

COUNCIL

15 APRIL 2010

WHISTLEBLOWING POLICY

Report from: Tricia Palmer, Assistant Director, Organisational Services

Author: Sandra Steel, Employee Services Manager

Summary

The report seeks agreement to review and replace the current Whistleblowing Policy.

1. Budget and Policy Framework

- 1.1 It is proposed that the Whistleblowing Policy, once agreed, will form part of the Council's Constitution. Therefore, this is a matter for Council.

2. Background

- 2.1 The Council has a Whistleblowing Policy (approved in June 1999), to enable concerns to be raised about the unethical conduct of officers and members on various matters including issues relating to fraud, corruption and malpractice. The policy provides a mechanism for employees to raise their concerns internally whilst being protected under the Public Interest Disclosure Act 1998. It also provides for concerns to be raised outside of the council.
- 2.2 Following consideration at Audit Committee in December 2009, the policy was the subject of consultation and was subsequently considered by the Employment Matters Committee in March 2010. Following this, the policy is now referred to Council for approval and inclusion within the Council's Constitution. The revised Whistleblowing Policy is attached at appendix one to the report.
- 2.3 The current Whistleblowing Policy was launched in August 2000 and re-launched in 2006 following an internal audit inspection.
- 2.4 On 17 December 2009 the Monitoring Officer presented a revised draft Whistleblowing Policy to the Audit Committee, and the Committee made the following comments as part of the policy's development:

Section 8 - Misuse of the Whistleblowing Policy

The need to ensure sufficient safeguards are in place for staff raising concerns in good faith (as set out in section 1 of the policy), who will not know whether these concerns may be deemed as unreasonable at a later stage and therefore subject to disciplinary action. Members requested that section be revised, in particular the removal of the word "unreasonably".

Section 9 - Who can concerns be raised about?

The potential difficulty for school based staff if it is inappropriate/difficult for them to raise a concern with the Headteacher or Chair of Governors. Consideration is therefore needed as to who these staff can escalate issues to in these circumstances.

Sections 14 - Taking your concern further and 15 - Contacting the media

Whilst the early involvement of Councillors was viewed by the Committee as inappropriate it was considered appropriate for Councillors to be contacted after all the other channels had been exhausted (as set out in section 14), Councillors could then discuss the concern with the Chief Executive. Raising the matter with a Councillor could be incorporated within section 15 of the policy.

- 2.5 The above recommendations have been considered and changes made with the exception of the third recommendation suggesting that an employee should be able to take their concern to a Member should all other channels be exhausted.
- 2.6 It is recommended that this suggestion not be adopted as it is not considered to be good practice to allow whistleblowers to go to Members in this way. South East Employers undertook research on the council's behalf with other local authorities within the area and the result was that no other council has built this into their Whistleblowing Policy.
- 2.7 It is considered that the revised policy is a robust document allowing a variety of channels for employees to raise a concern and who they should contact if they wish to take their concern further.

3. Advice and analysis

- 3.1 The revised Whistleblowing Policy builds on the council's existing policy, with the following revisions:
- emphasises the importance of raising concerns internally in accordance with the Council's Whistleblowing Policy;
 - identifies the forms of conduct which will be investigated under the Whistleblowing Policy;
 - identifies the individuals protected under the Whistleblowing Policy;

- Identifies specialist teams and nominated Whistleblowing Officers to investigate concerns;
- identifies the conditions necessary for raising a concern direct to the Media and emphasises that premature contact with the Media may be a disciplinary matter under the Council's Disciplinary Procedure;
- informs individuals that all whistleblowing cases (anonymised information) shall be reported to the Audit committee annually.

4. Consultation

4.1 The revised Whistleblowing Policy has been consulted upon with:

- The trade unions and teaching associations;
- Service Managers who have volunteered to take part in the consultation process for new employment policies;
- The Black Workers Forum;
- The Disabled Workers Forum;
- The Lesbian, Gay, Bisexual and Trans Forum;
- The Corporate Communications Group;
- Legal Services;
- Audit Committee;
- Corporate Finance.

4.2 Feedback from consultation included a requirement to:

- highlight contact details for the regulatory bodies;
- ensure that the Whistleblowing Policy concurs with the Council's Constitution in terms of contacting Members and the media;
- ensure school based staff are aware of who to contact should they feel unable to approach the Headteacher or Chair of the Governing Body;
- clarify within the document that the Chief Finance Officer needs to be informed of all fraudulent matters and will decide on any subsequent appropriate action.

4.3 Recommendations for amendment have been taken on board where it was considered appropriate to do so.

4.4 A Diversity Impact Assessment (DIA) screening was undertaken (see appendix two) and it is noted that it is not necessary to undertake a full impact assessment.

5. Risk Management

- 5.1 The Whistleblowing Policy sets out the Council's commitment to tackling unlawful acts including fraud, corruption, unethical conduct and malpractice. The Whistleblowing policy encourages all individuals to raise serious concerns about practices by the Council.

6. Employment Matters Committee – 1 April 2010

- 6.1 The Employment Matters Committee considered this report on 1 April 2010 and discussed a number of issues including the recommendations from the Audit Committee on 17 December 2009 with particular reference to whether it was appropriate to contact Councillors under this policy as a last resort. The Committee discussed whether Trades Unions and the Council's Equalities Forums could be added to section 10 of the policy (How to raise a concern) and whether section 16 of the policy (Responsible officer) could be re-worded to reflect that all uses of the policy be reported to the Audit Committee. The Committee also discussed whether all formal whistleblowing complaints be recorded (including those concerns taken to the Line Manager).

- 6.2 The Committee recommended to Council approval of the Whistleblowing Policy subject to the Policy being amended to reflect that all formal whistleblowing complaints being recorded.

Assistant Director's comments

- 6.3 The policy has been amended to reflect the Committee's comments with regards to sections 10 and 16 and the Committee's recommendation (section 13), and these are set out as tracked changes in the policy and is subject to Council approval.

7. Financial and legal implications

- 7.1 The Public Interest Disclosure Act 1998 protects a worker from victimisation/detriment following a disclosure made in accordance with the provisions of the act. This policy has been developed in line with the provisions of the Public Interest Disclosure Act 1998. A written policy is indicative of good corporate governance practice. The policy also gives the council an opportunity to give prominence to the issue and to express its commitment to the legal protection afforded to whistle-blowers.

- 7.2 There are no direct financial implications arising from this report.

8. Recommendation

- 8.1 The Council is asked to agree the Whistleblowing Policy as set out at appendix 1 to the report.

Lead officer contact

Sandra Steel, Employee Services Manager, HR Services
Sandra.steel@medway.gov.uk
Tel 01634 334083

Background Papers:

The Council's Constitution
Report and Minutes to Audit Committee: Whistleblowing Policy and Report on
Instances April 2008 - April 2009– 17 December 2009

**Draft
Whistleblowing Policy**

1. Introduction

The Council is committed to tackling unlawful acts including fraud, corruption, unethical conduct and malpractice regardless of who commits them, or where in the Council they are committed. In this way the Council ensures that its services are used in the best interests of the local community.

The Council aims to ensure that anyone wishing to raise a concern feels confident in the process under this Policy. This policy is designed to allow you to raise a concern without fear of reprisals or victimisation, if your disclosure is made in good faith.

To encourage and enable you to do this the Council will ensure that anyone who uses this policy to raise a concern will be protected from any form of detriment, harassment or victimisation regardless of :

- a) The content of the concern you raise
- b) With whom you raise the concern and
- c) Whatever the outcome of raising the concern.

The Whistleblowing Policy provides an opportunity for your concern to be dealt with internally, after all that is where the solutions will be found, or through an agreed external body.

There is always a temptation to take a concern directly to the media, but this does not necessarily mean that the issues raised are appropriately addressed and often fails to protect innocent parties. You should remember that you have a duty of confidence to your employer and that unauthorised disclosure of information maybe a disciplinary offence. Please refer to paragraph 15 below.

The best advice before you decide on what action to take is to seek the advice of one of the specialist Whistleblowing teams.

2. What is covered by Whistleblowing?

A concern can relate to any unethical or unprofessional conduct within the Council, including malpractice, and abuse. The policy not only covers acts that have actually occurred but also potentially unethical or unprofessional conduct.

The person making the disclosure must do so in the reasonable belief that it shows one or more of the following:

- A criminal offence has been committed, is being committed, or is likely to be committed;
- A person has failed, is failing, or is likely to fail to comply with any legal obligation to which she/he is subject;

- A miscarriage of justice has occurred, is occurring, or is likely to occur;
- Acts or potential acts of fraud and corruption or the misuse of public funds
- The health & safety of any individual (employee or member of the public) has been, is being, or is likely to be endangered;
- The environment has been, is being or is likely to be damaged
- Actual or potential acts of all forms of discrimination;
- the actual or possible abuse (sexual or physical) of clients in the Council's care
- Actual or potential acts of harassment or bullying of, or by, someone working for the Council,
- Any unethical conduct that causes concern or brings the reputation of the Council into disrepute or,
- The deliberate concealment of information that would indicate any of the above.
- Information tending to show any matter falling within any one of these points has been, is being, or is likely to be concealed;

If you are in any doubt as to whether or not to raise a concern then confidential advice can be sought from HR Services or your trade union representative.

Note:- If, when disclosing a concern you commit a criminal offence, for example accepting a bribe and or acts of corruption, you may lose your rights to protection from detriment. Further advice can be sought from one of the specialist teams.

3. Who Is Covered By the Whistleblowing Procedure?

The Public Interest Disclosure Act 1998 will protect workers who disclose information in the correct manner from dismissal or penalisation. "Workers" include individuals who are;

- Employees employed under a contract of employment;
- Employed under any other contract, under which they perform personally any work or services;
- Agency workers; or
- Undertaking work experience as part of a training course.

4. How am I Protected?

Under the Public Interest Disclosure Act, to qualify for protection for disclosure the Worker must:

- Be acting in good faith;
- Have reasonable grounds for believing that the information disclosed indicates the existence of one of the problems itemised in section 2 above

5. Confidentiality

The Council accepts that wherever possible the confidentiality of anyone wishing to raise a concern will be protected. There might however be occasions where your confidentiality cannot be protected, for example, where there is the involvement of the police.

If there is any possibility that your confidentiality cannot be protected you will be told of the reasons and offered appropriate advice and support.

6. Raising a concern

You are encouraged to raise a concern provided that:

- You have reasonable belief that the information you hold, or the allegation is accurate; and
- You make the disclosure in good faith

Under no circumstances should you investigate your concern yourself.

7. Anonymously raised concerns

Concerns expressed anonymously will be investigated on the basis of their merits. However, an investigation may be hampered by the inability to gain further information and the Council would encourage you to provide some method of contacting you to assist in the investigation.

8. Misuse of the whistleblowing policy

Raising a concern with malicious intent or for personal gain or the gain of others is not acceptable and may lead to disciplinary action under the Council's Disciplinary Policy. If in any doubt employees should contact the relevant whistleblowing officer.

9. Who can concerns be raised about?

You can raise a concern about the practice of anyone who undertakes work for, or on behalf of, the Council, including:

- Employees of the Council;
- Contractors;
- Councillors;
- Volunteers; and
- School Based staff.

In a school you would normally raise a concern with your direct line manager. If this was inappropriate then your headteacher or Chair of Governors should be contacted, who may involve the nominated whistleblowing officer. Medway Council has a legal responsibility to deal with any issues raised under the Whistleblowing Policy, regardless of the type of school you work in, be it

controlled, aided or foundation. If it was not appropriate for a school based whistleblower to raise a concern with the headteacher or Chair of Governors then they should contact the Head of Human Resources (Schools).

10. How to raise a concern

No matter with whom you raise your concern it will be dealt with under this procedure. If the person with whom you raise the concern feels it necessary they may want to refer your concern on to either a specialist team or a more senior Council officer, whichever is appropriate. If this is the case you will be contacted first and have the opportunity to discuss any issues this may raise.

As a First Point of Contact

A concern would normally be raised initially with your line manager or supervisor. However this may not always be possible, dependent on the nature of the concern and who is involved.

Alternatively

If you feel unable to raise the matter with your line manager or supervisor you may wish to contact your Director of service or the Director of the service to which your concerns relate (if different). Or

You may wish to refer your concern directly to one of the Council's specialist teams as listed below. Contact details are attached as appendix one.

Specialist Team

Area of speciality

Financial / Audit team Concerns regarding fraud, corruption or misappropriation of Council assets or resources.

Adult and Community Issues

Issues about the care and welfare of adults and community issues e.g. issues concerning the conduct of care staff, housing etc.

Children

Issues relating to the care and welfare of children e.g. the use of school funds (may overlap with the Financial / Audit team)

If it is suspected a child is being neglected or abused by a member of staff, the Local Authority Designated Officer should be contacted.

Human Resources

Concerns relating to the conduct of employees in general and specific issues of discrimination, harassment etc.

Information Technology Concerns relating to the misuse of information technology such as e-mail and the internet.

Regeneration

Concerns relating to environmental issues, eg building control, planning etc

Monitoring Officer Concerns relating to all matters affecting the Council

Trades Unions Concerns relating to all matters affecting the Council

Equalities Forums Concerns relating to all matters affecting the Council (Black Workers Forum (BWF), Disabled Workers Forum (DWF) and Lesbian, Gay, Bisexual and Trans staff (LGBT) Forum).

All the units and service directors have received specialist training in dealing with concerns and will follow the procedure as laid out in this policy.

11. What to consider when expressing a concern

To enable your concerns to be dealt with in a proper and effective manner here are some guidelines for you to consider:-

- Be as clear as possible about what the concern is and to whom and what it relates. You may also want to discuss the concern with others to see if it is shared.
- Be as clear as possible about who maybe involved, when and where actions may have taken place. Please ensure the facts are recorded i.e. record the dates and times in a diary. This way you can be clear about what has actually been heard or seen and when, rather than rely on memory or hearsay.
- Ensure you ask for your concerns to be dealt with under this procedure.

12. The procedure to be followed

To ensure that all concerns raised are taken seriously and are fully investigated the Council has agreed a procedure to be followed in all cases.

If, at any stage of the procedure, you are asked or wish to meet with someone addressing the concerns you have raised you have the option to be accompanied by a work place colleague, trade union representative or representative from a professional body.

When you first raise a concern:

However you wish to express your concern, by telephone or in person, you will:

- Receive an acknowledgement of your concerns within five working days of notifying the investigating person whom you have expressed the concern (this can be sent to your home address);
- The investigating person will then decide how to progress your concern. This may mean undertaking an investigation. This does not mean that the concern is either true or untrue, but will help to assess the gravity of the complaint and establish the facts. It could be possible that concerns raised may be the result of a misunderstanding or an authorised change in practice.

Within ten working days of making your concerns known you will either:-

- i) Have a confidential meeting with the investigating person to further discuss your concerns or
- ii) Have received, in writing, an outline of how the investigating person intends to deal with the concerns raised.

Dependent on the nature of the concerns you may have subsequent meetings with the relevant investigating persons. These can be held “off-site” if preferred.

13. The outcome of your concern

Having raised the concern, the Council recognises that you will need to be assured that the issues have been dealt with correctly. You will be kept informed on a regular basis of what actions are being taken and the final results of any investigations.

In some situations, such as referrals to external bodies, it may not be appropriate (or legally possible) to supply you with the full information discovered. However the reasons for this will be explained at that time. All uses of the whistleblowing policy will be formally recorded and a register maintained.

14. Taking your concern further

If you have exhausted all these channels and you still have concerns, or feel that the issues have not been fully or appropriately addressed, you can contact the Chief Executive, or have him contacted on your behalf, to discuss your concern in confidence.

However you should not refer the matter outside the organisation without first ensuring that all other possible avenues have been exhausted.

Details of regulatory bodies can be found in Appendix two.

15. Contacting the media

If a Worker is considering contacting the Press, they are strongly advised to seek guidance from professional or other representative bodies and to discuss the matter where possible with line and professional managers. If you decide to proceed with contacting the media, you must inform the Chief Executive of the action they-you have taken or are proposing to take.

Disclosures to the media can be made under the law, and will be protected if the following circumstances are met:

- The disclosure is made in good faith
- The employee reasonably believes the information and any allegations are substantially true
- The employee does not act for personal gain

Additionally, one or more of the following conditions must be met:

- The Worker reasonably believes they would be subjected to a detriment if disclosure were made to the employer or prescribed person
- In the absence of an appropriate prescribed person, the Worker reasonably believes a disclosure to their employer would result in the destruction or concealment of information about the wrongdoing
- The Worker has previously disclosed substantially the same information to their employer or prescribed person
- It must be reasonable to make the disclosure

Please be aware that premature contact with the media, where none of the conditions above are met, may result in disciplinary action under the Council's Disciplinary Policy.

16. Responsible Officer

The Chief Finance Officer needs to be informed of all fraudulent matters and will decide on the appropriate action. A report of instances of all uses of this Policy shall be provided to the Audit Committee. This report will not identify any parties using this Policy, but is intended to monitor Whistleblowing procedures.

Whistleblowing Officers

The whistleblowing officers are as follows for issues relating to:

Children – issues relating to the care and welfare of children

Ralph Edwards, Head of HR Services (Schools) Tel (33) 1090

If you suspect a child is being neglected or abused please contact the local authority designated Officer **Clare Wilkes** Tel (33) 1229

Finance/audit – concerns about financial irregularity, fraud or corruption

Richard Humphrey, Audit Services Manager Tel (33) 2355

Adults and Community issues -issues about the care and welfare of adults and community issues

Ashley Davis, Visitor Information Centre Manager Tel (33) 8105

Genette Laws, Social Care Commissioning and Voluntary Sector Manager Tel (33) 1345

Human Resources – concerns about the conduct of employees including harassment, discrimination, bullying etc

Lizzie Hunt, HR Advice and Consultancy Manager Tel (33) 2337

Regeneration – concerns relating to environmental issues, eg building control, planning, green spaces etc

Joy Kirby, Business Quality Assurance Manager Tel (33) 1422

Information Technology – dealing with abuse of information systems, data protection issues, misuse of the internet or e-mail facilities

Moira Bragg, Corporate Projects Manager Tel (33) 2087

Monitoring Officer – concerns relating to all matters affecting the Council

Deborah Upton, Assistant Director, Housing and Corporate Services
Tel (33) 2133

Trades Unions – see:

<http://connections.medway.gov.uk/index/yourcouncil/businesssupport/personnel/29008/29012/30091.htm>

Equalities Forums – see below:

[Black Workers Forum - http://connections.medway.gov.uk/index/yourcouncil/28156.htm](http://connections.medway.gov.uk/index/yourcouncil/28156.htm)

[Disabled Workers Forum - http://connections.medway.gov.uk/index/yourcouncil/31902.htm](http://connections.medway.gov.uk/index/yourcouncil/31902.htm)

[LGBT Forum - http://connections.medway.gov.uk/index/yourcouncil/37021.htm](http://connections.medway.gov.uk/index/yourcouncil/37021.htm)

Regulatory and professional bodies

Health & Safety Executive www.hse.gov.uk
Tel. 0845 345 0055

Care Quality Commission www.cqc.org.uk
Tel. 03000 616161

Health Professions Council (HPC) www.hpc-uk.org
Tel 0800 328 4218

General Social Care Council www.gsccl.org.uk/
Tel 01788 532405

Nursing and Midwifery Council (NMC) www.nmc-uk.org
Tel 0207 333 9333

General Medical Council (GMC) www.gmc-uk.org
Tel 0161 923 6602

Audit Commission www.audit-commission.gov.uk
Tel. 0844 7983131

Local Government Ombudsman www.lgo.org.uk
Tel. 0300 061 0614

Information Commissioner's Office www.ico.gov.uk
Tel. 0303 123 1113

Equality and Human Rights Commission www.equalityhumanrights.com
Tel. 0845 604 6610

Ofsted www.ofsted.gov.uk
Tel. 0300 123 4666

Institution of Civil Engineers <http://www.ice.org.uk/homepage/index.asp>
Tel. 020 7222 7722

Diversity Impact Assessment: Screening Form

Directorate	Name of Function or Policy or Major Service Change		
Business Support Department	Whistleblowing Policy		
Officer responsible for assessment	Date of assessment	New or existing?	
Tricia Palmer, Assistant Director, Organisational Services	25 February 2010	Existing	
Defining what is being assessed			
1. Briefly describe the purpose and objectives	The Whistleblowing Policy provides a mechanism for employees to raise a concern internally about suspected fraud, corruption, unethical conduct and malpractice without fear of reprisals or victimisation. This enables the council to deal with a concern before it has an adverse affect on others or brings the Council into disrepute with the public or the media		
2. Who is intended to benefit, and in what way?	The policy has been introduced to benefit the Council, employees and service users.		
3. What outcomes are wanted?	Desired outcomes: <ul style="list-style-type: none"> - employees using the policy to raise their concerns; - concerns raised internally and dealt with in an efficient and appropriate manner; - minimising the risk of adverse media and/or bringing the council into disrepute. 		
4. What factors/forces could contribute/detract from the outcomes?	Contribute <ul style="list-style-type: none"> - Raising awareness to all staff of the policy and what it means; - Whistleblowing cases being dealt with promptly and appropriately; -Whistleblowing cases being handled internally wherever possible; - Trained Whistleblowing officers. 	Detract <ul style="list-style-type: none"> - employees not understanding the protection afforded to them under this policy and therefore failing to us it; - employees feeling intimidated and in fear of reprisals. 	
5. Who are the main stakeholders?	The council, employees and service users.		
6. Who implements this and who is responsible?	The Assistant Director, Organisational Services		

Assessing impact		
7. Are there concerns that there <u>could</u> be a differential impact due to <i>racial groups</i>?		Brief statement of main issue
	NO	
What evidence exists for this?	The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the Black Workers Forum, Trade Unions, Service Managers and the Corporate Communications group and no concerns were raised in this regard. - does not require a whistleblower to provide details about their race; - explicitly states that acts of discrimination can be reported under this policy.; - will be made available in other languages if requested. 	
8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i>?		Brief statement of main issue
	NO	
What evidence exists for this?	The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the Disabled Workers, Trade Unions, Service Managers, and the Corporate Communications group and no concerns were raised in this regard. - do not require a whistleblower to provide details about their disability; - explicitly states that acts of discrimination can be reported under this policy; - will be accessible in different formats if required. 	
9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i>?		Brief statement of main issue
	NO	
What evidence exists for this?	The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the staff forums, Trade Unions, Service Managers, and the Corporate Communications group and no concerns were raised in this regard - do not require a whistleblower to provide details about their gender; - explicitly states that acts of discrimination can be reported under this policy; 	
10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i>?		Brief statement of main issue
	NO	
What evidence exists for this?	The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the Lesbian, Gay, Bisexual and Trans Forum and no concerns were raised in this regard; - has been shared with the Trade Unions and no concerns were raised regarding sexual orientation; 	

		<ul style="list-style-type: none"> - do not require a whistleblower to provide details about their sexual orientation; - explicitly states that acts of discrimination can be reported under this policy;
11. Are there concerns there <u>could</u> be a have a differential impact due to <i>religion or belief</i>?		Brief statement of main issue
	NO	
What evidence exists for this?		The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the staff forums, Trade Unions, Service Managers, and the Corporate Communications group and no concerns were raised in this regard; - do not require a whistleblower to provide details about their religion or belief; - explicitly states that acts of discrimination can be reported under this policy.
12. Are there concerns there <u>could</u> be a differential impact due to people's age?		Brief statement of main issue
	NO	
What evidence exists for this?		The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the staff forums, Trade Unions, Service Managers, and the Corporate Communications group and no concerns were raised in this regard; - do not require a whistleblower to provide details about their age; - explicitly states that acts of discrimination can be reported under this policy.
13. Are there concerns that there <u>could</u> be a differential impact due to <i>being transgendered or transsexual</i>?		Brief statement of main issue
	NO	
What evidence exists for this?		The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the staff forums, Trade Unions, Service Managers, and the Corporate Communications group and no concerns were raised in this regard; - do not require a whistleblower to provide details of whether they are transsexuals or being transgendered; - explicitly states that acts of discrimination can be reported under this policy.
14. Are there any <i>other</i> groups that would find it difficult to access/make use of the function (e.g. young parents, commuters, people with caring responsibilities or dependants, young carers, or people living in rural areas)?		If yes, which group(s)?
	NO	
What evidence exists for this?		The Whistleblowing Policy: <ul style="list-style-type: none"> - has been shared with the staff forums, Trade Unions, Service Managers, and the Corporate Communications group and no concerns were

		<p>raised in this regard;</p> <ul style="list-style-type: none"> - explicitly states that acts of discrimination can be reported under this policy.
15. Are there concerns there could have a differential impact due to <i>multiple discriminations</i> (e.g. disability <u>and</u> age)?		Brief statement of main issue
	NO	
What evidence exists for this?		<p>The Whistleblowing Policy:</p> <ul style="list-style-type: none"> - has been shared with the staff forums, Trade Unions, Service Managers, and the Corporate Communications group and no concerns were raised in this regard; - explicitly states that acts of discrimination can be reported under this policy.

Conclusions & recommendation

16. Could the differential impacts identified in questions 7-15 amount to there being the potential for adverse impact?	YES	N/A
	NO	
17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason?	YES	N/A
	NO	
Recommendation to proceed to a full impact assessment?		
NO	This function/ policy/ service change complies with the requirements of the legislation and there is evidence to show this is the case.	
NO, BUT ...	What is required to ensure this complies with the requirements of the legislation? (see DIA Guidance Notes)?	<p>Minor modifications necessary (e.g. change of 'he' to 'he or she', re-analysis of way routine statistics are reported)</p> <p>Employees must be mindful of their responsibilities under the Dignity at Work (Bullying and Harassment) Policy and the implications of discriminating against colleagues, service users or others. This policy and other employment policies are promoted periodically and are available at all times on the councils intranet. This policy is included within the staff handbook.</p>
YES	Give details of key person responsible and target date for carrying out full impact assessment (see DIA Guidance Notes)	<p>Tricia Palmer, Assistant Director, Organisational Services.</p>

Action plan to make Minor modifications		
Outcome	Actions (with date of completion)	Officer responsible

Planning ahead: Reminders for the next review		
Date of next review	On-going	
Areas to check at next review (e.g. new census information, new legislation due)	Check whether the policy is being used and whether employees are aware of the policy and its purpose.	
Is there <i>another</i> group (e.g. new communities) that is relevant and ought to be considered next time?		
Signed (completing officer/service manager)	Date	
Signed (service manager/Assistant Director)	Date	