



The Law Reform Commission

APPENDIX B

Samples of whistleblower internal policies

The following policy is an excerpt from:

The AICPA Audit Committee Toolkit, Copyright © 2005 by the American Institute of Certified Public Accountants, Inc., New York, New York, published on the [website](#) of the American Institute of Certified Public Accountants. It is offered as an example only. The National Council of Nonprofits encourages all nonprofits to check their state laws pertaining to whistleblower protections and to seek competent legal advice prior to adopting a whistleblower policy.

ABC Organization Whistleblower Policy

General

The ABC Organization Code of Conduct (hereinafter referred to as the Code) requires directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the ABC Organization Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of directors, volunteers and employees reporting concerns from retaliatory actions.

Reporting Responsibility

Each director, volunteer, and employee of ABC Organization has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of ABC Organization's Code (hereinafter collectively referred to as Concerns).

Authority of Audit Committee

All reported Concerns will be forwarded to the Audit Committee in accordance with the procedures set forth herein. The Audit Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise Concerns within the Organization for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Reporting Concerns

Employees

Employees should first discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern to the Director of Human Resources. In addition, if the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the Concern, the individual should report his or her Concern directly to the Director of Human Resources.

If the Concern was reported verbally to the Director of Human Resources, the reporting individual, with assistance from the Director of Human Resources, shall reduce the Concern to writing. The Director of Human Resources is required to promptly report the Concern to the Chair of the Audit Committee, who has specific and exclusive responsibility to investigate all Concerns. If the Director of Human Resources, for any reason, does not promptly forward the Concern to the Audit Committee, the reporting individual should directly report the Concern to the Chair of the Audit Committee. Contact information for the Chair of the Audit Committee may be obtained through the Human Resources Department. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the Chair of the Audit Committee.

Directors and Other Volunteers

Directors and other volunteers should submit Concerns in writing directly to the Chair of the Audit Committee. Contact information for the Chair of the Audit Committee may be obtained from the Chief Financial Officer.

Handling of Reported Violations

The Audit Committee shall address all reported Concerns. The Chair of the Audit Committee shall immediately notify the Audit Committee, the President, the Executive Director, and Chief Operating Officer of any such report. The Chair of the Audit Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the Audit Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern.

The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the Codes. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Instructions for Using This Tool. Before using this tool, the audit committee should review any applicable state or local laws or regulations, and the appropriate rules promulgated by other relevant regulatory bodies, if any.



SAMPLE WHISTLEBLOWER POLICY

Provided by:
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Purpose

The ABC Association is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and ABC's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns regarding ABC, such as concerns regarding:

- U incorrect financial reporting;
- U unlawful activity;
- U activities that are not in line with ABC policy, including the Code of Business Conduct; or
- U activities, which otherwise amount to serious improper conduct.

Safeguards

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- U The seriousness of the issue raised;
- U The credibility of the concern; and
- U The likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations - Allegations in bad faith may result in disciplinary action.

Procedure: 1. Process for Raising a Concern

Reporting- The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to: [your general counsel's name, title, telephone number, address, email address]



SAMPLE WHISTLEBLOWER POLICY



Employment-related concerns should continue to be reported through your normal channels such as [your supervisor, Director of Administration,] or to the President and CEO.

SAMPLE WHISTLEBLOWER POLICY

Timing - The earlier a concern is expressed, the easier it is to take action.

Evidence - Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.

Procedure: 2. How the Report of Concern Will be Handled

The action taken by ABC in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the ABC Board of Directors shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information -The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.



HILLINGDON
LONDON

Confidential Reporting Policy

- Whistleblowing

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Authorised by: Chief Executive

Effective date: June 2008 Updated June 2013



INVESTOR IN PEOPLE

1. Scope

The policy applies to employees and also contractors working for the Council on Council premises. It also covers suppliers and those providing services under a contract with the Council in their own premises.

2. Purpose

The purpose of this policy is to encourage employees and others to feel confident in raising serious concerns by providing clear avenues through which those concerns can be raised and reassuring those who raise concerns that they will not be victimised if they have a reasonable belief and the disclosure was made in the public interest.

The policy will ensure that staff and others who raise concerns receive a response and are informed about how their concerns are being dealt with.

3. Policy

All employees at one time or another may have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice, health and safety risks to the public or to other employees, damage to the environment, possible fraud or corruption, sexual or physical abuse of clients, or any other unethical conduct, it can be difficult to know what to do.

Employees may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling it's none of their business or that it's only a suspicion. They may feel that raising the matter would be disloyal to colleagues, managers or to the Council. They may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. They may also fear harassment or victimisation.

The Council is committed to the highest possible standards of openness, probity and accountability. It expects its employees who have serious concerns about anything that is happening in the Council, to come forward and raise those concerns. The Council, however, recognises that employees need to be supported and have confidence that any concerns will be treated appropriately. The purpose of this Policy is to enable employees to raise concerns about such malpractice at an early stage and in the right way. The Council would rather matters were raised when just a concern rather than wait for proof.

This Policy is primarily for concerns where the interests of others or of the organisation itself are at risk.

Employees with concerns about their employment with the Council should raise these through the Grievance Procedure.

The message for employees is 'If in doubt - raise it!'

4. Procedure

Safeguards

1. The Council is committed to good practice and high standards and wants to be supportive of employees. The Council recognises that the decision to report a concern can be a difficult one to make. If you raise a genuine concern under this policy, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.
2. The Council will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in the public interest.
3. Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.
4. All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.
5. You should, whenever possible, put your name to your allegation as concerns expressed anonymously are much less powerful. The Council will exercise discretion in considering anonymous allegations if the issue raised is sufficiently serious, e.g. involving individual or public safety or corruption, waste or other impropriety, and credible and there is a likelihood of confirming the allegation from other sources.
6. If you make an allegation in the public interest but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

How to raise a concern

7. It is normally expected that concerns will be raised in the first instance with the immediate line manager or Head of Service. However if the matter is of an extremely sensitive or serious nature or management is believed to be involved it can be raised with the following: -
 - Head of Internal Audit and Corporate Governance. 01895 556132 (Ext: 6132)
 - Monitoring Officer, 01895 250617 (Ext: 0617)
 - Director of Finance and Resources, 01895 556071 (Ext: 6071)
 - Chief Executive, 01895 250569 (Ext: 0569)
 - Head of Democratic Services, 01895 250636 (Ext: 0636)
 - External Audit, 01895 250571 (Ext: 0571)

Concerns can also be addressed to the confidential hotline number on 0800 389 8313 or e-mailed to: fraudandcorruptionhotline@hillingdon.gov.uk

8. The above will also be able to provide advice/guidance on how to pursue matters of concern.
9. Concerns may be raised verbally or in writing. To make a written report it is suggested that the background and history of the concern with relevant dates is included and the reason for the particular concerns about the situation.
10. Reasonable grounds for concern will need to be demonstrated.
11. Employees may be accompanied at any meetings or interviews in connection with concerns raised by a companion.

How the Council will respond

12. Once you have raised your concern, it will be looked into to assess initially what action should be taken.
13. As appropriate, matters raised may:
 - be investigated by management, the Monitoring Officer, internal audit, through the disciplinary process or referred for investigation through the Council's Standards Committee where the complaint is about the misconduct of Councillors.
 - be referred to the police
 - be referred to the external auditor
 - form the subject of an independent investigation.
14. In deciding how to deal with the concern raised, the overriding principle the Council will have in mind is the public interest. Concerns or allegations that fall within the scope of specific procedures e.g. child protection, will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.
15. Within ten working days of a concern being raised, the person to whom the concern has been raised will acknowledge receipt in writing and indicate how the Council proposes to deal with the matter. If there is an ongoing investigation the person responsible for that investigation will provide updates on how the matter is progressing and inform the outcome of the investigation subject to any legal constraints.
16. The Council will take steps to minimise any difficulties that may be experienced as a result of raising a concern. For instance, if required to give evidence in criminal or disciplinary proceedings, the Council will arrange for advice about the procedure and any support and counselling required.

The Responsible Officer

The Monitoring Officer has overall responsibility for the maintenance and operation of this policy. That officer maintains a record of concerns raised and the outcomes, in a form, which does not endanger confidentiality, and will report as necessary to the Council.

External contacts

While the Council hopes this policy gives the reassurance needed to raise such matters internally, it recognises that there may be circumstances where matters can properly be reported outside bodies, such as the District Auditor or the police. The Union or Citizens Advice Bureau will be able to advise on such an option and on the circumstances in which to contact an outside body safely.

Information on OFSTED's whistle blowing hotline is at www.ofsted.gov.uk/contact-us/whistleblower-hotline



Longthorpe
Primary School

**Confidential Reporting
(Whistle Blowing)
Policy
(A Peterborough City Council Policy Document)**

Date of Completion: January 2011

Date of Next Review: January 2014



1.0 SCOPE

This policy applies to all employees and those contractors working for the Council on Council premises, e.g. agency staff, builders, etc. This policy is in addition to the Council's Complaints Procedure, Grievance Procedure, Dignity at Work Procedure, Code of Conduct, Member Standards Panel and other statutory reporting procedures which may apply within some departments of the Authority.

The use of this Policy will not directly result in disciplinary sanctions being imposed on employees, however a concern raised through the Policy may lead to the matter being dealt with via the disciplinary or another agreed procedure.

2.0 PURPOSE

Peterborough City Council is committed to tackling fraud, abuse and other forms of malpractice and, therefore, the Council has introduced this procedure to enable employees to raise their concerns about such malpractice at an early stage and in the correct way.

The Public Interest Disclosure Act 1998, confers a right on employees not to be victimised or suffer detriment as a result of a disclosure in good faith of particular types of information, e.g. relating to criminal or illegal activity, to a defined person such as the employer or the Audit Commission. In order to be protected the information needs to be disclosed in accordance with the Act.

3.0 BACKGROUND

The Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment employees and others with serious concerns about any aspect of the Council's work are encouraged to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis.

Employees are often the first to realise that there may be something wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Council. They may also fear harassment or victimisation. In these circumstances, it may appear to be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

This policy document makes it clear that employees can and should voice their concerns on any aspects of the Council's work without fear of victimisation, subsequent discrimination or disadvantage. It is intended to encourage, enable, and require employees to raise serious concerns within the Council rather than overlooking a problem or blowing the whistle outside.

4.0 AIMS OF THE POLICY

This policy aims to:

- encourage employees to feel confident in raising serious concerns and to question and act upon any concerns about Council practices;
- provide avenues for employees to raise these concerns internally and receive feedback on any action taken;
- ensure that all concerns are taken seriously;
- deal consistently with disclosures in a fair, objective and discrete manner.
- ensure that the Council continues to improve its services and operate best practices.

- reassures employees that they will be protected from victimisation, subsequent discrimination or disadvantage for whistleblowing in good faith;
- allow employees to take the matter further if they are dissatisfied with the Council's response.

Major concerns may include:-

- physical, sexual, or emotional abuse of a child or any other person by another employee or any other person.
- inappropriate use of grants;
- tampering with tender documents to advantage a particular party;
- manipulation of accounting records and finances, including fraudulent claims;
- decision making for personal gain;
- infringement of service users' personal, human and basic rights e.g. abuse (physical, emotional, sexual), harassment, bullying and prejudice.
- inappropriate use of Council assets;
- deceit, within Council practices;
- abuse of position within the Council.
- health and safety of employees or service users.

Concerns which fall within the scope of the whistleblowing procedure may also be about something that:

- is potentially unlawful; or
- is against the Council's Standing Order or policies; or
- falls below established standards or practice; or
- amounts to improper conduct.

Before initiating the procedure employees should consider the following:

- that responsibility for expressing concerns about unacceptable practice or behaviour rests with all employees;
- that employees should use supervision sessions, team meetings and other opportunities to raise questions and seek clarification on issues which are of concern;
- that it can be difficult to raise concerns about the practice or behaviour of a colleague, but employees must act to prevent an escalation of the problem and to prevent themselves being potentially implicated.

All City Council employees have the right to raise concerns, which could be about the actions of other employees, private contractors and/or elected members.

5.0 SAFEGUARDS

For Employees Raising the Concern

The decision to report malpractice can be a difficult one for an employee, who may possibly fear subsequent victimisation or harassment. No action will be taken against an employee who has raised a concern in good faith, even if that concern is seen to be unfounded after investigation.

This does not, however, mean that if an employee is already the subject of disciplinary or redundancy procedures, that these procedures will be halted as a result of that employee whistleblowing.

Victimisation or harassment of an employee who has raised a concern in good faith, or any other attempt at reprisal either by an employee whose conduct is the subject of investigation or others, will be considered a disciplinary offence.

Confidentiality

The Council will do its best to protect an employee's identity when they raise a concern and do not want their name to be disclosed. However, it must be understood that should the concern raised need to be addressed through another procedure, e.g. disciplinary procedure, the employee may be asked to provide a signed statement as part of the evidence, thus revealing their identity. Failure to provide such a statement may mean that further action cannot be taken by the Council to address the concern. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss with you whether and how we can proceed.

Anonymous Allegations

Employees are encouraged to put their name to an allegation.

Any allegation, including those received anonymously relating to the well being and welfare of children will be investigated.

Concerns expressed anonymously are much less powerful and are not so likely to be effective, but they will be considered at the discretion of the Council. In exercising this discretion, the following factors which will be taken into account would include:

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

Untrue Allegations/Defamation

Whistleblowers making untrue allegations may expose themselves to actions for libel or slander which together make up the civil wrong of defamation. This is a complex area of law. In essence a person puts themselves at risk of being sued for damages if, without justification, they publish or communicate a false statement about someone which may injure his or her reputation in the eyes of ordinary members of society.

However, a whistleblower will not generally be liable provided that they had a legal moral or social duty or interest in making the statement to a person with a similar interest. Advice on this is available from the Head of Legal Services.

Malicious/Vexatious Allegations

If an allegation is made or a concern is raised in good faith, no action will be taken against the employee raising the concern. However, malicious, or vexatious allegations, or disclosures

made for personal gain will be considered as disciplinary offences and are likely to result in disciplinary action being taken against the employee raising the concern.

Unfounded Allegations

Following investigation, allegations may be confirmed as unfounded. The employee who raised the concern, will be notified of this decision and informed that the Council deems the matter to be concluded and that it should not be raised again unless new evidence becomes available.

In respect of an unfounded allegation, all documents accumulated through the investigation process will be held separately from any individual employee's personnel file, and destroyed after a reasonable period of time. Except in the circumstances of the retention of necessary documents in respect of Child Protection issues, in which case they will be held on file as required by the relevant legislation, without precluding an individual employee's statutory rights.

Support to Employees

It is recognised that raising concerns can be difficult and stressful. Advice and support is available via an employee's line manager, Departmental Human Resources Adviser or Trade Union representative. It must be recognised that employees who are subject to investigation following concerns being raised will also be entitled to support from the same sources, although not from the same individuals.

Vested Interest

Any person who is the subject of complaint will not be involved in the handling of the complaint.

PROCEDURE FOR HOW TO RAISE A CONCERN

As a first step, an employee should normally raise concerns with their immediate manager or their manager's superior. This depends, however, on the seriousness and sensitivity of the issues and who is involved. For example, if an employee believes that management is involved, they could approach their Director, the Director of Strategic Resources (as the Chief Finance Officer), Head of Legal & Democratic Services (as the Monitoring Officer), Internal Audit Manager, Chief Executive, or the Head of Operational Human Resources.

Any employee who suspects that a child (or unborn child) is suffering significant harm or may be at risk of suffering significant harm or that a child or young person has abused another child/young person should report their concerns and seek advice from the Referral & Assessment Team of Children's Services at Laxton House, NSPCC or the Police.

Concerns are better raised in writing. An employee is invited to set out the background and history of the concerns, giving relevant names, dates and places where possible, and the reasons why they are particularly concerned about the situation.

If an employee does not feel able to put their concern in writing, they can telephone or meet the appropriate officer to whom they decide to report. It is important that, however the concern is raised the employee makes it clear that they are raising the issues via the whistleblowing procedure.

Although an employee is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.

Advice and guidance on how matters of concern may be pursued can be obtained from:

- Chief Executive
- Director of Strategic Resources
- Head of Legal & Democratic Services
- Internal Audit Manager
- Head of Operational Human Resources

In some instances it may be appropriate for an employee to ask their trade union to raise a matter on their behalf or to ask a colleague or trade union representative to accompany them when they commence the procedure.

The Head of Legal & Democratic Services is the Council's Monitoring Officer. The Monitoring Officer is a statutory whistleblower and is under a duty to present a report to Council if it appears to them that an action or proposal is, or is likely to be unlawful or which is likely to amount to maladministration.

The Director of Strategic Resources is responsible for the Council's financial affairs and is under a similar duty to whistleblow in relation to unlawful expenditure and illegal accounting practices.

6.0 HOW THE COUNCIL WILL RESPOND

The action taken by the Council will depend on the nature of the concern. The matters raised may:

- be investigated internally;
- be referred to the Police;
- be referred to the External Auditor;
- form the subject of an independent inquiry.

(All issues will be referred to the Head of Legal & Democratic Services for record keeping purposes).

In order to protect individuals and the Council, initial enquiries, (usually involving a meeting with the individual raising the concern), will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the Council will have in mind is the public interest. Concerns or allegations that raise issues that fall within the scope of specific procedures, (e.g. child protection or discrimination issues), will normally be referred for consideration under those procedures.

Some concerns may be resolved simply, by agreed action or an explanation regarding the concern, without the need for further investigation.

Within ten working days of a concern being received, the person receiving the concern will write to the employees acknowledging that the concern has been received and;
indicating how they propose to deal with the matter;

- advising whether any initial enquiries have been made;
- advising whether further investigations will take place, and if not why not;
- when possible giving an estimation of how long it will take to provide a final response;

It may be necessary for the person receiving the concern to meet with the employee on more than one occasion depending on the nature of the concerns raised.

Where any meeting is arranged, employees, if they wish, may be accompanied by a colleague or recognised Trade Union Representative.

When appropriate, meetings will be arranged away from the workplace.

7.0 THE RESPONSIBLE OFFICER

The Head of Legal & Democratic Services has overall responsibility for the maintenance and operation of this policy and will maintain a record of any concerns raised and the outcomes, but in a form that does not endanger an employees confidentiality.

8.0 HOW THE MATTER CAN BE TAKEN FORWARD

This policy is intended to provide employees with a procedure for raising concerns and resolving these within the Council. You have a duty to raise any issues of concern. If you have any difficulty in raising an issue with your line manager or that no action appears to have been taken on your concerns, at that point there are other routes that you may take.

- Concerns regarding theft, fraud and misappropriation of funds may be raised with either the Internal Audit Manager (telephone no. 01733 746094) or the Director of Strategic Resources (telephone no. 01733 452398).
- Concerns regarding abuse of position, harassment etc. may be raised with the Head of Operational Human Resources (telephone no. 01733 742030) or your departmental HR Adviser.
- Concerns about the legality of another employee's actions may be raised with the Head of Legal & Democratic Services (telephone no. 01733 452484).
- Concerns about the safety and well being of children and vulnerable adults may be raised either with the Director of Adult Social Care (telephone no. 01733 748480), Director of Children's Services (telephone no. 01733 748000) or the Head of Legal & Democratic Services (telephone no. 01733 452484).

4.2 If an employee is not satisfied with the Council's response, as a last resort they may wish to raise the matter externally with:

- 'Public Concern at Work' * on 020 7404 6609;
- District Audit
- a recognised trade union;
- relevant professional bodies or regulatory organisation;
- Police;
- voluntary organisation;
- a solicitor; or
- the Local Government Ombudsman.

If an employee does choose to take a concern outside the Council it is their responsibility to ensure that confidential information is not handed over, i.e. confidential information, in whatever format, must not be handed over to a third party. If clarification is required on this, the advice of the Director of Strategic Resources or Head of Legal & Democratic Services should be taken.

9.0 MONITORING AND REVIEW

The Head of Legal & Democratic Services in conjunction with the Head of Operational Human Resources will be responsible for monitoring the implementation and effectiveness of this policy/procedure.

The Head of Legal & Democratic Services and the Head of Operational Human Resources will submit an annual monitoring report to Directors Group.

The policy/procedure will be reviewed and its effectiveness evaluated regularly in the light of issues raised or identified as part of the monitoring process. Revisions to the policy/procedure will be made by Members at Employment Committee following agreement between Directors Group and the recognised Trade Unions.

**** Public Concern at Work is a registered charity that employees can contact for advice to assist them in raising concerns about poor practice at work. The charity also provides advice to employers as to the possible ways to address these concerns.***