

No.	Priority	Recommendation	Response
1	High	<p>The Council needs to create a more open, transparent and safe culture that will encourage all employees and members of the public to raise concerns and speak out. It should develop a culture of shared learning and practice. This could be achieved by:</p> <p>(1) adopting a whistleblowing/raising a concern charter; (2) renaming the policy to 'raising or reporting a concern', similar to the NHS (whistleblowing often has negative connotations); (3) demonstrating to employees that action is taken in an effective and efficient manner, including against vexatious concerns; (4) public recognition on a regular basis, including the improvements made as a result of investigations; (5) introducing officer, member and Mayoral performance reporting, focusing on the improvements and changes made to support a no blame culture; (6) promoting the role of the charity Public Concern at Work to provide advice and help; and (7) actively supporting whistleblowers by appointing mentors and guardians.</p>	<p>(1) We have a whistleblowing policy in place and it has been strengthened following the comments from the review incorporating a revised Policy and Procedure for adoption;</p> <p>(2) It has been agreed to continue with the name as Whistleblowing for the policy.</p> <p>(3) The policy incorporates in Part 3.2 reference to the vexatious allegations and may be construed as gross misconduct.</p> <p>(4) , (5) Agreed. The policy will be reviewed annually by the Monitoring Officer and the policy and monitoring will be taken to Audit Committee;</p> <p>(6) highlighted in 7.4 and will continued to be monitored as part of the wider monitoring under the Audit Committee.</p> <p>(7) Agreed if individual requires</p>
2	High	<p>The council should develop a culture of shared learning and reflective practice, where evaluation without attributing blame becomes common practice.</p>	<p>By reporting to Audit Committee and regular monitoring and highlighting areas of good practice and improvements this aspect will be part of the process.</p> <p>If the MO will report matters of shared learning and practices with CLT on as when basis.</p>
3	Medium	<p>Settlement agreements should clearly state that the confidentiality agreement does not preclude a worker from making a protected</p>	<p>We will continue to have any Settlement Agreement legally compliant with the law. The Agreement the council has is fit</p>

		<p>disclosure.</p> <p>The Council should obtain legal advice and reconsider precluding employees within a settlement agreement from being able to make a claim in a tribunal in relation to a protected disclosure under the Public Interest Disclosure Act.</p>	<p>for purpose and specifically asks for details of any additional matters of concern.</p>
4	High	<p>The Council should publicise and raise awareness of its whistleblowing policy and procedures, and should do this through a range of methods to ensure all employees are informed, including those without intranet access. This could be achieved by:</p> <ul style="list-style-type: none"> (1) including whistleblowing arrangements as part of an employee induction process; (2) re-launching the policy; (3) introducing mandatory training; (4) utilising new communication methods, such as plasma screens, the weekly newsletter from the chief executive, team talks and social media; (5) ensuring those staff not online can access the whistleblowing policy; and (6) monitoring levels of awareness. 	<p>The redraft policy and procedure will be relaunched to ensure that all officers are aware. It will form part of the induction for new employees and training will be provided. Comms are being engaged and screens will be used and other forms of communications.</p>
5	Medium	<p>Consider updating/changing the whistleblowing policy and procedures:</p> <ul style="list-style-type: none"> (1) consider if the policy should remain applicable to the public and ensure that policy and procedures are improved so that members of the public are clear on how they can raise a concern; (2) set out who has overall responsibility, consider including a section on roles and responsibilities for Members, officers and committees; (3) ensure the role of the line manager is defined and clear throughout the process; 	<ul style="list-style-type: none"> (1) The updated Policy will be applicable to employees. The Council's complaints procedure continues to be used widely by members of the public to raise all concerns including public interest concerns; (2) Agreed. (3) Agreed (4) Agreed

		<p>(4) extend the scope to make applicable to contractors, temporary staff and volunteers;</p> <p>(5) include safeguarding examples and refer to the relevant safeguarding policy and procedures;</p> <p>(6) actively encourage whistleblowing and reporting;</p> <p>(7) ensure that informal as well as formal structures and procedures are in place to address the range of severity of concerns it might receive; and</p> <p>(8) regularly review the policy to ensure advice lines and telephone numbers are up to date.</p>	<p>(5) "our assurances to you" in the whistleblowing policy details the procedures the Council should be following when safeguarding employees;</p> <p>(6) Agreed;</p> <p>(7) Work is underway to address this ;</p> <p>(8) Agreed. The Policy will be reviewed annually.</p>
6	Medium	<p>The Council should improve the whistleblowing procedures in operation. It should:</p> <p>(1) record where a concern originates, both by the Monitoring Officer and the Department which first receives a concern;</p> <p>(2) improve the effectiveness of its internal hotline, advertise the opening times of the hotline and ensure an answer service is provided or consider using an external hotline;</p> <p>(3) agree at what stages the whistleblower will be informed, by whom and if these targets are not met and what action the Council will implement.</p>	<p>(1) Agreed in accordance with Data Protection Act regarding the processing of personal data;</p> <p>(2) There is no whistleblowing hotline or an intention to have such. There are hotlines with the Corporate Fraud Team relating to specific fraud functions</p> <p>(3) A timeline is given as to when the whistleblower will be informed of the outcome.</p>
7	High	<p>The role of Elected Members and committee responsibilities should be clarified:</p> <p>(1) the Council should establish which Committee is responsible for whistleblowing (usually the committee charged with governance, the Audit Committee). This committee should assess the effectiveness of the policy as well as ensuring ownership and monitoring implementation of the policy;</p> <p>(2) the annual reporting to Overview and Scrutiny should be formalised, to include numbers of disclosures, action taken, what has changed as a result and key lessons learnt; and</p>	<p>Work in progress</p> <p>The revised policy establishes that the Audit Committee is responsible for whistleblowing;</p>

		<p>(3) all political groups to be encouraged to promote the policy within their group membership.</p> <p>The arrangements for reporting to Members should be clarified and made clear to Members so they can effectively hold officers to account and effectively scrutinise as required.</p>	
8	Medium	<p>Ensure members:</p> <p>(1) code of conduct includes reference to the whistleblowing policy;</p> <p>(2) are clear how the whistleblowing policy is different to other HR type policies; and</p> <p>(3) are encouraged to use the current procedures so that performance data on use of the policy is up to date and accurate.</p>	<p>Whistleblowing is contained in the Codes and Protocols of the constitution which is being reviewed and members are trained on the codes.</p>
9	High	<p>The Council should consider how those charged with governance (Members and officers) are made aware of whistleblowing concerns, where they originate. The volume of safeguarding allegations may indicate that this information should only be required for allegations raised by employees.</p>	<p>The procedure details how an employee should raise a concern (with their line manager unless not appropriate in the circumstances). The MO will oversee all complaints and address trends at CLT and/or direct with CD's.</p>
10	Medium	<p>The Council should ensure that those employees who have sight of and are involved in whistleblowing allegations, from health and safety to safeguarding are aware of their duty to ensure the information as a matter of routine remains confidential and they understand the protection that those raising a concern are entitled to.</p>	<p>Confidentiality is maintained as far as possible - see clause 7 of the policy.</p>
11	Medium	<p>The Council should consider if a case management system should be introduced for the corporate whistleblowing concerns.</p>	<p>Agreed</p>
12	Medium	<p>The Council should confirm if the existing anti-fraud investigation procedures are appropriate for whistleblowing and ensure they are consistently applied across the Council. They should set out who is able to complete an investigation, ensuring that investigations are</p>	<p>Agreed.</p>

		completed by those with the necessary skills.	
13	Medium	<p>The Council needs to decide what fraud prevention and detection expertise and skills are required and the cost effectiveness of the service. It should:</p> <p>(1) Consider what skills and expertise are lacking and that may need to be obtained externally such as digital forensics;</p> <p>(2) have clear terms of reference to avoid an investigation losing direction, irrelevant lines of enquiry being pursued and unnecessary time and money being incurred;</p> <p>(3) record all concerns received in a clear and consistent way using a standardised report.</p>	Guidance is to be provided to investigators
14	Medium	The Council should examine the circumstances and conditions which allowed the incident to occur, ensuring lessons are learnt and action taken as a result.	The procedure and policy provides that outcomes are examined and that lessons are learnt.
15	Medium	Training should be provided for those responsible for investigating whistleblowing cases.	Agreed
16	Medium	<p>Training for Members should include:</p> <p>(1) sessions on use of the policy and its procedures; and</p> <p>(2) Members roles and responsibilities both within the Council's committee structure and sitting on Boards and Committees outside of the Council.</p>	Agreed
17	Medium	The Council should develop effective performance monitoring and reporting and to do this should record the themes, trends and outcomes across the Council. This information should be reported to CLT and Members, as clarified in recommendation 7.	The redrafted policy and procedure addresses this