



Building a Better Bournemouth

Bournemouth Borough Council Whistleblowing Policy

May 2017

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Consultees

The following individuals/groups have been consulted during the development of this policy:

Name	Organisation	Date consulted
Feriser Tasdelen	Bournemouth Borough Council – Head of Audit and Management Assurance	May 2016, June 2016, October 2016
Julie Liggett	Bournemouth Borough Council – HR Business Partner	May 2016, October 2016
Jane Portman	Bournemouth Borough Council – Executive Director, Adults and Children	June 2016, October 2016
Andy Sharp	Bournemouth Borough Council – Service Director, Adult Social Care	June 2016, October 2016
Carole Aspden	Bournemouth Borough Council – Service Director, Children and Young People	June 2016, October 2016
Neil Goddard	Bournemouth Borough Council – Service Director, Community Learning and Commissioning	June 2016, October 2016
Sue Ross	Bournemouth Borough Council – Service Director, Children's Social Care	June 2016, October 2016
Anthony Richings	Bournemouth Borough Council – Solicitor, Legal and Democratic	August 2016
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Bill Cotton	Bournemouth Borough Council – Executive Director, Environment and Economy	October 2016
Julian Osgathorpe	Bournemouth Borough Council – Executive Director, Corporate Services	October 2016
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Adam Richens	Bournemouth Borough Council – Service Director, Strategic Finance	October 2016
Gary Josey	Bournemouth Borough Council – Service Director, Housing and Communities	October 2016
Mark Smith	Bournemouth Borough Council – Service Director, Tourism	October 2016
Larry Austin	Bournemouth Borough Council – Service Director, Environment	October 2016
Roger Ball	Bournemouth Borough Council – Service Director, Development Services	October 2016
Steve Brown	Bournemouth Borough Council – Head Teacher, Linwood School	October 2016
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Nicola St John	Bournemouth Borough Council – Head Teacher, St Katherine's Primary School	October 2016

Sam Johnson	Bournemouth Borough Council – Equality and Diversity Manager	October 2016
Children’s Services Overview and Scrutiny Panel	Bournemouth Borough Council	February 2017
Adult’s and Community Overview and Scrutiny Panel	Bournemouth Borough Council	February 2017
Sean Hawkins	Bournemouth Borough Council - Policy and Performance	April 2017
Corporate Management Team	Bournemouth Borough Council	May 2017

Equalities Impact Assessment

Assessment date	November 2016
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Freedom of Information Act Exemption

FOI Exempt?	NO
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Revision History

Date	Version	Summary of Significant Changes	Section(s) Changed
August 2016	V.4	Inclusion of sections referring to 'safeguarding concerns' to promote and highlight how these differ from whistleblowing concerns and how these should be reported. The section includes contact details for both Adults and Children's safeguarding services.	1.4 – 1.7
August 2016	V.4	Clarification of the coverage of the whistleblowing policy other associated organisations such as Council trading companies, maintained schools and academies	4.1 – 4.5
August 2016	V.4	Clarification of who the whistleblowing policy applies to, including a definition of 'qualifying worker'.	4.6
August 2016	V.4	Clarification of the types of disclosure covered by policy, including definitions and examples, along with a reiteration of the role of the Head of Audit and Management Assurance in reporting concerns.	4.7 – 4.9
August 2016	V.4	Clarification of the protections that apply to whistleblowers when reporting concerns outside of the organisation, for example to an industry regulator.	4.10 – 4.11
August 2016	V.4	Update of links to additional information, including whistleblowing guidance released by the Department for Business Innovation and Skills, the Whistleblowing Commission and the charity Public Concern at Work.	8.1 – 8.3

1. Why do we have this policy?

Reason

1.1. The Council, the Bournemouth Group, its wholly owned trading companies and subsidiaries (hereafter referred to as 'the Council') are committed to high standards of conduct and to compliance with legal obligations and good practice. The Council's intent is to expose and deal with malpractice and it expects its employees, and others who help to deliver its services, to report all instances where they have reasonable suspicions of wrongdoing.

1.2. 'Whistleblowing' is when a worker reports suspected wrongdoing at work. This is called 'making a disclosure in the public interest'. Public Interest Disclosure legislation, stipulates that the Council is responsible for ensuring that any qualifying person raising concerns is protected from suffering any detriment as a result of them doing so and that their concerns will be assessed and/or investigated further.

Purpose

1.3. This policy incorporates the requirements of the Public Interest Disclosure legislation into the Council's governance framework and provides managers with the necessary information to consider cases of whistleblowing. The legislation is contained in Part IV A of the Employment Rights Act 1996 sections 43A to 47B and s.103A and secondary legislation identifying the prescribed persons to report concerns to and the specific areas each covers.

In addition, this policy aims to ensure that those covered by this policy:

- feel confident in raising concerns in the public interest about suspected serious wrongdoing in the Council and its services without fear of reprisals or victimisation even where the concern or allegations are not subsequently confirmed by the investigation;
- can raise concerns in confidence and receive feedback on any action taken;
- receive a response to concerns and are aware of how to pursue them if they are not satisfied; and
- are protected from possible reprisals or victimisation where they have reported concerns in the public interest.

Safeguarding Concerns:

1.4. Employees have a duty to report in a timely way any concerns or suspicions they may have that an adult or child at risk, is being, or is at risk of being, harmed. These safeguarding concerns should be reported using the referral processes set out below.

Children's Safeguarding:

1.5. Children FIRST is Bournemouth Council Families Initial Response and Safeguarding Team and provides a single point of contact for anyone who is worried about a child or young person. This Team is able to provide help:

- if you are worried a child or young person is at risk of, or is being harmed
- if you know of a child who may become significantly vulnerable without a coordinated multi agency offer of help and support.

The team takes all referrals into Children's Social Care and will assess quickly what help and support is required by gathering and sharing information.

To report Children's safeguarding concerns staff should contact the Multi Agency Safeguarding Hub via email: MASH@bournemouth.gcsx.gov.uk or via telephone: 01202 458101.

Where it is determined that the safeguarding concern is a disclosure in the public interest (as per paragraph 1.2), the matter must be reported to the Head of Audit and Management Assurance ('HAMA') to ensure proper recording of the matter (the HAMA can be contacted via email: audit&managementassurance@bournemouth.gcsx.gov.uk, or via telephone: 01202 451969).

Adults Safeguarding:

1.6. Bournemouth Care Direct is responsible for receiving and assessing Adults safeguarding concerns. The Service will make enquiries, or require others to do so on their behalf, if they reasonably suspect an adult meets the following criteria:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- Organisations continue to have a duty of care to adults who purchase their own care independently i.e. self-funders.

To report Adults safeguarding concerns staff should contact Care Direct via email: bmth.caredirect@bournemouth.gov.uk or via telephone: 01202 454979.

Where it is determined that the safeguarding concern is a disclosure in the public interest (as per paragraph 1.2), the matter must be reported to the Head of Audit and Management Assurance ('HAMA') to ensure proper recording of the matter.

1.7 Alternatively, if a safeguarding concern or allegation relates to the activities of a Bournemouth Borough Council officer, councillor, manager or team please follow the whistleblowing process set out in this policy.

2. Who must comply with the policy?

- Any person who is a qualifying worker currently or, in some circumstances, previously employed, directly or indirectly, by Bournemouth Borough Council including those whose relationship is with the Bournemouth Group or its subsidiaries;
- Councillors; and
- Any other individual who undertake activities on behalf of the Council including, for example, volunteers, partners, contractors etc.

3. Who needs to be aware of this policy?

- All council employees;
- Councillors;
- Members of the public;
- Trade unions;
- Inspectorates and regulatory bodies such as Ofsted, the Care Quality Commission, prescribed persons such as the Charity Commission, Tax Commissioners etc; and
- All other parties who undertake activities on behalf of the Council including, for example, volunteers, partners, contractors etc.

4. What is the policy?

4.1. The Council will take any action necessary in proportion to the nature of the complaint.

The Policy's intent is to ensure that whenever a qualifying person (see 4.6) has a reasonable belief that their disclosure is in the public interest and meets with one or more of the circumstances in paragraph 4.7 (a to f), they will be protected from detriment such as victimisation or being disciplined.

4.2. It is expected that all organisations that are part or wholly owned by the Council will have their own whistleblowing arrangements which ensure that proper reporting arrangements are in place which are consistent with the requirements of the Public Interest Disclosure legislation and that staff are fully protected in line with this legislation.

4.3. Maintained schools are required by the Department for Education to have their own in-house whistleblowing procedures (<https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools>). Maintained schools can make representation to the HAMA to act as an external representative.

4.4. The Academies Financial Handbook (July 2016) sets out the requirements for Academies in respect of their Whistleblowing arrangements. In doing so, the Handbook (section 2.3.5) states that Academies "must have appropriate procedures in place for whistleblowing, including making sure all staff are aware to whom they can report their concerns, and the way in which such concerns will be managed."

4.5. All organisations that carry out activities on behalf of the Council, for example providers of commissioned services, are expected to have appropriate and robust whistleblowing arrangements which are consistent with the requirements set out in the legislation and this policy.

4.6 You are protected by the legislation from any detriment and/or dismissal if you are a worker with Bournemouth Borough Council, the Bournemouth Group or one of its subsidiaries. 'Worker' has a special meaning for these legislative protections. As well as employees (part-time, full-time and fixed-term), it includes self-employed staff, agency workers and people who aren't employed but are in training with the Council, for example apprentices. Protection also covers former employees who have made disclosures whilst still employed if they suffer a detriment after employment.

Where a person is not a qualifying worker under the legislation, such as a volunteer, partner, licensee or contractor, they will be offered support, confidentially as far as possible, and a contact (such as the Head of Service in the case of volunteers) who can receive complaints which might otherwise be considered whistleblowing type concerns. Members of the public may be signposted to a relevant 'prescribed person' to send their concern to if the Council is not the appropriate body.

Types of disclosure covered by this policy

4.7. The Public Interest Disclosure legislation specifies what 'Qualifying Disclosures' are.

The worker disclosing information must have a reasonable belief that their disclosure tends to show that:

(a) that a criminal offence has been committed, is being committed or is likely to be committed,

(b) that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject,

(c) that a miscarriage of justice has occurred, is occurring or is likely to occur,

(d) that the health or safety of any individual has been, is being or is likely to be endangered,

(e) that the environment has been, is being or is likely to be damaged, or

(f) that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

4.8. Public interest disclosures must relate to some wrongdoing which may, but not necessarily, be unlawful such as failing to comply with a legal obligation. Where concerns are reported they must be considered fully regardless of whether it is suspected the disclosure is made with any self-interest or malice.

For the avoidance of doubt if the concern relates to an immediate safeguarding issue then the process set out in paragraph 1.4 should be followed.

4.9. Every qualifying disclosure (however minor) must be notified immediately to the HAMA who will keep a log and register the details. In each instance, when the matter is resolved, the HAMA must be notified promptly and the register will be updated. If the allegation is deemed to be without foundation, not a qualifying disclosure after all or resolved informally, the register will reflect this, but it is crucial that a record is maintained of all allegations for transparency and audit purposes.

What is expected from the whistleblower?

4.10. If you make a disclosure to someone within the Council, you are expected to:

- have reasonable grounds for suspicion about the malpractice; and
- have a reasonable belief that the disclosure is in the public interest.

4.11. This policy also covers disclosures made outside the Council where one or more of the following conditions apply:

- a) You reasonably believe you would suffer detriment if you made the disclosure to the Council; or
- b) The disclosure is made to an established regulator or prescribed person such as the NAO, OFSTED or the Charity Commission for example or other body which is generally accepted as protecting the public interest; or
- c) You have already made the disclosure to the Council and believe that the matter has not been dealt with.

It should be noted that an employee making disclosures to a prescribed person or an industry regulator must reasonably believe that the matter falls within the regulator's area of responsibility and that the information and any allegations contained in it are substantially true.

How is the whistleblower protected?

4.12. If the disclosure is 'in the public interest', the person making a qualifying disclosure will be protected from any detriment as a result of making that disclosure. In particular, they will be protected from harassment or victimisation. This may necessitate alternative working arrangements during any consequential investigation into the allegations.

4.13. Should it not be possible to resolve a concern without revealing the whistleblower's identity, the Council will discuss with the individual what steps will be taken to protect them from unfair treatment or detriment. However, if a whistleblower wants their identity to remain confidential, all possible steps will be taken to ensure this request is respected however it must be noted that this may not be possible where the disclosure results in legal or professional standards proceedings, tribunal hearings or where the matter disclosed has to be referred to other official bodies. However, in all cases the person making the disclosure will be consulted before their identity is disclosed. It should be recognised that if there are reasonable grounds for believing the allegations to be true, the public interest will rarely be served by taking no action.

4.14. Anonymous disclosures will be considered to the extent that it is reasonable and practicable to do so. It is often difficult to attach equal weight to anonymous allegations due to the investigator's difficulty in confirming or following up evidence. If an individual is unsure whether an incident should be reported under this policy, they may wish to discuss the matter initially with a trade union representative, their manager, Human Resources, the Monitoring Officer, the HAMA, or one of the Council's, the Bournemouth Group's or its subsidiaries' Executive Directors or the Head of Paid Service.

Vicarious liability

4.15. The requirements set out in the Public Interest Disclosure legislation set out the Council's responsibilities regarding vicarious liability and as such brings the whistleblowing legislation in-line with discrimination legislation. The legislation sets out the principle that an employer can be legally accountable (vicariously liable) for the actions of its workers who subject a whistleblower to any unlawful detriment. The Council must therefore ensure that there is an organisational culture that promotes openness and transparency.

4.16. The Council will have a defence against vicarious liability if they can show that they took all reasonable steps to prevent workers from victimising individuals who raise concerns. Training and effective whistleblowing procedures will contribute to maintaining this defence.

4.17. Councillors raising whistleblowing concerns as a result of matters that have come to their attention as serving Members of the Council, may not rely on this policy to remain anonymous in any investigation that may follow.

4.18. The relevant status and legitimacy of Councillor referrals under this policy will be determined by the Monitoring Officer in consultation with the Head of Paid Service. The decision of these officers will be final.

Restrictions

4.19. There can be some confusion between grievances and whistleblowing. Essentially whistleblowing is the raising of a concern about a danger or risk so that it may be investigated, while a grievance seeks redress for a wrong done to oneself.

This policy does **NOT** apply to raising grievances about a worker's personal situation and thus, does not replace existing procedures for personal differences or conflicts. If you have concerns in respect of a personal grievance (e.g. bullying, harassment, discrimination) you should consult the Grievance Policy or your immediate manager, Human Resources and/or Legal Services who can advise you about the correct procedure to follow.

4.20 Councillors are not employees of the Council and are therefore not protected under whistleblowing legislation. However, Councillors should raise any concerns via the proper democratic processes of the Council, by contacting one or more of the following;

- Leader of the Council
- Head of Paid Service
- Monitoring Officer
- The relevant Overview and Scrutiny Panel

Other related policies

- Grievance Policy
- Bullying and Harassment Policy
- Corporate Health and Safety Policy

5. How is this policy implemented?

Procedures

5.1. Disclosures will be dealt with under the following stages. Not all disclosures will follow all stages in the order below, subject to the particular circumstances of each case. The action taken by the Council will be reasonable and proportionate, depending on the nature of the concern.

5.2. This procedure will be applied in conjunction with Part D of the Council's Financial Regulations and Procurement Rules (Audit & Risk Management). Disclosures will be dealt with under the following stages:

- Stage 1 – Informal Resolution
- Stage 2 – Formal Disclosure
- Stage 3 – Initial Response to a Formal Discussion
- Stage 4 – Management Investigation
- Stage 5 – Responding to a Management Investigation
- Stage 6 – Confirmation of the Outcome

Further details about the procedure can be found in appendix 1.

Implementation and communication

5.3. New staff joining the Council will be given information and guidance on the policy during their corporate induction and it will be integrated into training and documents relating to conduct and behaviour. The policy will be publicised using the Council's intranet sites.

5.4. All managers will be expected to take particular note of their responsibilities in relation to allegations and protecting whistleblowers from any adverse treatment. Where appropriate, management should seek advice from Human Resources and/or Legal Services.

Enforcement

5.5. The responsibility for ensuring that the Council adheres to this Policy rests with all managers, who have an obligation to support and encourage staff to speak out, to protect them from detriment and to take action where staff are subjected to any disadvantage relating to whistleblowing.

How the policy will be monitored?

5.6. The Council has a responsibility for registering the nature of all concerns raised and to record the outcome. The Council's Internal Audit Section and Human Resources will jointly produce an annual report to the Audit and Governance Committee in respect of the number, type and outcomes reported of whistleblowing allegations.

6. Exceptions:

6.1. Exceptions to the Whistleblowing Policy will include situations such as:

- where a person has disclosed information in respect of which a claim for legal professional privilege could be maintained in legal proceedings and they received that information in the course of obtaining legal advice. Lawyers are in a special position and staff may not be covered by the protection for making disclosures where they receive information covered by legal professional privilege. If unsure about their special duties, they should seek professional advice; or
- if the person making the qualifying disclosure commits an offence by making it.

7. General Note

7.1. This policy conforms to the law regarding the making of protected disclosures under the Public Interest Disclosure Acts and the Employment Rights Act 1996 (as amended) but it is not and is not intended to be a complete statement of the law. Individuals who are concerned about their position with regards the law should obtain legal advice.

8. Supporting information

Additional information can be found at:

8.1 The Department for Business Innovation and Skills has published 'Whistleblowing: Guidance for Employers and Code of Practice'. This document can be found at:

<https://www.gov.uk/government/publications/whistleblowing-guidance-and-code-of-practice-for-employers>.

8.2 The Whistleblowing Commission, established in 2013 by the charity Public Concern at Work (PCAW), has produced a 'Whistleblowing Code of Practice' which sets out best practice for whistleblowing policies, appropriate training in handling whistleblowing complaints and review and monitoring of whistleblowing in the workplace.

8.3 Employees who have major concerns arising from their employment may wish to seek advice from their union or the charity Public Concern at Work (0207 404 6609 – www.pcaw.org.uk), to see whether the information which they wish to report would meet the definition of a 'qualifying disclosure' and whether they should be using this procedure, or an alternative.

Appendix 1

Whistleblowing Reporting, Investigation and Resolution Procedure

Stage 1 – Informal Resolution

In some situations the problem may be resolved without the need for a major investigation. If an individual is aware or concerned about misconduct or wrongdoing taking place inside the organisation that he or she thinks may damage or undermine the interests of the wider public they are advised in the first instance to share the details with their line manager or Service Director to see if it can be resolved without a formal procedure. This may be done orally or in writing.

The individual does not need to declare their disclosure as a “Disclosure in the Public Interest” in order for it to be acted upon. Management must be aware of their responsibilities in identifying and reporting the disclosure in line with this policy.

When making a disclosure, give as much information as possible about:

- The nature of the problem
- The background (with dates if possible)
- Who is involved
- The reasons you are concerned

The line manager should decide on the basis of the information so provided, how the matter can be resolved. This may include informal resolution or formal consideration. The outcome will be explained to the whistleblower.

Every qualifying disclosure (however minor) must be notified immediately to the HAMA who will keep a log and register the details (the HAMA can be contacted via email: audit&managementassurance@bournemouth.gcsx.gov.uk, or via telephone: 01202 451969). In each instance, when the matter is resolved, the HAMA must be notified promptly and the register will be updated. If the allegation is without foundation or resolved informally, the register will reflect this, but it is crucial that a record is maintained of all allegations for transparency and audit purposes.

Stage 2 – Formal Disclosure

If the individual feels unable to discuss their concerns with their line manager or Service Director, or does not accept that the response at the informal stage is sufficient, or it is believed that senior management is involved in the matter of concern, a formal disclosure may be made to the HAMA or one of the following: Monitoring Officer or the Head of Paid Service.

If the allegation concerns one or more of these officers, the disclosure may be made to the Council's External Auditors or any another relevant prescribed person. Individuals should seek advice about who would be the most appropriate person e.g. Charity Commission, Tax Commissioners, Police, Health & Safety Executive, Environment Agency, Financial Conduct Authority (for regulated finance matter) etc.

It should be noted that an employee making disclosures to a prescribed person, such as an industry regulator, must reasonably believe that the matter falls within the regulator's area of responsibility and that the information and any allegations contained in it are substantially true.

At this stage, the person making the disclosure (the 'whistleblower'), will be asked whether he or she wishes their identity to be disclosed and will be reassured with regard to protection from possible reprisals or victimisation.

He or she may also be asked to consider making a written or verbal statement. In the latter case, a brief summary of the interview will be made which will be agreed by both parties.

Details of the disclosure will be considered by the HAMA, or the Monitoring Officer or the Head of Paid Service or his/her representative, including any recommendations for further action.

Stage 3 – Initial Response to a Formal Disclosure

The HAMA, Monitoring Officer or the Head of Paid Service or representative who has received the disclosure will take any urgent action they deem necessary and then decide how to respond to the disclosure, having regard to all the circumstances, including the evidence available. Preliminary inquiries will be made to establish the nature of the issue and how best to respond in the public interest.

Depending on the nature of the issue raised and the findings of the preliminary enquiry, the response, in the judgement of the HAMA, Monitoring Officer or the Head of Paid Service may be to action one or more of the following:

- a management investigation in consultation with HR and Legal Services;
- a disciplinary investigation in accordance with Council's, the Bournemouth Group's (or one of its subsidiaries') policies;
- a referral for consideration under other procedures;
- a referral to the Police;
- a referral to the External Auditor;
- an independent investigation;
- amendment of procedures;
- no action due to lack of sufficient evidence; or
- make a decision as to the non-relevance/significance to this Policy.

The whistleblower will be notified of the intended response to the disclosure and the reasons for it. The timeframes for an initial response to a formal disclosure will depend on the nature and complexity of the concern raised.

Stage 4 – Management Investigation

Where the decision has been made to carry out a management investigation, a senior manager or other person will be appointed as the investigating officer.

He or she will agree terms of reference with the HAMA, Monitoring Officer or the Head of Paid Service or relevant representative and identify a provisional date when the investigation should be completed by. The investigation will be carried out observing the strictest confidentiality. The investigation is essentially a 'fact finding' exercise, to establish the facts and determine what further action may be necessary and make recommendations accordingly. A report will be produced detailing the findings and recommendations for review by the HAMA.

The investigating officer will have regard to the human rights of any individuals affected by the investigation. The investigation may also serve as the information gathering part of the Council's, the Bournemouth Group or its subsidiaries' disciplinary procedures. In such cases this will be made clear to any people who may be subject to such investigation and any right to be accompanied will be made clear.

Normal support arrangements - e.g. counselling/unions/HR - will be available as required, to the whistleblower, any person accused of being involved in, or having concealed, wrong-doing and any others affected.

Stage 5 – Responding to Management Investigation

The HAMA, Monitoring Officer or the Head of Paid Service or representative will decide whether any further action is necessary as a result of the investigation report and recommendations. If the result of the investigation is that there is a case to be answered by any individual, the recognised procedure will be followed.

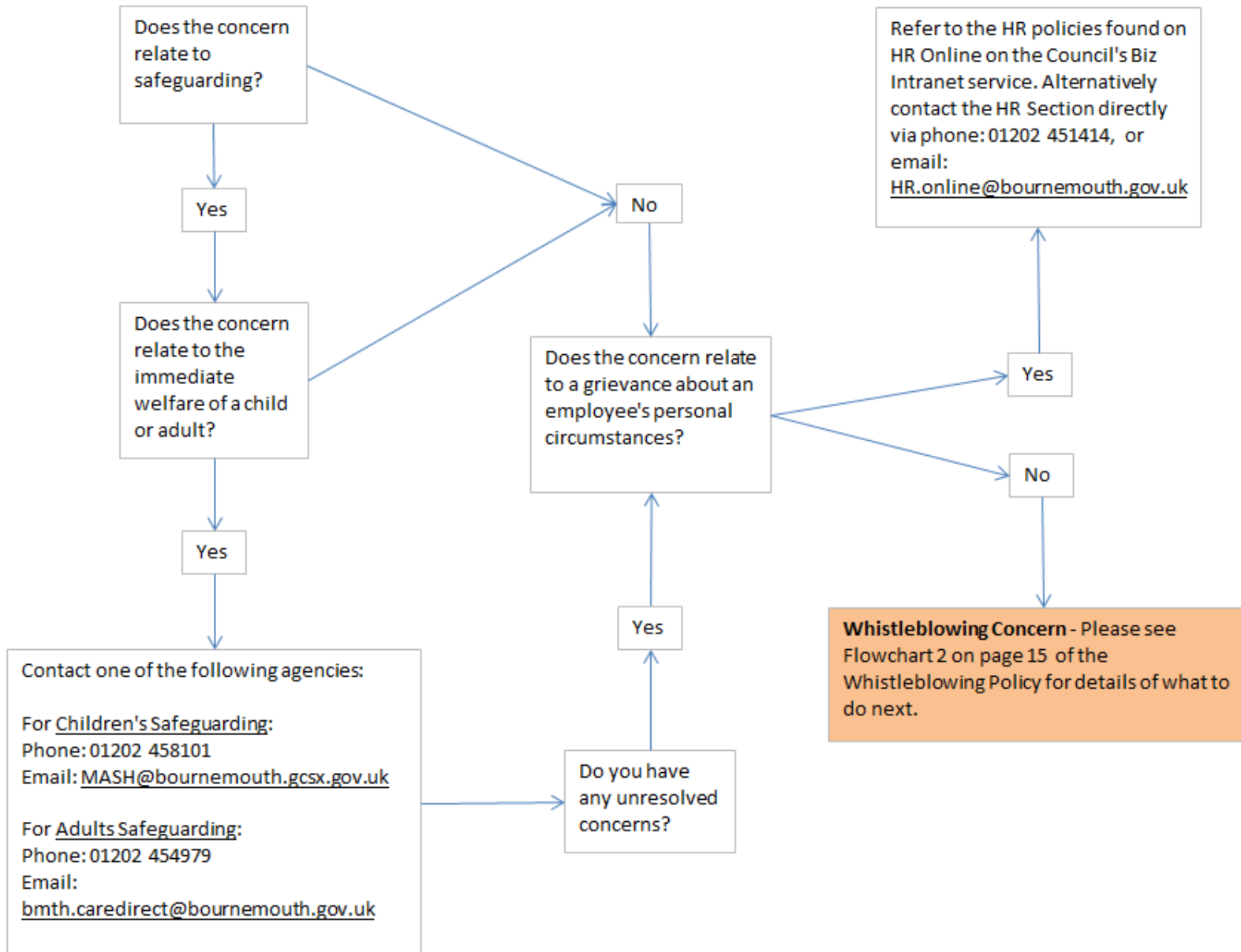
The amount of contact between the officers considering the issues and the worker/employee/Councillor raising the concern will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information may be sought from the person raising the concern.

The Council, the Bournemouth Group or its subsidiaries will take all steps to ensure that the whistleblower suffers no reprisals or victimisation as required by the Public Interest and Disclosure legislation.

Stage 6 – Confirmation of the Outcome

So far as legally possible and subject to rights of confidentiality, the whistleblower will be informed of the outcome of the investigation and how the matter has been resolved.

Flowchart 1: Is this a whistleblowing concern?



Flowchart 2: The Whistleblowing Process

