

Whistleblowing Policy

The Policy is generally good except that it fails to define with any clarity what are the "malpractices" concerned.

I would recommend the following amendments to the Policy:-

1.1, line 2 Amend to "something **going** seriously wrong". I think this expresses the kind of concern that is likely to be raised.

1.1 Delete the last two lines. They are unnecessary and do nothing to convey the message.

1.6 This is the most important point. "Malpractice" must be defined, not by a series of rather misleading examples as in 2.5. "Illegal acts or omissions" are clear enough, but what else? The suggestion that contraventions of the policies listed in 2.2 are not included is surely mistaken. Malpractice must include contravention of any of the authority's policies as well as any form of corruption, favouritism or discrimination. It must also include gross negligence in performance of duty by officers or Councillors that is likely to harm the Authority or its reputation. There may well be other kinds of behaviour that should be added to this definition.

Page 30, first bullet point Better to say "upon those concerns", omitting "about practices".

2.2, 2.3 and 2.4 I doubt whether it is useful to list the policies in 2.2, the list anyway not being exhaustive. It is not clear what route other than whistleblowing is to be followed for contravention of these policies. The second bullet point in 2.4 is so vague that it should be omitted. The examples quoted in 2.5 immediately raise questions - for instance whether it is all right for a client/customer to be abused by a junior member of staff! I would recommend the deletion of 2.2 - 2.5 inclusive.

2.6, line 1 Delete "some". We must be more definite.

5.1, line 2 "but they **may** be considered"

5.3 Delete. An anonymous whistleblower should have no right to feedback. Indeed notice should only reluctantly be taken of such a complaint.

6.1 and 6.2 The order of these two paragraphs would be better reversed.

7.1 There should be more information about how to access the Employee Assistance Programme.

11.1, seventh bullet point. Would this independent person or organisation be nominated anyway? Would the whistleblower be informed of their existence and how to contact them?