

# Draft whistleblowing policy

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## What is whistleblowing?

1. Public Concern at Work (a charity that provides independent advice and information on whistleblowing) gives the following explanation:

‘When someone blows the whistle they are raising a concern about danger or illegality that affects others (e.g. customers, members of the public, or their employer). The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concern – they are simply trying to alert others. For this reason, the whistleblower should not be expected to prove the malpractice. He or she is a messenger raising a concern so that others can address it.’

## Links to strategic objectives

2. This response plan underpins all of the council’s strategies, initiatives and work plans.

## Purpose of the whistleblowing policy

3. This is a joint policy adopted by South Oxfordshire District Council and Vale of White Horse District Council. The policy aims to provide guidance on how to raise concerns within the relevant council.
4. In carrying out their functions and responsibilities, the councils wish to promote a culture of openness and fairness and expect all those who work for and with the council to adopt the highest standards of propriety and accountability.
5. However, the councils face the risk that something may go wrong and they welcome the opportunity to address those risks as early as possible. Whenever a situation arises, the first people to know of the risk can often be those who work in or for a council. Whilst they are the people best placed to raise the concern before damage is done, they often fear they have the most to lose if they speak out.
6. The councils can overcome a culture of silence by encouraging openness, which will benefit them by:
  - deterring wrongdoings
  - picking up potential problems early on
  - enabling critical information to get to the people who need to know and can address the issue
  - demonstrating the councils are accountable and well managed
  - reducing the risk of anonymous and malicious leaks
  - minimising the costs and compensation from accidents, investigations, litigation and regulatory inspections
  - maintaining and enhancing their reputations.

7. Consequently, the councils agree that it makes good business sense to support whistleblowing. Not taking action could result real damage occurring.
8. To this end, the councils commit to the highest possible standards of openness, honesty and accountability in their activities. They expect a high standard of conduct and integrity from those that work with and for the council, particularly councillors and their staff.
9. The councils will take seriously and investigate all reports of improper activities. This whistleblowing policy aims to ensure that when people raise concerns in the right way, the councils will address the concerns and protect the person raising the concern.
10. The councils aim to mitigate the risk of inappropriate behaviour by those undertaking work on behalf of either or both councils. To mitigate the risks of inappropriate behaviour the councils will refer to this policy in its contracts with suppliers and its contracts procedure rules and procurement guide.

### **Who this policy applies to**

11. This policy will help employees (including temporary and agency staff), councillors, co-optees on the council's committees, partners, contractors, suppliers, voluntary organisations and members of the public to understand how and when to contact the relevant council with their concerns.
12. All councillors and employees have a responsibility to their colleagues, the councils and the community to ensure that they draw attention to any suspected malpractice or irregularity and that it is dealt with promptly. This responsibility is clarified in paragraphs 13 and 14.
13. In accordance with South Oxfordshire District Council's Financial Procedure Rules within its Constitution, "a councillor or member of staff or any organisation or person acting on behalf of the council shall notify the council immediately of any financial or accounting irregularity, or suspected irregularity, or of any circumstances which may suggest the possibility of such loss or irregularity, including those affecting cash, stores, property, remuneration or allowances"
14. In accordance with Vale of White Horse District Council's Financial Regulations, "where any officer becomes aware of any loss or irregularity, or suspected irregularity, affecting cash, stock, property, computer held data, or other matters having implications of a financial nature, they shall report the matter immediately to their chief officer".
15. Members of the public may also have concerns, but not know how to and when to express them.

## What this policy covers

16. This policy aims to address serious concerns about inappropriate behaviour that is not covered by other procedures. Concerns may be about the following (the list is not exhaustive):

- any criminal offence, particularly fraud or corruption
- unauthorised use of public funds
- a failure to comply with a legal obligation
- the endangering of an individual's health and safety
- damage to the environment
- actions contrary to the councils' standing orders, contracts procedure rules financial regulations or policies
- actions or behaviour that fall below established standards of employment practice, including councillors' and employees' codes of conduct
- a person abusing their position for any unauthorised purpose or for personal gain
- harassment, discrimination or victimisation
- the deliberate concealment of information relating to any of the above matters
- other unethical conduct or any intention to conceal any of the above.

### **Note:**

As well as using this policy, anyone making a report of fraud or corruption should refer to the relevant council's anti fraud and corruption policy with the associated response plan for guidance.

## WHAT THIS POLICY DOES NOT COVER

17. This policy does not deal with matters that other procedures cover, such as:

- employees' complaints about their terms and conditions of employment.

The relevant council will deal with these through the grievance procedure.

- complaints from members of the public about either council's services.

The relevant council will deal with these through its own complaints procedure. However, a member of the public may report a whistleblowing concern using the relevant council's complaints procedure.

- staff bringing to a manager's attention any deficiency in the provision of service.

To do this is not whistleblowing under the employees' code of conduct unless there was some serious failing of the type listed in paragraph 16 above.

- complaints about the behaviour of councillors or co-optees (those invited to join the councils' committees as independent members or because of their expertise) where the code of conduct covers the alleged behaviour.

- allegations of abuse against a child, young person or vulnerable adult.

You should report these allegations to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.

## IS IT A GRIEVANCE OR IS IT WHISTLEBLOWING?

18. Whistleblowing is where a person has a concern about a danger or illegality that has a public interest aspect to it, usually because it threatens others (for example customers or the public). On the other hand, a grievance or private complaint is a dispute about the employee's own employment position and has no public interest dimension.

19. Where issues involve other policies or maybe a formal grievance, the relevant council will consider the facts, assess the risks and decide how it will best deal with the matter. The relevant council will make its reasons known.

## Protection for whistleblowers

20. In accordance with the Public Interest Disclosure Act 1998 (often referred to as the whistleblowing act), the councils will protect as best they can an employee who blows the whistle from personal claims, victimisation, harassment or bullying as a result of his or her disclosure and will not initiate any disciplinary action against them so long as the disclosure was:

- made in good faith
- reasonably believed to be substantially true, and
- not made for personal gain.

21. The councils will not tolerate threats of victimisation to whistleblowers, which includes deterring them from raising concerns or suppressing concerns they have raised.

22. Any employee taking any reprisal or similar action against a whistleblower because he or she has made a disclosure under this policy will be subject to disciplinary action by their council.

23. Similarly, any councillors or co-optees taking such action will be reported to the monitoring officer as a code of conduct complaint.

24. Depending upon the situation, the relevant council will treat matters of concern raised with as much confidentiality as possible. The councils will not reveal names or positions without permission, unless it is required to by law, or an enquiry results in a criminal investigation in which the whistleblower might be required as a witness. However, whistleblowers should be aware that their identity might become known when the relevant council starts making enquiries. The relevant council will explain this at the time a whistleblower raises a concern, so the whistleblower can decide whether to proceed. The councils will also keep the whistleblower informed if the situation significantly changes.

25. A trade union representative, a fellow employee or an interpreter may accompany whistleblowers who give evidence during disciplinary hearings.
26. Any disciplinary or redundancy procedures that already affect the whistleblower will not influence any investigation into allegations of potential malpractice if properly made.
27. The protection outlined above will not apply and the employee may be subject to disciplinary action where the employee acts in a malicious or improper way (for example by leaking information to the press before the relevant council has had a chance to investigate).

## **Anonymous allegations**

28. The councils encourage whistleblowers to give their name when making an allegation. The relevant council will do all it can to protect the whistleblower. Concerns raised anonymously tend to be far less effective and if, for example, the relevant council does not have enough information, it may not be able to investigate the matter at all.
29. Also, from a practical point of view, the council concerned cannot provide protection to a person whose identity they do not know. It then becomes more difficult to judge whether the person raised the concern in good faith or maliciously.
30. If whistleblowers consider that they cannot give their name, the relevant council will make a judgement on whether or not to consider the matter depending on:
  - the seriousness of the issue
  - whether the concern is believable
  - whether it can sufficiently investigate the case based on the information provided.

## **Untrue allegations**

31. If a whistleblower makes an allegation which they believe is true, but it is not confirmed by investigation, the relevant council will not take any action against them.
32. However, if a whistleblower makes a deliberately false or malicious allegation that they know is untrue, the relevant council will take appropriate disciplinary or legal action against them. The Public Interest Disclosure Act 1998 does not protect people making allegations of this nature.

## **How to raise a concern**

33. Whistleblowers should not attempt to investigate any concern themselves, but should raise their concern using one of the avenues set out below.

34. A person wishing to raise a concern that involves Vale of White Horse District Council should use the contact details for that council – these appear at paragraph 46. A person wishing to raise a concern that involves South Oxfordshire District Council should use the contact details for that council – these appear at paragraph 46.
35. The councils encourage whistleblowers to raise concerns promptly, preferably in writing, giving as much information as possible, such as relevant background information, names, dates, places and the reason for the concern. However, a person can raise a concern by telephone or by meeting the appropriate employee. The earlier a person raises a concern, the easier it will be to take effective action.
36. Although the whistleblower does not need to prove beyond doubt that an allegation is true, the councils expect a whistleblower to demonstrate that reasonable grounds exist for voicing their concern.
37. The council will ask any councillor, co-optee, employee or others engaged by the council, who makes an allegation under this policy to declare any interest they may have in the concern they raise.
38. In matters concerning the health, safety and welfare of those on council premises anyone, including an elected safety representative, who becomes aware of a hazard (actual or potential) or dangerous occurrence should immediately notify the relevant council's health and safety officer. They should do this before contacting anybody else to ensure that the relevant council can take immediate action if necessary to deal with the hazard.

#### EMPLOYEES EMPLOYED BY EITHER COUNCIL

39. In the first instance, a council employee should raise a concern with their immediate manager. If not their manager, they should raise the concern with their head of service. The document 'Guidance for employees – how to react to concerns of inappropriate behaviour' in appendix 1, gives information on how to do this. If the allegation relates to the suspected abuse of a child, young person or vulnerable adult, this should be reported to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.
40. Guidance on how to deal with a concern is contained in the document 'Guidance for managers – how to react to concerns of inappropriate behaviour' in appendix 2.
41. If the employee considers that it is inappropriate to raise a concern with their manager or head of service, given the person involved and/or the seriousness or sensitivity of the matter, they should contact one of the following:
  - The chief executive
  - A strategic director
  - The head of legal and democratic services (as the monitoring officer)
  - The internal audit manager

42. If a concern involves one of the employees listed in paragraph 41, or if the whistleblower believes these employee(s) may be biased, they should refer the matter directly to the chief executive.

43. If a concern involves the chief executive, the whistleblower should refer the matter to the monitoring officer.

#### COUNCILLORS, CO-OPTES AND MEMBERS OF THE PUBLIC

44. If someone who is not an employee of the council wishes to raise a concern, they should do so with one of the people listed in paragraph 41. Members of the public can report any concerns through the council's complaints procedure.

45. If the allegation relates to the suspected abuse of a child, young person or vulnerable adult, the person should report it to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.

#### MAKING CONTACT

46. A person can contact the monitoring officer, who is responsible for the relevant council's whistleblowing policy, in any of the following ways:

##### **South Oxfordshire District Council**

- In writing to the head of legal and democratic services (as the monitoring officer) at:  
South Oxfordshire District Council,  
Benson Lane,  
Crowmarsh Gifford,  
Oxfordshire  
OX10 8QS  
*Please write 'For the personal attention of the monitoring officer' on your envelope*
- By telephone: 01491 823000 (via the council's switchboard) or direct on 01491 823656
- By email: [monitoringofficer@southoxon.gov.uk](mailto:monitoringofficer@southoxon.gov.uk)
- The council also has a dedicated anti-fraud hotline, which is available 24 hours a day on **0800 169 5716** or email: [fraud@southoxon.gov.uk](mailto:fraud@southoxon.gov.uk).

##### **Vale of White Horse District Council**

- By writing to the head of legal and democratic services (as the monitoring officer) at:  
Vale of White Horse District Council  
Council Offices  
Abbey House  
Abingdon

OXON  
OX14 3JE

*Please write 'For the personal attention of the monitoring officer' on your envelope*

- By telephone: 01235 520202 (via the council's switchboard) or direct on 01235 540407
- By email:
- Calling the Vale of White Horse District Council's confidential 24-hour benefit fraud hotline **01235 540330**. During office hours you can speak to a person. The council has an answer phone available outside office hours. The council treats all information in confidence. The council has further information on benefit fraud on its [website](#).

## Withdrawing the complaint

47. The whistleblower may make a request to withdraw any allegations made under the whistleblowing policy. They will need to contact the monitoring officer confirming that they wish to stop the process. The monitoring officer will ask them to put their withdrawal request in writing and their reasons for doing so. A whistleblower should bear in mind that the relevant council may not be able to stop the process if there was any substance to the allegations.

## Help for the whistleblower

48. People who do not work for the council might want to discuss their concern with a friend or colleague first. They may then find it easier to raise a concern if others share the same experiences or concerns.
49. Trade union representatives can give support and advice to employees or act on their behalf if this would help. This could be useful, particularly if the employee wishes to remain anonymous, to the extent that is possible.
50. The councils will encourage the trades unions to support any member of staff who raises a concern with them.
51. Public Concern at Work (PCAW) can offer free, confidential advice to people concerned about crime, danger or wrongdoing at work. Anyone can contact them in the following ways

Public Concern at Work (PCAW)  
Suite 301  
16 Baldwin Gardens  
London  
EC1N 7RJ  
t: 020 7404 6609  
f: 020 7404 6576  
e: [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk)

## **The recipient's role in acting on a whistleblowing report**

52. On receiving an allegation, the recipient (it is generally assumed that this would be a line manager or the head of service within the relevant council) should:
- only listen to and note the concerns of the individual but must not attempt to carry out any investigation as this may damage any future enquiry if evidence is not in a legally admissible form
  - make this policy available to the person making the report
  - follow the guidance in appendix 2 to this policy
53. Having received the allegation, the recipient should contact the monitoring officer.

## **How the relevant council will respond**

54. In order to protect individuals and the council concerned the monitoring officer, who has the authority to act independently, will deal with initial enquiries. The purpose of the initial enquiry is to confirm or repudiate the suspicions that have arisen so that, if necessary, the council should instigate a further investigation.
55. If the concern raised involves the monitoring officer, the chief executive will initially deal with the allegation and will nominate a responsible employee to conduct initial enquiries with the same authority that the monitoring officer would have.
56. During the initial enquiry, the monitoring officer will:
- determine the factors that gave rise to the suspicion
  - examine factors to determine whether any irregularity has occurred (i.e. any incident or action that is not part of normal operation of the system or the expected course of events) and
  - where necessary, carry out discreet enquiries with staff and/or review documents.
57. The monitoring officer will consult with the chief executive, the section 151 (chief finance) officer and the internal audit manager. They will agree whether an investigation is appropriate and, if so, whether the responsibility will pass to the section 151 (chief finance) officer and what form that responsibility should take. The matter could involve:
- investigation by management, internal audit, or through the disciplinary process
  - referral to the police
  - referral to the Audit Commission (external auditor)
  - an independent inquiry.
58. In dealing with any allegations, the monitoring officer, section 151 (chief finance) officer or the chief executive will ensure that those officers who would usually respond to allegations of malpractice, will not be involved in any enquiries or investigations, if they are implicated in the allegation.

59. The relevant council will normally refer concerns or allegations that fall within the scope of other policies and procedures for consideration under those procedures and will advise the whistleblower accordingly.
60. The monitoring officer, or section 151 (chief finance) officer (if responsibility for the case has passed to them), can decide to take no further action if a complaint appears to be trivial or malicious.
61. Within 10 working days of a concern being received, the council will write to the whistleblower to:
- acknowledge receipt of the concern
  - explain how the council proposes to deal with the matter
  - indicate whether any initial enquiries have been made
  - state whether further investigations will take place and if not, why not.
62. The amount of contact between the people dealing with the allegation and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. The monitoring officer, or section 151 (chief finance) officer (if responsibility for the case has passed to them), will make the relevant council's final decision upon the level of contact or involvement with the whistleblower. They may inform the whistleblower that there is no further need for their involvement.
63. Any meetings arranged will normally take place at the relevant council's offices but that council can agree to have the meeting elsewhere. At any meetings, a friend, a representative from a trade union or professional association, or an interpreter can accompany the whistleblower.
64. The relevant council will take steps to reduce any difficulties that the whistleblower may experience after raising a concern. For instance, if the whistleblower needs to give evidence in criminal or disciplinary proceedings, the relevant council will provide support and advice on the procedures.
65. The councils accept that in the working environment members of staff need assurance that the relevant council has properly addressed the matter raised. Thus, subject to legal constraints, the council will provide information to the member of staff about the outcome of any investigation.
66. If responsibility for the case has passed to the section 151 (chief finance) officer, they will advise the monitoring officer of the outcome of the case to enable the monitoring officer to fulfil their reporting responsibilities under this policy.
67. The monitoring officer will report as necessary all concerns raised and the outcomes (in an anonymous format) to the Audit and Corporate Governance Committee at South Oxfordshire District Council and the Audit and Governance Committee at Vale of White Horse District Council.

## Taking further action

68. This policy aims to provide an avenue to raise concerns within the relevant council.

69. If the whistleblower decides to take the matter outside the council, they must ensure that they do not disclose information about a third party e.g. a company or a private individual, which may be confidential.

70. Before taking matters to an external body, the council advises the whistleblower to seek independent legal advice.

71. If an individual considers they should take the matter outside this process, the following are possible contact points:

- The Audit Commission's dedicated telephone [hotline](#) for receiving disclosures – 0845 0522 646
- The local Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- The Environment Agency
- The police (if it is potentially a criminal matter)
- The Health and Safety Executive
- A relevant voluntary organisation
- A trades union
- The Local Government Ombudsman
- Equality and Human Rights commission
- Public Concern at Work

72. If a whistleblower, having raised a concern directly with the council, is dissatisfied with the outcome, they can also contact any of the above organisations.

## Person responsible for this policy

73. The monitoring officer has overall responsibility for the maintenance and operation of this policy, and will liaise as necessary with the chief executive, the section 151 (chief finance) officer and internal audit manager.

This policy was approved by South Oxfordshire District Council's Cabinet on <> on <date>

This policy was approved by Vale of White Horse District Council's <> on <date>

Policy review date: December 2012

## Additional sources of information

The following are associated policies and procedures that are referred to in this policy or can be used as additional sources of information:

<b>Joint policies: South and Vale</b>	<b>South Oxfordshire District Council policies</b>	<b>Vale of White Horse District Council policies</b>
Anti-fraud and corruption policy and response plan		
	Budget and policy framework procedure rules	Budget and policy framework procedure rules
	Code of conduct for councillors and its associated complaints procedure	Code of conduct for councillors and its associated complaints procedure
	Code of conduct for employees	Staff code of conduct
	Complaints policy and procedure	How to make a comment, complaints and suggestion
	Contracts procedure rules	Contracts standing orders
	Councillors' allowances scheme	Members' allowances scheme
Dignity at work policy		
Disciplinary procedure (for employees)		
	Financial procedure rules	Financial regulations
	Gifts and hospitality guidance for officers	Gifts and hospitality code
Grievance procedures (for employees)		
	Local code of governance	
Money laundering policy (scheduled for availability March 2010)		
	Planning code of good practice for councillors	
	Protocol on councillor/employee relations	Member/officer relations
Safeguarding children and vulnerable adults policy		
	Scheme of delegation	Scheme of delegation
	Service specific procedure manuals	Service specific procedure manuals

# Appendix 1

## Guidance for employees

### HOW TO REACT TO CONCERNS OF INAPPROPRIATE BEHAVIOUR

The action that you take when you first suspect inappropriate behaviour may be crucial. This guidance tells you what you should and should not do if you suspect inappropriate behaviour affecting the council.

Inappropriate behaviour is described in the council's whistleblowing policy as:

- any criminal offence, particularly fraud or corruption
- unauthorised use of public funds
- a failure to comply with a legal obligation
- the endangering of an individual's health and safety
- damage to the environment
- actions that are contrary to the council's standing orders, financial regulations or other policies
- actions or behaviour that fall below established standards of practice, including councillors' and employees' codes of conduct
- a person abusing their position for any unauthorised purpose or for personal gain
- harassment, discrimination or victimisation
- the deliberate concealment of information relating to any of the above matters
- other unethical conduct that is intended to conceal any inappropriate behaviour set out above.

Note: if you suspect abuse of a child, young person or vulnerable adult, you should report it to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy

### ACTING UPON YOUR SUSPICIONS – THE DO'S AND DON'TS

If you suspect inappropriate behaviour affecting the council, there are a few simple rules that you should follow to help the council with subsequent enquiries:

#### Do

- ✓ make an immediate note of your concerns and note as many relevant details as possible, ideally:
  - the background details and nature of your suspicions (including relevant names, dates and locations)
  - details of the job and responsibilities of the individuals involved
  - action (if any) you have taken to date before this concern was raised
- ✓ communicate your suspicions to someone with the appropriate authority and experience in accordance with the council's whistleblowing policy.
- ✓ deal with the matter promptly if you consider your concerns are warranted.

Any delay may result in accidents, cause the council to suffer loss or make further enquiries more difficult.

**Don't**

- × do nothing.
- × be afraid to raise your concerns.

You will not suffer any recrimination from the council as a result of voicing your reasonably held concerns. The council will treat the matter sensitively and confidentially if it is able to, and will take reasonable steps to protect you.

- × approach or accuse any individuals directly.
- × try to investigate the matter yourself.

There are special rules about gathering evidence.

Any attempt to gather evidence by people who are unfamiliar with these rules may weaken or destroy any future prosecution may be appropriate.

- × convey your suspicions to anyone other than those indicated in the council's whistleblowing policy.

The Public Interest Disclosure Act 1998 will protect you from any reprisals as long as you meet the rules set out in the Act.

The rules are:

- you must disclose the information in good faith
- you must reasonably believe it to be substantially true
- you must not seek any personal gain.

74. Public Concern at Work (PCAW) can offer free, confidential advice to people concerned about crime, danger or wrongdoing at work. Anyone can contact them in the following ways

Public Concern at Work (PCAW)  
Suite 301  
16 Baldwin Gardens  
London  
EC1N 7RJ  
t: 020 7404 6609  
f: 020 7404 6576  
e: [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk)

# Appendix 2

## Guidance for managers

### HOW TO REACT TO CONCERNS OF INAPPROPRIATE BEHAVIOUR

The action that you take when you first identify, or are made aware of suspected inappropriate behaviour, may be crucial in determining the success of any subsequent investigation.

Inappropriate behaviour is described in the council's whistleblowing policy as:

- any criminal offence, particularly fraud or corruption
- unauthorised use of public funds
- a failure to comply with a legal obligation
- the endangering of an individual's health and safety
- damage to the environment
- actions that are contrary to the council's standing orders, financial regulations or any other approved policies
- actions or behaviour that fall below established standards of practice, including councillors' and employees' codes of conduct
- a person abusing their position for any unauthorised purpose or for personal gain
- harassment, discrimination or victimisation of either staff or clients
- the deliberate concealment of information relating to any of the above matters
- other unethical conduct that is intended to conceal any inappropriate behaviour set out above.

Note: if someone suspects abuse of a child, young person or vulnerable adult, they should report it to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.

As a manager, you should be familiar with the council's anti-fraud and corruption policy and its whistleblowing policy so that you are well equipped to deal with allegations if they arise.

### ACTING UPON YOUR SUSPICIONS – THE DO'S AND DON'TS

The following simple rules should help to ensure that matters are properly handled:

#### Do

- ✓ be responsive to employees' concerns.

You should encourage employees to voice any reasonably held concerns or suspicions. As a manager, you should treat them seriously, confidentially and sensitively. You should reassure the individual that they will not suffer because of concerns raised in good faith.

- ✓ note all relevant details

Details should ideally include:

- the background details and nature of the suspicions (including relevant names, dates and locations)
- details of the job and responsibilities of the individuals involved
- the reasons why the person is raising the concerns
- action (if any) taken to date before this concern was raised

Get as much information as possible from the employee reporting the suspicion and encourage them to record this in writing. If the employee has made any notes, make sure you get a copy of these.

In addition, note any documentary evidence that may exist to support the allegations, but do not interfere with this evidence in any way.

- ✓ contact the monitoring officer to discuss the report you have received.
- ✓ if in doubt, report your suspicions anyway.

If you decide that no further action is necessary, you must record your decision and inform the monitoring officer of the original notification details and your reasons why you consider no further action is necessary. In recommending that no further action is necessary, be objective when evaluating the issue. Consider the facts as they appear based on the information you have to hand. The monitoring officer will then help to determine if further action is necessary.

- ✓ deal with the matter promptly, particularly if you consider your concerns are warranted, and bearing in mind the 10 day deadline that the council has set to respond to the whistleblower..

Any delay may cause the council to suffer financial or reputational loss, or make enquiries more difficult.

### **Don't**

- × ridicule or belittle any suspicions raised by employees.

The council cannot operate an effective anti-fraud and corruption culture or whistleblowing policy if employees are reluctant to pass on their concerns to management out of fear of ridicule or recrimination.

You need to ensure that you give all employee concerns a fair hearing. You should reassure employees that they will not suffer recrimination by raising any reasonably held suspicion.

- × approach the suspect or accuse any individuals directly.

- x communicate your suspicions to anyone other than those indicated in the council's whistleblowing policy.
- x try to investigate the matter yourself.

Remember that investigations by employees who are unfamiliar with the requirements of evidence are highly likely to jeopardise a successful outcome. They may also alert the suspect and result in the destruction of evidence.

Remember that your primary responsibility is to report the issue and all associated facts to the appropriate employee, wherever possible.

**Alternative formats of this publication are available on request. These include large print, Braille, audio cassette or CD, email and alternative languages.**

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**Please contact democratic services at South Oxfordshire District Council on ☎ 01491 823649**

**Please contact <> at Vale of White Horse District Council on ☎ 01235 <>**