

## Whistleblowing policy review

| Proposed change                                                                      | Reason from good practice desk top review                                                                                                                                                                                                                                         | Risk                                                                                                                    |
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| Call the policy "Speak Up" rather than Whistleblowing                                | A lot of individuals do not know they are whistleblowers until they are labelled as one so may not consider the relevance of a policy like this. Alternatives that may be better for organisations are Speak-Up or Raising concerns policy.                                       | None identified                                                                                                         |
| Use "concern" rather than "complaint"                                                | The word complaint denotes a personal effect. Research shows in most cases whistleblowers raise concerns for prosocial and altruistic reasons and thus "concern" is a better word to use.                                                                                         | None identified                                                                                                         |
| Define concerns as more than the legally protected category                          | Research shows that a lot of concerns do not fall within these categories. Organisations may be missing out on opportunities to receive information by limiting types of concerns.                                                                                                | Increase in number of concerns received. Someone raising a concern does not have the legal protection they might expect |
| Define the people who can raise concerns widely                                      | This will enable greater opportunity for concerns to be responded to                                                                                                                                                                                                              | Increase number of concerns received.                                                                                   |
| Maintain a clear correlation between our Grievance Procedure and the Speak Up Policy | Research shows that a concern is more likely to be raised under a grievance policy than a whistleblowing policy. So the question for the organisation to consider is how to ensure whistleblowing concerns raised under a grievance procedure can be recognised and to have a way | None identified                                                                                                         |

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|                                                                           | of transferring them to the correct procedure.                                                                                                                                                                                                                                                                                                                               |                                        |
| Do not be too prescriptive about how concerns can be raised               | The law does not require a specific mechanism, so it is good for organisations to be open to any mechanism of disclosure.                                                                                                                                                                                                                                                    | Increase in number of concerns raised. |
| Be clear about the role of Line Managers                                  | Research shows that 50% of whistleblowing concerns are raised with the line manager or the line manager's manager.                                                                                                                                                                                                                                                           | None identified.                       |
| Consider concerns being raised with a multi-disciplinary "Response Group" | Best practice example from elsewhere. Gives confidence to the concern raiser that it will be taken seriously and acted upon. The Group can quickly triage the concern, communicate with the raiser of the concern what if any action will be taken and give a timeline. Often complex matters of concern naturally involve confidential discussions between senior officers. | None identified                        |
| Have the Policy and Procedure in one place                                | Easy to access both, but need to make sure that it clear which is which.                                                                                                                                                                                                                                                                                                     | None identified.                       |
| Suggest where the concern raiser can seek external advice and support     | An individual may want to talk through their concern before raising it as it might not be a concern at all thus organisations like trade unions or Protect (formerly Public Concern at Work) would be beneficial for them. A good policy would point concern raisers in these directions.                                                                                    | None identified.                       |
| Make clear that the policy has been the subject of consultation           | Research shows that individuals have greater faith in a policy where it has the approval of a trade union.                                                                                                                                                                                                                                                                   | None identified.                       |

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| with the Trade<br>Unions at<br>Medway |  |  |
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