Councilors Elfed Roberts and Nia Owen as Members of the Single Status Grading Appeals Panel and to appoint Ms Naomi Luhde-Thompson and Mr Robert Gwilym Lewis as alternate / substitute members.

7. **Permit Dispenstions**

*Submitted:* A report by the Director of Corporate Services recommending that the Standards Committee grant general discharge to Members of Gwynedd Council and Conwy County Borough Council.

*Noted:*

- the Standards Committee, at the meeting of 20 September 2024, resolved to grant dispensations for Members appointed by Gwynedd Council and to Members appointed by Conwy County Borough Council to enable them to participate fully in deciding on the affairs of their own councils for a period up to 31st December 2025 unless the period was extended by the Standards Committee before 31 December 2025;
- this period would end before the Standards Committee next meets and that it is time to consider the matter further;
- granting dispensations prevented quorum problems from arising in meetings relating to the affairs of Gwynedd and Conwy councils;

- the procedure had worked well in the past but it was important to review it regularly;
- it had been used once during the previous 12 months where Members of Conwy County Borough Council used a general dispensation granted to them by the Standards Committee at the meeting of 20 September 2024 to participate in the discussions and the decision. The Independent Members were not informed before the meeting that the members would be using the dispensation but a recording of the meeting was sent to the Independent Members.

*Recommended:—*

1. To grant dispensation to Members appointed by Gwynedd Council to enable them to participate fully in the process of deciding matters relating to Gwynedd Council for a period up to 31st December 2026 unless it is extended further by a decision of this Committee before 31st December 2026.
2. To grant dispensation to Members appointed by Conwy County Borough Council to enable them to participate fully in the process of deciding matters relating to Conwy County Borough Council for a period up to 31st December 2026 unless it is extended further by a decision of this Committee before 31st December 2026.

*Resolved: — to **accept** the Recommendation*

## 6. **Public Services Ombudsman for Wales**

*Submitted:* A report by the Director of Corporate Services.

*Reported:*

- that the Ombudsman received one complaint relating to the National Parks of Wales during 2024-25, but it did not relate to Eryri National Park.

*Noted:*

- that Park Members did not receive specific training on the Code of Conduct, but that any member was invited to raise any issue with the Director of Corporate Services

*Proposed:*

- information about the case that came before the Ombudsman should be sent to the Members, and the opportunity would be utilised to offer them further training.

*Recommended:—*

1. to note the content of the Report;
2. to send information about the case that came before the Ombudsman to Members of the Authority, and offer them further training on the Code of Conduct.

*Resolved: — to **accept** the Recommendation*

## 8. **Complaints Monitoring Report**

*Submitted –* A report by the Head of Administration and Customer Care on written complaints received by the Authority in 2024/25.

*Reported:*

- the number and nature of formal complaints received together with the responses given;
- that three complaints received related to breaches of the Data Protection Act, and that this is something to keep an eye on to see if staff would need further training.

*Noted:*

- that it was nice to see that only a small number of complaints were received, and that each one was fully investigated and responded to within the appropriate time limits.

*Recommended:* – to note the content of the Report.

*Resolved:* — to **accept** the Recommendation

9. **Standard Committee Chairs' Forum Monday 23 June 2025**

*Submitted* – Minutes of the Standards Committee Chairs' Forum meeting held on 23 June 2025.

*Reported:*

- that Mr Martin Hughes, former chairman of the Standards Committee attended the meeting, but that the Director of Corporate Services failed to attend, and that the minutes were presented as is, for information;

*Noted:*

- a note should be sent to the Chairs' Forum informing them about the appointment of Mr Mark Jones as the new Chair of the Standards Committee and asking them to invite him to their meetings from now on.

*Recommended:* – to note the minutes for information.

*Resolved:* — to **accept** the Recommendation

**The meeting ended at 14:45**



<b>MEETING</b>	Standards Committee
<b>DATE</b>	27 March 2026
<b>TITLE</b>	<b>Annual Report to the Authority's Annual General Meeting</b>
<b>REPORT BY</b>	Director of Corporate Services
<b>PURPOSE</b>	To agree the contents of the Annual Report

## BACKGROUND

1. From May 2022 the remit of the Standards Committee has included an additional statutory duty to prepare an annual report to the Authority on how the committee's functions have been discharged and provide an overview of conduct matters generally within the Authority.
2. Previously, it was agreed that the Independent Chair of the Standards Committee in consultation with the Director of Corporate Services would prepare this report, but discuss the proposed content with the Standards Committee before submitting the finalised report to the Authority, with the Chair of the Standards Committee to present the report to the Authority at the Annual General Meeting of the Authority.

## STATUTORY DUTY AND DRAFT GUIDANCE

3. Guidance has been prepared on the subject which reads as follows:
  - 3.1. *"Section 63 of the 2021 Act inserts a new section 56B into the 2000 Act which places a requirement on standards committees in each "relevant authority" to make an annual report to the authority concerned. In the case of a principal council, the requirement to report to "the authority" in this context includes any community councils in its area.*
  - 3.2. *As a minimum, the report must:*
    - 3.2.1. *describe how the committee has discharged its functions during the preceding financial year;*
    - 3.2.2. *include a summary of reports and recommendations made or referred to the committee by the Public Services Ombudsman for Wales relating to the investigation of alleged breaches of the member code of conduct, and any subsequent action taken by the committee;*
    - 3.2.3. *include a summary of notices given to the committee by the Adjudication Panel for Wales, relating to the Panel's decisions on possible breaches of the member code of conduct;*
    - 3.2.4. *describe the advice it has provided on training for all members and how that has been implemented, and*

- 3.2.5. *in the case of a principal council, include the committee's assessment of how political group leaders have complied with the new duty under section 52A(1) of the 2000 Act (inserted by section 62 of the 2021 Act) to promote high standards of conduct, including the advice the standards committee has provided and the training it has suggested.*
- 3.3. *The committee may also wish to report on the number of cases considered under local resolution processes. This would help to capture data on an "all Wales" basis, on matters which do not reach the Public Services Ombudsman for Wales.*
- 3.4. *The requirement to make an annual report is intended to ensure there is a regular and consistent approach to the reporting and consideration of standards of conduct by members of relevant authorities in Wales. This is intended to promote local ownership and collective responsibility by members for ensuring high standards of conduct within their authority. To this end, section 56B places an obligation on a relevant authority to consider the report and any recommendations made by its standards committee within three months of its receipt. The authority's consideration of a report will be a matter of public record through the published minutes of the meeting.*
- 3.5. *It would be good practice for Standards Committees to share their Annual Reports with the Public Services Ombudsman for Wales."*

## **ANNUAL REPORT**

- 4. If one considers the draft guidance and the matters that must be reported it is proposed to report as follows:
  - 4.1. That the committee has met twice during the year, considered member training on both occasions.
  - 4.2. That there have been no matters referred to the Public Services Ombudsman or to the Adjudication Panel for Wales relating to the investigation of alleged breaches of the member code of conduct as members of this Authority.
  - 4.3. That there have been no instances during the year where the Authority's Local Resolution procedure has been invoked.
  - 4.4. The Standards Committee considered the contents of the Annual Report published by the Public Services Ombudsman for Wales. Arising thereon the Standards Committee considered that information should be sent to members on a particular matter that had arisen in another Authority to raise awareness and to inform members that further training on the issues raised were available on request. An e-mail was subsequently circulated to all Authority members.
  - 4.5. The Standards Committee also considered a Complaints Monitoring Report that gave an insight into the nature of complaints received and whether there were any established patterns emerging.
  - 4.6. The Standards Committee granted dispensations to Gwynedd Council members and Conwy County Borough Council members allowing them to take part in the determination of issues in certain limited circumstances.
  - 4.7. The Standards Committee also considered a report monitoring declarations of interests made by members as part of its remit in monitoring the operation of the code of conduct.
  - 4.8. The Standards Committee considered two updated draft policies and were given the opportunity to suggest amendments thereto prior to being adopted by the

Authority namely the Anti-Fraud Bribery and Corruption Policy and the Whistleblowing Policy.

### **RESOURCE IMPLICATIONS**

None

### **RECOMMENDATION**

1. To discuss the contents of the report.
2. To agree the contents of the Annual Report to be presented to the Authority as set out in Section 4 above subject to any additions/amendments that the Standards Committee may wish to make thereto.



<b>MEETING</b>	Standards Committee
<b>DATE</b>	27 March 2026
<b>TITLE</b>	<b>Declaration of Members' Interests</b>
<b>REPORT BY</b>	Director of Corporate Services
<b>PURPOSE</b>	To monitor the operation of the code of conduct

**BACKGROUND**

On the 3<sup>rd</sup> September 2021 the Standards Committee considered a report on The Ethical Framework and Revised Guidance issued by the Public Services Ombudsman for Wales on the Code of Conduct. As part of the actions Members expressed a desire for the Standards Committee to monitor the operation of the code of conduct and arising thereon, officers agreed to provide details of Members' declarations of interests to the Standards Committee annually.

Attached (Appendix 1) are copies of the Member Declaration of Interest forms from 1<sup>st</sup> April 2025 to 28<sup>th</sup> February 2026.

Also, please follow the link to view the General Register of Members' Interests on the Authority's website.

[Publications - Park Authority \(gov.wales\)](#)

**RECOMMENDATION:**

To note the report, for information.



# Awdurdod Parc Cenedlaethol Eryri Eryri National Park Authority

## FFURFLEN DATGAN DIDDORDEB DECLARATION OF INTEREST FORM

Cyfarfod / Meeting ..... *Gwrithgor Aelodau* .....

Dyddiad y Cyfarfod / Date of Meeting ..... *21/5/25* .....

Rwyf drwy hyn yn datgan bod gennyf Diddordeb Personol yn yr eitem ganlynol /  
I hereby declare that I have a Personal Interest in the following item:-

Pennawd yr eitem / Title of item:- .....

Eitem Rhif/Item No.....

Disgrifiwch natur y Diddordeb Personol/Describe nature of the Personal Interest:-

*~~Ymddiriedolaeth~~ Ymddiriedolaeth i elusen Plantlife International  
yn y parnes yn cynnalun Coeb Glaw Eryri*

A yw'r diddordeb personol gyfystyr â diddordeb sy'n rhagfarnu? Ydi / Yes  
Does the Personal Interest constitute a prejudicial interest?

Nac ydi / No

Arwyddwyd/Signed: .....

Dyddiad/Date: ..... *11/6/25* .....



# Awdurdod Parc Cenedlaethol Eryri Eryri National Park Authority

## FFURFLEN DATGAN DIDDORDEB DECLARATION OF INTEREST FORM

Cyfarfod / Meeting ..... *Cyflwrnis* ..... ~~21/1/26~~ .....

Dyddiad y Cyfarfod / Date of Meeting ..... *21/1/26* .....

Rwyf drwy hyn yn datgan bod gennyf Diddordeb Personol yn yr eitem ganlynol /  
I hereby declare that I have a Personal Interest in the following item:-

Pennawd yr eitem / Title of item:- ..... *Sgillan HEP Cwmant Cyfod* .....

Eitem Rhif/Item No ..... *NPS/59/495C* .....

Disgrifiwch natur y Diddordeb Personol/Describe nature of the Personal Interest:-  
*Dwi yn aelod ymddwoldwr i elyren Plantife a mae nhw wedi mynychu uchwybiad i adar yma*  
*Dwi ddim wedi gwneud unrhyw beth fel unigolyn yn yr adar yma*

A yw'r diddordeb personol gyfystyr â diddordeb sy'n rhagfarnu? Ydi / Yes

Does the Personal Interest constitute a prejudicial interest?

Nac ydi / No

Arwyddwyd/Signed: ..... *[Signature]* .....

Dyddiad/Date: ..... *21/1/26* .....

<b>MEETING</b>	Standards Committee
<b>DATE</b>	27 March 2026
<b>TITLE</b>	<b>Anti-Fraud, Bribery and Corruption Policy</b>
<b>REPORT BY</b>	Head of Administration and Customer Care
<b>PURPOSE</b>	To review and update current policy

**1. BACKGROUND / INTRODUCTION**

- 1.1. The Authority has adopted a suite of policies and procedures for maintaining high standards of conduct for both staff and Members, and to ensure accountability to the public.
- 1.2 Following the Authority's Assurance and Risk Assessment by Audit Wales last year, one of the findings was that the Authority lacks a consistent, timed approach to reviewing its corporate policies and governance documents, which then reduces the reliance the Authority can have that its policies and governance documents are up to date.
- 1.3 In response to this finding, a Register of Corporate Policies was produced with a schedule of review dates assigned to each policy.
- 1.3 The Anti-Fraud, Bribery and Corruption Policy is the first of such policies to be reviewed.
- 1.4 Since the initial adoption of this policy there have been no significant changes to legislation which would require fundamental changes to the policy, as The Fraud Act 2006 is still considered to be a robust and flexible piece of legislation.
- 1.5 However, significant new legislation that supplements the Act, specifically the new 'failure to prevent fraud' offence under the Economic Crime and Corporate Transparency Act 2023 came into effect on the 1<sup>st</sup> of September 2025.
- 1.6 Although the Authority does not fall under the definition of 'large body' as defined in the Act and is therefore not subject to the requirement to have a Fraud Prevention Framework; we can however incorporate the six principles required in such a framework as best practice (see 9.2 in the policy).

**RECOMMENDATION:**

- 2.1 To discuss and review the draft updated policy appended.
- 2.2 To approve the revised draft Anti-Fraud, Bribery and Corruption Policy for submission to the National Park Authority for adoption.

**ERYRI NATIONAL PARK AUTHORITY**  
**ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY**



## **1.0 PURPOSE**

1.1 The purpose of this document is to explain what the Authority will do in order to minimise the risk of fraud, bribery and corruption, to investigate suspicions, and the steps that will be taken in response.

This document:

- Provides a definition of fraud, bribery and corruption;
- Sets out the standards that the Authority expects from its Members and employees;
- Sets out the steps that actively encourages fraud prevention and deterrence; and
- Sets out how the Authority will investigate fraud, bribery and corruption.

## **2.0 INTRODUCTION**

2.1 This policy covers all employees and Members of the Authority. This document replaces the previous Anti-Fraud and Corruption Strategy and incorporates updates to legislation and good practice in this field.

2.2 In carrying out its functions and responsibilities, the Authority has always adopted a culture of openness and fairness and has expected that its Members and employees at all levels will adopt the highest standards of propriety and accountability. This has been achieved by leading by example and by an understanding of and adherence to rules, procedures and agreed practices. These standards have also been expected from organisations that have dealings with the Authority (e.g. suppliers/contractors).

2.3 We are in a strong position due to the controls that are already in place, e.g. standing orders, financial regulations and the Members' code of conduct, but we must not be complacent.

2.4 The Authority therefore must demonstrate clearly that it is firmly committed to dealing with fraud, bribery and corruption and will deal equally with perpetrators from inside (Members and employees) and outside the Authority. In addition, there will be no distinction made in investigation and action between cases that generate financial benefits and those that do not.

- 2.5 This policy however, will not compromise the Authority's equal opportunities policy or any obligations as an employer under the code of conduct for local government employees.
- 2.6 This policy document embodies a series of measures designed to frustrate any attempted fraudulent or corrupt act and the steps to be taken if such an act occurs.
- 2.7 The Authority also acknowledges the high degree of external scrutiny of its affairs by a variety of bodies such as Audit Wales, Public Services Ombudsman for Wales, HM Customs and Excise and Welsh Government. These bodies are important in highlighting any areas where improvements can be made.

### **3.0 DEFINITIONS**

3.1 Fraud, bribery and corruption are often intertwined. They are deliberate acts by individuals or group of individuals that are intentional and dishonest. Some acts will fall under the definition of more than one category.

#### **3.2 Fraud**

3.3 The Fraud Act of 2006 gives us a legislative definition of fraud, which for the purposes of this policy, can be summarised as obtaining money, property or services dishonestly by making false or misleading representation, failing to disclose information, or abusing a position of trust.

3.4 Fraud is also a deliberate act by an individual or group of individuals. Fraud is therefore, always intentional and dishonest.

3.5 Some examples are:

- False or exaggerated travel and expenses claims;
- Recording incorrect working hours on the flexible working scheme;
- Invoices presented for services not received;
- Failure to disclose a relevant or unspent criminal conviction on an application for a job; and
- Contractors failing to disclose Health and Safety prosecutions on tender documents.

#### **3.4 Bribery and Corruption**

3.5 Bribery can be defined as the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person. Corruption is the abuse of entrusted power for private gain.

3.7 Some examples are:

- The acceptance of a gift in exchange for providing favourable treatment in the tender procurement process;
- Providing favourable treatment in the tender procurement process to enable the awarding of contracts to friends and / or family members; and
- The acceptance of a gift in exchange for ignoring breaches of legislation;

#### **4.0 CULTURE**

- 4.1 The culture of the Authority has always been one of openness and the core values of fairness, trust and value support this. The Authority's culture therefore supports the opposition to fraud, bribery and corruption.
- 4.2 The prevention/detection of fraud/bribery/corruption and the protection of the public purse are everyone's responsibility.
- 4.3 The Authority's Members and employees play an important role in creating and maintaining this culture. They are positively encouraged to raise concerns regarding fraud, bribery and corruption, immaterial of seniority, rank or status, in the knowledge that such concerns will, wherever possible, be treated in confidence.
- 4.4 Concerns must be raised when Members or employees reasonably believe that one or more of the following has occurred, is in the process of occurring or is likely to occur:
- a criminal offence;
  - a failure to comply with a statutory or legal obligation;
  - improper use of public or other funds;
  - a miscarriage of justice;
  - maladministration, misconduct or malpractice;
  - endangering of an individual's health and safety;
  - damage to the environment; or
  - deliberate concealment of any of the above.
- 4.5 The Authority will ensure that any allegations received in any way, including by anonymous letters or phone calls, will be taken seriously and investigated in an appropriate manner, subject to the principles of natural justice and the provisions of the Human Rights Act 1998.
- 4.7 The Authority will deal firmly with those who defraud the Authority, or who are corrupt, or where there has been financial malpractice. There is, of course, a need to ensure that any investigation process is not misused and, therefore, any abuse (such as employees raising malicious allegations) may be dealt with as a disciplinary matter.
- 4.8 When fraud, bribery and/or corruption have occurred because of a breakdown in the Authority's systems or procedures, the relevant Director or Directors will ensure that appropriate improvements in systems of control are implemented to prevent a reoccurrence.

#### **5.0 PREVENTION**

##### **MEMBERS**

##### **5.1 The Role of Members**

- 5.2 All Members of the Authority have a duty to protect the Authority from all forms of abuse.
- 5.3 This is done through the anti-fraud, bribery and corruption policy and compliance with the Code of Conduct for Members, the Authority's financial regulations and standing orders and the relevant legislation.
- 5.4 Members sign to the effect that they have read and understood the Code of Conduct when they take office. These conduct and ethical matters are specifically brought to the attention of Members during induction and include the declaration and registration

of interests. The Monitoring Officer advises Members of new legislative or procedural requirements.

## **EMPLOYEES**

### **5.6 The Role of Managers**

- 5.7 Managers at all levels are responsible for the communication and implementation of this policy in their work area. They are also responsible for ensuring that the employees are aware of the Authority's financial regulations and standing orders, and that the requirements of each are being met in their everyday business activities. In addition, managers must make their employees aware of the requirements of the National Code of Conduct for Local Government Employees through the induction process.
- 5.8 Managers are expected to strive to create an environment in which their staff feel able to approach them with any concerns they may have about suspected irregularities. Where they are unsure of the procedures, they must refer to the information in the Authority's Confidential Reporting Policy ("Whistle Blowing").
- 5.9 Special arrangements will apply where employees are responsible for cash handling or are in charge of financial systems and systems that generate payments, for example payroll. Managers must ensure that relevant training is provided for employees. Checks must be carried out at least annually to ensure that proper procedures are being followed.
- 5.10 The Authority recognises that a key preventative measure in dealing with fraud, bribery and corruption is to take effective steps at the recruitment stage to establish, as far as possible, the honesty and integrity of potential employees, whether for permanent, temporary or casual posts. The Authority's equal opportunities policy will be adhered to during this process.
- 5.11 The Authority has a formal recruitment procedure, which contains appropriate safeguards on matters such as written references and verifying qualifications held. As with other public bodies, checks are undertaken with the Disclosure and Barring Service (DBS) on employees working with children and vulnerable adults. Further checks will be introduced in areas where an increased risk of potential fraud and corruption has been identified.
- 5.12 In addition, Managers create and maintain their service specific risk register. As part of this, Managers are expected to carry out due diligence through a periodic, proportionate and risk based documented assessment of the nature and extent of potential external and internal risks of fraud, bribery and corruption.

### **5.13 Responsibilities of Employees**

- 5.14 Each employee is governed in their work by the Authority's standing orders and financial regulations and other codes of conduct and policies (Health and Safety, IT policies, IT security). They are also governed by the Code of Conduct for Local Government Employees. Included in these are the Code of Practice on Receipt of Gifts and Hospitality. These are issued to all employees when they join the Authority or will be provided by their manager.
- 5.15 In addition to paragraph 5.14, employees are responsible for ensuring that they follow the instructions given to them by management, particularly in relation to the safekeeping of the assets of the Authority.
- 5.16 Employees are always expected to be aware of the possibility that fraud, bribery, corruption or theft may exist in the workplace and be able to share their concerns with management. If for any reason, they feel unable to speak to their manager they must refer the matter to one of those named below.

5.17 Concerns must be raised, in the first instance, directly with the Heads of Service, Head of Finance, the relevant Director, Chief Executive or Monitoring Officer, if necessary, anonymously (by letter or phone), who will respond to such concerns in accordance with the procedures established in Annex 1.

#### **5.18 Conflicts of Interest**

5.19 Both Members and employees must ensure that they avoid situations where there is a potential for a conflict of interest. Such situations can arise with externalisation of services, internal tendering, planning and land issues, etc. Effective role separation will ensure decisions made are seen to be based upon impartial advice and avoid questions about improper disclosure of confidential information.

#### **5.20 Role of Internal Audit**

5.21 Internal Audit Services plays a vital preventative role in trying to ensure that systems and procedures are in place to prevent and detect fraud, bribery and corruption. Audit Services investigate all cases of suspected irregularity, in accordance with the requirements of the Human Rights Act 1998. They liaise with management to recommend changes in procedures to prevent further losses to the Authority.

#### **5.22 The Role of External Audit**

5.23 Independent external audit carried out by Audit Wales is an essential safeguard in the stewardship of public money. This role is delivered through the carrying out of specific reviews that are designed to test (amongst other things) the adequacy of the Authority's financial systems, and arrangements for preventing and detecting fraud, bribery and corruption. It is not the external auditor's function to prevent fraud and irregularity, but the integrity of public funds is at all times a matter of general concern. External auditors are always alert to the possibility of fraud and irregularity and will act without undue delay if grounds for suspicion come to their notice. The external auditor has a responsibility to review the authority's arrangements to prevent and detect fraud and irregularity, and arrangements designed to limit the opportunity for corrupt practices.

#### **5.24 Co-operation with Others**

5.25 Internal Audit has arranged and will keep under review procedures and arrangements to develop and encourage the exchange of information on national and local fraud and corruption activity in relation to local authorities with external agencies such as:

- The Police
- Unitary Authorities
- Public Services Ombudsman for Wales
- Audit Wales
- Government departments.

### **6.0 DETERRENCE**

#### **6.1 Disciplinary Action**

6.2 Theft, fraud, bribery and corruption are serious offences against the Authority and employees will face disciplinary action if there is evidence that they have been involved in these activities. Disciplinary action will be taken in addition to, or instead of, criminal proceedings, depending on the circumstances of each individual case.

6.3 Members will face appropriate action under this policy if they are found to have been involved in theft, fraud, bribery or corruption against the Authority. Action will be taken in addition to, or instead of, criminal proceedings, depending on the circumstances of each individual case, but in a consistent manner. Where the activities involve breaches of the Code of Conduct for Members the matter will be referred to the Public Services Ombudsman for Wales.

## 7.0 DETECTION AND INVESTIGATION

7.1 Internal Audit plays an important role in the detection of fraud and corruption by conducting reviews of system financial controls and specific fraud and corruption tests, spot checks and unannounced visits.

7.2 In addition to Internal Audit, there are numerous systems controls in place to deter fraud and corruption, but it is often the vigilance of employees and members of the public that aids detection.

7.3 In some cases frauds are discovered by chance or 'tip-off' and arrangements are in place to enable such information to be properly dealt with, in accordance with the requirements of the Human Rights Act 1998.

7.4 The Authority has adopted a Confidential Reporting Policy ("Whistle Blowing") which informs and assures staff about the disclosure of suspected misconduct and how the Authority will respond.

7.5 All suspected irregularities are required to be reported (verbally or in writing) either by the person with whom the initial concern was raised or by the originator, as per paragraph 7.4 (the authority's confidential reporting policy). This is essential to the policy, and:

- ensures the consistent treatment of information regarding fraud, bribery and corruption; and
- facilitates a proper and thorough investigation by an experienced audit team, in accordance with the requirements of the Human Rights Act 1998.

7.6 The process by which the investigation will be initiated is set out in Annex 1

7.7 This process will apply to all the following areas:

- a) fraud, bribery and corruption by Members
- b) internal fraud, bribery and corruption
- c) other fraud, bribery and corruption by authority employees
- d) fraud by contractors' employees
- e) external fraud (the public).

7.8 Cases under a), d) and e) would normally be referred directly to Audit Wales, Public Service Ombudsman for Wales or the Police for investigation.

## 8.0 AWARENESS AND TRAINING

8.1 The Authority recognises that the continuing success of this policy and its general credibility will depend in part on the effectiveness of programmed training and an awareness of Members and employees throughout the Authority.

8.2 To facilitate this, positive and appropriate provision has been made via induction and for employees via their development plans. This may include specialist training for certain Members and employees.

8.3 Information on the Confidential Reporting Policy was distributed to all employees and Members, and full copies of this policy are available to staff through the Intranet (Sharepoint).

## 9.0 CONCLUSION

9.1 The Authority has always prided itself on setting and maintaining high standards and a culture of openness, with core values of fairness, trust and value. This policy fully supports the Authority's desire to maintain an honest Authority, free from fraud, bribery and corruption.

9.2 This policy follows best practice by incorporating the following six principles which are the cornerstone of any fraud, bribery and corruption prevention policy, namely:

- top level commitment;
- risk assessment;
- proportionate risk-based prevention procedures;
- due diligence;
- communication (including training); and
- monitoring and review.

9.3 The Authority has in place a network of systems and procedures to assist it in dealing with fraud, bribery and corruption when it occurs. It is determined that these arrangements will keep pace with any future developments in technology to both prevent and detect fraudulent or corrupt activity that may affect its operation.

9.4 The Authority will maintain a continuous review of all these systems and procedures through Audit Services.

9.5 This policy will be reviewed every five years unless the Monitoring Officer is of the opinion that internal or external changes affecting the Authority make it advisable to review the policy at an earlier date.

Updated policy adopted:	
Revision date:	

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## **ANNEX 1**

### **INVESTIGATING ALLEGATIONS OF FINANCIAL MISCONDUCT**

1. Officers or post holders who have specific roles in the implementation of this policy but are implicated in the allegation will not be involved in the decisions relating to the allegation. They will not be informed or consulted in respect of the allegation by virtue of their office.
2. On receipt of a complaint from a member of staff, the Head of Finance will meet the individual who raised the matter to establish the basis of concern. The Chief Executive, Chief Finance Officer, Monitoring Officer and Internal Auditors will be informed. Until the facts have been established, discretion will be observed by all involved.
3. After establishing the basis of concern, the Chief Finance Officer will review the allegations and establish the apparent position. The decision on whether a formal investigation should be undertaken will be agreed with the Chief Executive and Monitoring Officer. If the allegation pertains to the Chief Executive, the decision will then be taken with the Chair. If the allegation pertains to the Monitoring Officer, the decision will then be taken with the Authority's Solicitor.
4. If the concern has been made in writing, then the informant will be informed in writing of the Authority's response in accordance with the Confidential Reporting Policy.
5. If a basis for concern is established then the matter will be referred to the Internal Auditors for investigation or, having regard to clause 7.8 of this Policy, Audit Wales or the Police.
6. If the allegation involves breaches of the Code of Conduct for Members, then the Monitoring Officer will consider whether the matter should be referred to the Public Services Ombudsman for Wales for investigation.
7. If the Chief Finance Officer reaches the conclusion that there does not appear to be an irregularity, and that the allegation appears unfounded, a full report will be prepared on the case for consideration by Internal Audit. Unless the Internal Auditors disagree with the conclusion reached by the Chief Finance Officer the case will be regarded as closed (except to the extent that Internal Audit determines that some refinement of financial control procedures is needed) on this basis.
8. Any investigation will be carried out in accordance with the principles of natural justice, and with due regard to the Human Rights Act 1998 and the statutory rights of all individuals involved in the case. Internal Audit will take all reasonable steps to ensure that an investigation is concluded as quickly as possible.
9. When the case is sufficiently serious, a member of staff who is accused of financial misconduct may be suspended while an investigation is under way, in accordance with the Authority's Disciplinary Procedure.
10. Any decision to refer a matter to the police will be taken by the Internal Audit Manager in consultation with the Chief Executive, relevant Director, Monitoring Officer and Chief Finance Officer. The Authority will normally wish the police to be made aware of, and investigate independently, offenders where financial impropriety is discovered.
11. Action may be taken under the Authority's Disciplinary Procedure against any member of staff found guilty of financial misconduct. Any such person may also be subject to

criminal charges, as well as civil legal action for the recovery of any monies misappropriated from the Authority.

12. On completion of an investigation a formal report will be submitted to the Authority, who will review the report and the actions taken to resolve the issue and may request further actions or require a further report to satisfy itself that the matter has been fully resolved. When an allegation of financial misconduct is upheld, the Authority will ensure that financial control procedures are improved as necessary to reduce the likelihood of recurrence.



<b>MEETING</b>	Standards Committee
<b>DATE</b>	27 March 2026
<b>TITLE</b>	<b>Confidential Reporting Policy (Whistle Blowing)</b>
<b>REPORT BY</b>	Head of Administration and Customer Care
<b>PURPOSE</b>	To review and update current policy

**1. BACKGROUND**

- 1.1. The Authority has adopted a suite of policies and procedures for maintaining high standards of conduct for both staff and Members, and to ensure accountability to the public.
- 1.2 Following on from the previous item, the Confidential Reporting Policy (Whistle Blowing) is the second policy to undergo a review.
- 1.3 Relevant legislation that informs this policy has been reviewed. The only significant change affecting the Authority will come into effect on the 6th of April 2026. The Employment Rights Act 2025 will amend the existing whistle blowing legislation to specifically include disclosures of sexual harassment as "qualified disclosure".
- 1.4 Under paragraph 5.2 of the current policy, 'physical, sexual or other abuse or harassment' is already listed as an example of an appropriate serious concern covered by the policy. Because of this, no further changes to the policy are considered necessary.

**2. RECOMMENDATION:**

- 2.1 To discuss and review the draft updated policy appended.
- 2.2 To approve the revised Confidential Reporting Policy (Whistle Blowing) for submission to the National Park Authority for adoption.

**ERYRI NATIONAL PARK AUTHORITY  
CONFIDENTIAL REPORTING POLICY  
(WHISTLE BLOWING)**



**1.0 DEFINITION OF WHISTLE BLOWING**

- 1.1 Whistle blowing is the disclosure of malpractice or illegality within an Authority to a person having the potential to stop such malpractice or illegality. This Policy explains how to “Whistle Blow” and to whom.

**2.0 BACKGROUND**

- 2.1 Employees are often the first to realise that there may be something seriously wrong within the Authority. However, they may not express their concerns because they fear harassment or victimisation or feel that speaking out would be disloyal to colleagues or to the Authority.
- 2.2 This Authority is committed to the highest standards of openness, probity and accountability. In line with that commitment the Authority encourages employees and others with serious concerns about the Authority’s work to come forward and voice those concerns within the Authority. It is recognised that certain cases may have to proceed on a confidential basis.
- 2.3 Under the Local Government Act 2000 and its Codes of Conduct for Members and Officers, emphasis is placed on the need for wrongdoing to be brought to the attention of the Authority and for those doing so to be protected from victimisation. A whistle blowing or reporting mechanism invites all employees to act responsibly to uphold the reputation of their organisation and maintain public confidence. Encouraging a culture of openness within an organisation will also help the process. This policy aims to ensure that serious concerns are properly raised and addressed within the Authority.

**3.0 THE PUBLIC INTEREST DISCLOSURE ACT 1998**

- 3.1 The Act provides that a dismissal or selection for redundancy of an employee is automatically unfair if it is for making a Qualifying Disclosure in good faith to someone to whom s/he is entitled to make it or to penalise her/him for doing so.
- 3.2 A Qualifying Disclosure is defined as a disclosure which tends to disclose one or more of the following:
- That a criminal offence has been committed, is being committed or is likely to be committed;
  - That a person has failed, is failing or is likely to fail to comply with any legal obligation to which s/he is subject;

- That a miscarriage of justice has occurred, is occurring or is likely to occur;
  - That the health or safety of any individual has been, is being or is likely to be endangered;
  - That the environment has been, is being or is likely to be damaged; or
  - That 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.
- 3.3 A disclosure of information is not a qualifying disclosure if the person making the disclosure commits an offence by making it e.g. using illegal means like hacking to get evidence for the report.
- 3.4 A disclosure of information in respect of which a claim to legal professional privilege could be maintained in legal proceedings is not a qualifying disclosure if it is made by a person to whom the information had been disclosed in the course of obtaining legal advice e.g. Solicitor.
- 3.5 A qualifying disclosure will be protected if the employee discloses it:
- In the course of obtaining legal advice;
  - To the employer;
  - In certain circumstances to a Minister of the Crown;
  - To a “prescribed person” reasonably believing that the information and any allegation contained within it are true. The Secretary of State prescribes by list both the identity of the prescribed person (usually a regulatory body) and its remit. The Department for Business Innovation and Skills has published a list of prescribed persons together with a brief description of the matters that can be reported to each prescribed person. Further information including a link to the list of prescribed persons can be found on the GOV.UK website: [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing); or
  - To any person or body provided that a number of detailed conditions are satisfied. Those conditions include a requirement that the worker does not make the disclosure for purposes of personal gain and a requirement that it is reasonable to make the disclosure in the circumstances. A further section makes provision for a disclosure of an exceptionally serious failure to any person or body.

#### **4.0 AIMS OF THIS POLICY**

- To inform employees how to raise serious concerns.
- To encourage employees to feel confident that genuine concerns can be raised without fear of reprisals.
- To assure employees that legitimate concerns will be thoroughly and fairly investigated.
- To ensure that whistle blowers receive feedback on any action taken.
- To describe how a matter can be taken further.

## **5.0 SCOPE OF THE POLICY**

5.1 The Confidential Reporting Policy (also known as the Whistle Blowing Policy) is not intended to replace existing procedures. For example, there is already in place the Authority's own Complaints Procedure for the right of a member of the public to complain to the Public Services Ombudsman for Wales about the Authority, or to allege that a Member has breached the Authority's Code of Conduct. Internally, an employee is already able to use the Grievance Procedure and other approved policies in relation to their own employment (all relevant Authority policies are available on the staff Intranet). The Whistle Blowing Policy however is intended to cover concerns that fall outside the scope of these other procedures or that it is of such a serious nature that it falls within the definition of a Qualifying Disclosure listed under 3.2.

5.2 Examples of serious concerns that properly fall under this policy could include:

- An unlawful act whether civil or criminal
- Maladministration
- Breach of any Statutory Code of Practice or Conduct
- Breach of or failure to implement or comply with any Standing Orders or policies determined by the Authority
- Fraud or corruption
- Dangerous practice likely to cause physical harm/damage to any person/property
- Physical, sexual or other abuse or harassment
- Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss of income to the Authority or which would otherwise prejudice the Authority
- Abuse of power or the use of Authority powers for unauthorised or ulterior purposes
- Unfair discrimination in the course of the Authority's employment or provision of its services

5.3 The Policy is provided primarily for use by employees of the Authority but may also be used by others (e.g. Members and contractors) as appropriate. References to 'employees' should be deemed to include others as appropriate. However, separate procedures apply to complaints by Members against the actions of Members, and to complaints by members of the public.

## **6.0 SAFEGUARDS**

### **6.1 Harassment or Victimisation**

- The Authority recognises that the decision to report a concern can be a difficult one, not least because of the fear of reprisal from those responsible for the malpractice. Employees who make an allegation in good faith should have nothing to fear as they will be doing their duty to their employer, colleagues, and to the public.
- The Authority will not tolerate harassment or victimisation, and if they occur, they will be liable to disciplinary action.
- Where the concern raised relates to an employee's Line Manager the Authority will ensure that the relationship is monitored, both during the course of any investigation, and subsequently.

## 6.2 Confidentiality

The Authority will do its best to protect the identity of employees who raise a concern and who do not want their name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and that a statement by the employee may be required to enable the investigation to be taken forward.

## 6.3 Anonymous Allegations

This Policy encourages employees to make any allegations in writing and to put their name to the allegation. Concerns expressed anonymously are much less powerful and are more difficult to investigate. Further it will be more difficult to protect the informant's position and provide feedback. However, even anonymous allegations will be considered and may be pursued at the discretion of the Authority. In exercising the discretion, the factors to be taken into account would include:

- The seriousness of the issues raised;
- The credibility of the concerns; and
- The likelihood of confirming the allegation from attributable sources.

## 6.4 Unfounded Allegations

Provided an employee makes an allegation in good faith no action will be taken against them, even if the allegation is not borne out by an investigation. However, it is important that the Authority also protect employees and Members who may be the subject of unfounded allegations. Accordingly, it must be clearly understood that employees who make malicious, vexatious or repeated allegations may have disciplinary action taken against them.

## 7.0 HOW TO RAISE A CONCERN

- 7.1 If employees have a concern they should not approach or accuse individuals directly or attempt to investigate the matter themselves.
- 7.2 It is recognised that raising a concern can be a daunting experience for an employee. Accordingly, a nominated human resources representative will be available from start to finish to provide advice and guidance to both the employee and the Authority.
- 7.3 Normally, the concern should be raised with the employee's line manager, Head of Service or Director. However it is appreciated this may depend on the seriousness and sensitivity of the issues involved, and who is thought to be involved in the malpractice. Accordingly in a suitable case employees may prefer to approach the Chief Executive (National Park Officer), any Director, the Chief Finance Officer, Head of Finance or Head of Human Resources.
- 7.4 Initially you may contact or arrange to meet the appropriate officer. However, if the matter is to be investigated, concerns are far better raised in writing. Employees are invited to set out the background and history of the concern giving names, dates, places, and other details wherever possible and the reason why they are particularly concerned about the situation. The earlier employees express their concern the easier it will be to take action.
- 7.5 Although employees are not expected to prove the truth of an allegation they will need to demonstrate to the person contacted that there are reasonable and sufficient grounds for their concern.
- 7.6 Employees may invite their Trade Union or professional association to raise a concern on their behalf.
- 7.7 If you have concerns which you feel unable for whatever reason to raise within the Authority you should raise the matter with one of the external points referred to in

paragraph 9.2 at the end of this document or by contacting a prescribed person as set out in paragraph 3.5 above.

## **8. THE AUTHORITY'S RESPONSE**

8.1 In order to protect individuals and the Authority initial enquiries will be made before deciding whether an investigation is appropriate and, if so, what form it should take.

However, testing out your concerns is not the same as either accepting or rejecting them. Some concerns may be resolved without the need for investigation.

8.2 If an investigation is deemed appropriate the action taken by the Authority will depend on the nature and seriousness of the concern. The issues arising may:

- Be investigated internally e.g. by the Monitoring Officer, by the Chief Finance Officer, the Head of Human Resources or appropriate Manager.
- Be referred to Internal Auditors.
- Be referred to the Audit Wales.
- Be referred to the Police.
- Form the subject of an independent enquiry e.g. by the Public Services Ombudsman for Wales.

8.3 Within five working days of the written concern being received the Authority will respond in writing:

- Acknowledging that the concern has been received;
- Indicating how it proposes to deal with the matter;
- Giving an estimate of how long it is likely to take to reach findings on the concern raised;
- Indicating whether initial enquiries have been made; and
- Indicating whether further investigations will take place and if not the reasons why.

8.4 The amount of contact between the person raising the concern and officers considering the matter will depend upon the nature of the issues raised, the potential difficulties involved, and the clarity of the information provided. In any event however, if it proves necessary to proceed the Authority will still endeavour to provide appropriate feedback.

8.5 If a meeting is arranged, employees will be entitled, if they so desire, to be accompanied by a Trade Union representative or work colleague.

8.6 The Authority will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Authority will arrange for you to receive advice about the procedure.

8.7 The Authority accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

## 9 HOW THE MATTER CAN BE TAKEN FURTHER / PROCEEDING EXTERNALLY

- 9.1 This policy is intended to provide a procedure whereby concerns raised are dealt with fairly and thoroughly within the Authority. By using this procedure employees will help the Authority achieve this.
- 9.2 It is hoped that employees will be satisfied by action taken by the Authority. However, if they are not, or feel the need to raise the matter outside the Authority the following are possible contact points:
- Their Trade Union
  - Relevant professional bodies or regulatory organisations
  - Audit Wales
  - Public Services Ombudsman for Wales
  - Health and Safety Executive
  - The charitable organisation [Protect](#)
  - The Police
- 9.3 If employees do take the matter outside the Authority, and so make disclosure outside of this Policy, they should ensure they do not disclose confidential information unless that disclosure is privileged and relevant to the concern raised. Confidential Information can include personal information about employees. Anyone proposing external disclosure should seek independent legal advice as there are in some circumstances detailed conditions that have to be satisfied if a disclosure is to be a protected disclosure.
- 9.4 This policy will be reviewed every five years unless the Monitoring Officer is of the opinion that internal or external changes affecting the Authority make it advisable to review the policy at an earlier date.

Updated policy adopted:	
Next revision date:	

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