

Audit Committee

07 November 2019



Title	Review of the Confidential Reporting Code (Whistleblowing Policy)		
Purpose of the report	To note and/or to make a recommendation to Council		
Report Author	Michael Graham, Monitoring Officer		
Cabinet Member	Councillor Tony Harman	Confidential	No
Corporate Priority	This item is not in the current list of Corporate priorities		
Recommendations	The Audit Committee is asked to note the assessment of the Council's current whistleblowing arrangements and agree any changes it deems appropriate for recommendation to Council.		
Reason for Recommendation	To demonstrate that the Council is committed to the highest possible standards of openness, probity and accountability. To encourage and enable all staff to raise any serious concerns they have, within the Council.		

1. Key issues

- 1.1 The Confidential Reporting Code forms part of the Council's Constitution and sets out how to raise serious concerns about any aspect of the Council's work. It also sets out legal protection against reprisals under the Public Interest Disclosure Act. The Code is attached as **Appendix 1**.
- 1.2 A poster is displayed on staff noticeboards explaining the types of concerns that staff should speak up about and who they can raise these with, both internally and externally. (Attached as **Appendix 2**).

2. Options analysis and proposal

- 2.1 The Audit Committee is required to review the Code annually.
- 2.2 The Code details:
 - (a) The nature of concerns which may be reported. (Section 2)
 - (b) Other policies such as the Grievance Procedure which exist to deal with employment issues including bullying or harassment. (Section 2)
 - (c) Safeguards against harassment or victimisation as a result of raising a concern. (Section 3)
 - (d) Processes for raising and dealing with concerns including the various officers and organisations who could be contacted. (Sections 7 to 10)

2.3 In order to facilitate this year's review, officers have used a benchmarking tool to help evaluate the Code against three core elements which are central to a successful whistleblowing programme. These elements are:

Governance: Accountability, Written Policy and Procedures, Review and Reporting

Engagement: Communications and Training

Operations: Support and Protection, Recording and Investigations, and Resolution and Feedback.

2.4 Within each of the elements above, the tool suggests a set of standards to aim for, on a scale ranging from 0-3. Officers have identified where we believe our Code and whistleblowing processes measure against these standards and provided a narrative on the evidence we have relied upon to satisfy ourselves that the score is accurate. The results of the benchmarking exercise are detailed in **Appendix 3**.

2.5 In undertaking this exercise, it is recognised that some areas of the Code can be improved upon. Where this is relevant, a suggestion for improvement has been proposed for the Committee to consider.

2.6 It is relevant to note that this benchmarking tool is designed to be used by a wide range of organisations, from small local authorities to large private sector firms operating internationally. Some of the higher scoring standards may therefore not be appropriate for a Council of our size.

3. Financial implications

3.1 Not applicable.

4. Other considerations

4.1 There are none.

5. Timetable for implementation

5.1 If Audit Committee agrees that changes to the Policy are required, these will be recommended to a future Council for approval.

Background papers: [Protect 360 – Benchmarking for whistleblowing arrangements](#)

Appendices:

Appendix 1 – Confidential Reporting Code

Appendix 2 – Poster displayed on notice boards

Appendix 3 - Evaluation of Policy against benchmarking tool