



# **Draft whistleblowing policy**

## What is whistleblowing?

1. Public Concern at Work (a charity that provides independent advice and information on whistleblowing) gives the following explanation:

When someone blows the whistle they are raising a concern about danger or illegality that affects others (e.g. customers, members of the public, or their employer). The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concern – they are simply trying to alert others. For this reason, the whistleblower should not be expected to prove the malpractice. He or she is a messenger raising a concern so that others can address it.'

## Links to strategic objectives

2. This response plan underpins all of the council's strategies, initiatives and work plans.

## Purpose of the whistleblowing policy

- 3. This is a joint policy adopted by South Oxfordshire District Council and Vale of White Horse District Council. The policy aims to provide an avenue to raise concerns within the relevant council.
- 4. The councils face the risk that something may go wrong and they welcome the opportunity to address those risks as early as possible. Whenever a situation arises, the first people to know of the risk can often be those who work in or for a council. Whilst they are the people best placed to raise the concern before damage is done, they often fear they have the most to lose if they do speak up.
- 5. An organisation that can overcome a culture of silence by encouraging openness is likely to benefit by:
  - deterring wrongdoings
  - picking up potential problems early on
  - enabling critical information to get to the people who need to know and can address the issue
  - demonstrating that the council is accountable and well managed
  - reducing the risk of anonymous and malicious leaks
  - minimising the costs and compensation from accidents, investigations, litigation and regulatory inspections

- maintaining and enhancing its reputation.
- 6. Consequently, the councils believe that supporting whistleblowing makes good business sense. Ignoring such situations may mean that they do not take action before real damage occurs.
- 7. To this end, the councils commit to the highest possible standards of openness, honesty and accountability in their activities. They expect a high standard of conduct and integrity from their councillors and their employees.
- 8. The councils will take seriously and investigate all reports of improper activities. This whistleblowing policy aims to ensure that when people raise concerns properly, the councils address the concerns and protect the person raising the concern.
- 9. In referring to this policy in its contracts with suppliers and its procurement guide, the council aims to mitigate the risk of inappropriate behaviour taking place.

## Who this policy applies to

- 10. This policy is intended to help employees (including temporary and agency staff), councillors, co-optees on the council's committees, others with whom the councils deal (e.g. partners, contractors, suppliers and voluntary organisations), and members of the public to understand how and when to contact the relevant council with their concerns.
- 11. All councillors and employees have a responsibility to their colleagues, the councils and the community to ensure that they draw attention to any suspected malpractice or irregularity and to ensure that it is dealt with promptly.
- 12. In accordance with South Oxfordshire District Council's Financial Procedure Rules within the council's Constitution, "a councillor or member of staff or any organisation or person acting on behalf of the council shall notify the council immediately of any financial or accounting irregularity, or suspected irregularity, or of any circumstances which may suggest the possibility of such loss or irregularity, including those affecting cash, stores, property, remuneration or allowances"
- 13. Members of the public may also have concerns, but be unsure how and when to express them.
- 14. In order to protect public assets, each council wishes to see those contractors with whom they work,

## What this policy covers

15. This policy aims to address serious concerns about inappropriate behaviour that fall outside the scope of other procedures. That concern may be about the following (the list is not exhaustive):

- any criminal offence, particularly fraud or corruption
- unauthorised use of public funds
- a failure to comply with a legal obligation
- the endangering of an individual's health and safety
- damage to the environment
- actions that are contrary to the councils' standing orders, financial regulations or any other approved policies
- actions or behaviour that fall below established standards of practice, including councillors' and employees' codes of conduct
- a person abusing their position for any unauthorised purpose or for personal
- harassment, discrimination or victimisation of either staff or customers
- the deliberate concealment of information relating to any of the above matters
- other unethical conduct or any intention to conceal any of the above.

## What this policy does not cover

- 16. This policy does not cover matters that are covered by other procedures, such as:
  - employees' complaints about their terms and conditions of employment. The councils will deal with such matters through the grievance procedure.
  - complaints from members of the public about either council's services. The relevant council will deal with these through its own complaints procedure. However, a member of the public may report a whistleblowing concern using the relevant council's complaints procedure.
  - staff bringing to the attention of the appropriate level of management any deficiency in the provision of service. To do this is not whistleblowing under the employees' code of conduct unless there was some serious failing of the type listed in paragraph 15 above.
  - complaints about the behaviour of councillors or co-optees (those invited to join the councils' committees as independent members or because of their expertise) where the code of conduct covers the alleged behaviour.
  - allegations of abuse against a child, young person or vulnerable adult. You should report such allegations to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.

# Is it a grievance or is it whistleblowing?

17. Whistleblowing is where a person has a concern about danger or illegality that has a public interest aspect to it, usually because it threatens others (for example customers or the public). On the other hand, a grievance or private complaint is a dispute about the employee's own employment position and has no public interest dimension.

18. Where issues involve other policies or maybe a formal grievance, the relevant council will consider the facts, assess the risks and decide how it will best deal with the matter. The relevant council will make their reasons known.

#### **Protection for whistleblowers**

- 19. In accordance with the Public Interest Disclosure Act 1998 (often referred to as the whistleblowing act), the councils undertake to protect as best they can an employee who blows the whistle from personal claims, victimisation, harassment or bullying as a result of his or her disclosure and will not initiate any disciplinary action against them so long as the disclosure was:
  - made in good faith
  - reasonably believed to be substantially true, and
  - not made for personal gain.
- 20. The councils will not tolerate threats of victimisation to whistleblowers, which includes deterring them from raising concerns or suppressing concerns they have raised.
- 21. However, any employee taking any reprisal or similar action against a whistleblower because he or she has made a disclosure under this policy will be subject to disciplinary action by their council of employment.
- 22. Similarly, any councillors or co-optees taking such action will be reported to the monitoring officer as a potential code of conduct complaint.
- 23. The relevant council will treat matters of concern raised with as much confidentiality as possible depending upon the situation. The councils will not reveal names or positions without permission, unless it has to by law, or an enquiry results in a criminal investigation in which the whistleblower might be required as a witness. However, whistleblowers should be aware that the fact that if the relevant council has started making enquiries this might result in the whistleblowers identity becoming known. The relevant council will explain this at the time a whistleblower raises a concern, so the whistleblower can decide whether to proceed. The councils will also keep the whistleblower informed if the situation significantly changes.
- 24. A trade union representative, a fellow employee or an interpreter may accompany whistleblowers who give evidence during disciplinary hearings.
- 25. Any disciplinary or redundancy procedures that already affect the whistleblower will not influence any investigation into allegations of potential malpractice if properly made.
- 26. The protection outlined above will not apply and the employee may be subject to disciplinary action where the employee acts in a malicious or improper way (for example by leaking information to the press before the relevant council has had a chance to investigate and put the matter right).

## **Anonymous allegations**

- 27. The councils encourage whistleblowers to give their name when making an allegation. They will do all they can to protect the whistleblower. Concerns raised anonymously tend to be far less effective and if, for example, the relevant council does not have enough information, it may not be able to investigate the matter at all.
- 28. Also, from a practical point of view, the council concerned cannot provide protection to a person whose identity they do not know. It then becomes more difficult to judge whether the person raised the concern in good faith or maliciously.
- 29. If whistleblowers feel that they cannot give their name, the relevant council will make a judgement on whether or not to consider the matter depending upon such things as:
  - the seriousness of the issue
  - whether the concern is believable
  - whether it can sufficiently investigate the case based on the information provided.

### Untrue allegations

- 30. If a whistleblower makes an allegation which they believe is true, but it is not confirmed by investigation, the relevant council will not take any action against them.
- 31. However, if a whistleblower makes a deliberately false or malicious allegation that they know is untrue, the relevant council will take appropriate disciplinary or legal action against them. The Public Interest Disclosure Act 1998 does not protect people making allegations of this nature.

#### How to raise a concern

- 32. Whistleblowers should not attempt to investigate any concern themselves, but should raise their concern using one of the avenues shown below.
- 33. A person wishing to raise a concern that involves Vale of White Horse District Council should use the contact details relevant to that council, which are set out within this policy. A person wishing to raise a concern that involves South Oxfordshire District Council should use the contact details relevant to that council, which are set out within this policy.
- 34. The following paragraphs contain general advice for all readers. Later paragraphs in this section contain more specific advice depending on whether the council employs you; you are a councillor or co-optee; or a member of the public.
- 35. The councils encourage whistleblowers to raise concerns promptly, preferably in writing, giving as much information as possible, such as relevant background,

- names, dates, places and the reason for their concern. However, a person can raise a concern by telephone or by meeting the appropriate employee. The earlier a person raises a concern, the easier it will be to take effective action.
- 36. Although the whistleblower does not need to prove beyond doubt that an allegation is true, the councils expect a whistleblower to demonstrate that reasonable grounds exist for voicing their concern.
- 37. The council will ask any councillor, co-optee or employee making an allegation under this policy to declare any interest they may have in the concern they raise.
- 38. In matters concerning the health, safety and welfare of those on council premises (whether members of staff, contractors or visitors) anyone, including an elected safety representative, who becomes aware of a hazard (actual or potential) or dangerous occurrence should immediately notify the relevant council's health and safety officer. They should do this before contacting any outside body to ensure that the relevant council can take immediate action if necessary to deal with the hazard.
- EMPLOYEES EMPLOYED BY EITHER COUNCIL
- 39. Normally, a council employee should raise a concern with their immediate manager or secondly their head of service. The document 'Guidance for employees – how to react to concerns of inappropriate behaviour' in appendix 1, provides information on how to proceed. If the allegation relates to the suspected abuse of a child, young person or vulnerable adult, the public should report it to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.
- 40. Guidance to managers on how to deal with a concern is contained in the document 'Guidance for managers - how to react to concerns of inappropriate behaviour' in appendix 2.
- 41. If the employee feels that it is inappropriate to raise a concern with their manager or head of service, given the person involved and/or the seriousness or sensitivity of the matter, they should contact one of the following employees:
  - The chief executive
  - A strategic director
  - The head of legal and democratic services (as the monitoring officer)
  - The internal audit manager
- 42. If a concern involves one of the employees listed in paragraph 41, or if the whistleblower believes such employee(s) may be biased, they should refer the matter directly to the chief executive.
- 43. If a concern involves the chief executive, the whistleblower should refer the matter to the monitoring officer.

- COUNCILLORS, CO-OPTEES AND MEMBERS OF THE PUBLIC
- 44. If someone who is not an employee of the council wishes to raise a concern, they should do so with one of the people listed in paragraph 41. Members of the public can report any concerns through the council's complaints procedure. If the allegation relates to the suspected abuse of a child, young person or vulnerable adult, the person should report it to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.
- 45. People who do not work for the council can contact the person responsible for the relevant council's whistleblowing policy in any of the following ways:

#### **South Oxfordshire District Council**

 By writing to the Head of Legal and Democratic Services (as the Monitoring Officer) at:

South Oxfordshire District Council.

Benson Lane,

Crowmarsh Gifford.

Oxfordshire

**OX10 8QS** 

Please write 'For the personal attention of the monitoring officer' on your envelope

- Telephone: 01491 823000 (via the council's switchboard) or direct on 01491 823656
- Email: monitoringofficer@southoxon.gov.uk
- The council also has a dedicated anti-fraud hotline, which is available 24 hours a day on **0800 169 5716** or email: <a href="mailto:fraud@southoxon.gov.uk">fraud@southoxon.gov.uk</a>.

#### **Vale of White Horse District Council**

 By writing to the Head of Legal and Democratic Services (as the Monitoring Officer) at:

Vale of White Horse District Council

**Council Offices** 

**Abbey House** 

Abingdon

OXON

**OX14 3RJ** 

Please write 'For the personal attention of the monitoring officer' on your envelope

- Telephone: 01235 520202 (via the council's switchboard) or direct on 01235 540407
- Email:

 Calling the Vale of White Horse District Council's confidential 24-hour benefit fraud hotline 01235 540330. During office hours you can speak to a person. The council has an answer phone available outside office hours. The council treats all information in confidence. The council has further information on benefit fraud on its website.

## Help for the whistleblower

- 46. People who do not work for the council might want to discuss their concern with a friend or colleague first. They may then find it easier to raise a concern if others share the same experiences or concerns.
- 47. Trade union representatives can give support and advice to employees or act on their behalf if this would help. This could be useful, particularly if the employee wishes to remain anonymous, to the extent that is possible.
- 48. The councils will encourage the trades unions to support any member of staff who raises a concern with them.
- 49. Public Concern at Work (PCAW) can offer free, confidential advice to people concerned about crime, danger or wrongdoing at work. Anyone can contact them in the following ways

Public Concern at Work (PCAW) Suite 301 16 Baldwin Gardens London EC1N 7RJ

t: 020 7404 6609 f: 020 7404 6576

e: helpline@pcaw.co.uk

# The recipient's role in acting on a whistleblowing report

- 50. On receiving an allegation, the recipient (it is generally assumed that this would be a line manager or the head of service within the relevant council) should:
  - only listen to and note the concerns of the individual but must not attempt to carry out any investigation as this may damage any future enquiry if evidence is not in a legally admissible form
  - make this policy available to the person making the report
  - follow the guidance in appendix 2 to this policy
- 51. Having received the allegation, the recipient should contact the monitoring officer.

## How the relevant council will respond

52. In order to protect individuals and the council concerned the monitoring officer, who has the authority to act independently, will deal with initial enquiries. The

purpose of the initial enquiry is to confirm or repudiate the suspicions that have arisen so that, if necessary, the council should instigate a further investigation.

- 53. During the initial enquiry, the monitoring officer will:
  - determine the factors that gave rise to the suspicion
  - examine factors to determine whether a genuine mistake has been made or whether any irregularity has occurred (i.e. any incident or action that is not part of normal operation of the system or the expected course of events) and
  - where necessary, carry out discreet enquiries with staff and/or review documents.
- 54. The monitoring officer will consult with the chief executive, the section 151 (chief finance) officer and the internal audit manager. They will agree whether an investigation is appropriate and, if so, whether the responsibility will pass to the section 151 (chief finance) officer and what form it should take. The relevant council will normally refer concerns or allegations that fall within the scope of other existing policies and procedures for consideration under those procedures and will advise the whistleblower accordingly. The matter could involve:
  - investigation by management, internal audit, or through the disciplinary process
  - referral to the police
  - referral to the Audit Commission (external auditor)
  - an independent inquiry.
- 55. The monitoring officer, or if responsibility for the case has passed to the section 151 (chief finance) officer, can decide to take no further action if a complaint appears to be trivial or malicious.
- 56. If the concern raised involves the monitoring officer, the chief executive will initially deal with the allegation and will nominate a responsible employee to conduct initial enquiries with the same authority that the monitoring officer would have.
- 57. Within 10 working days of a concern being received, the council will write to the whistleblower to:
  - acknowledge receipt of the concern
  - explain how the council proposes to deal with the matter
  - indicate whether any initial enquiries have been received
  - state whether further investigations will take place and if not, why not.
- 58. The amount of contact between the people dealing with the allegation and the whistleblower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. The monitoring officer or if responsibility for the case has passed to the section 151 (chief finance) officer, will make the relevant council's final decision upon the level of contact or involvement by the whistleblower and will inform the whistleblower that there is no further need for their involvement.

- 59. Any meetings arranged will normally take place at the relevant council's offices but that council can agree to have the meeting elsewhere. At any meetings, a friend, a representative from a trade union or professional association, or an interpreter can accompany the whistleblower.
- 60. The relevant council will take steps to reduce any difficulties that the whistleblower may experience after raising a concern. For instance, if the whistleblower needs to give evidence in criminal or disciplinary proceedings, the relevant council will provide support and advice on the procedures.
- 61. The councils accept that in the working environment members of staff need assurance that the relevant council has properly addressed the matter raised. Thus, subject to legal constraints, the council will provide information to the member of staff about the outcome of any investigation.
- 62. If responsibility for the case has passed to the section 151 (chief finance) officer, they will advise the monitoring officer of the outcome of the case to enable the monitoring officer to fulfil their reporting responsibilities under this policy.
- 63. The monitoring officer will report as necessary all concerns raised and the outcomes (in an anonymous format) to the Audit and Corporate Governance Committee at South Oxfordshire District Council and the Audit and Governance Committee at Vale of White Horse District Council.

## Taking further action

- 64. This policy aims to provide an avenue to raise concerns within the relevant council.
- 65. If the whistleblower decides to take the matter outside the council, they must ensure that they do not disclose information about a third party e.g. a company or a private individual, which may be covered by a duty of confidentiality.
- 66. Before taking matters to an external body, the council advises the whistleblower to seek independent legal advice.
- 67. If an individual feels they should take the matter outside this process, the following are possible contact points:
  - The Audit Commission's dedicated telephone hotline for receiving disclosures - 0845 0522 646
  - The local Citizens Advice Bureau
  - Relevant professional bodies or regulatory organisations
  - The Environment Agency
  - The police (if it is potentially a criminal matter)
  - The Health and Safety Executive
  - A relevant voluntary organisation
  - A trades union
  - The Local Government Ombudsman
  - Equality and Human Rights commission

- Public Concern at Work
- 68. If a whistleblower, having raised a concern directly with the council, is dissatisfied with the outcome, they can also contact any of the above organisations.

## Person responsible for this policy

69. The monitoring officer has overall responsibility for the maintenance and operation of this policy, and they will liaise as necessary with the chief executive, the section 151 (chief finance) officer and internal audit manager.

## Monitoring and review

- 70. The monitoring officer will decide when this policy requires review to take account of any change of legislation or council policy.
- 71. Related documents and policies
  - Dignity at work policy
  - Anti-fraud and corruption response plan
  - Budget and policy framework procedure rules
  - Code of conduct for councillors and its associated complaints procedure
  - Code of conduct for employees (South Oxfordshire District Council only)
  - Complaints policy and procedure
  - Contracts procedure rules
  - Councillors' allowances scheme
  - Disciplinary procedure (for employees)
  - Financial procedure rules
  - Gifts and hospitality guidance for officers
  - Grievance procedures (for employees)
  - Local code of governance (South Oxfordshire District Council)
  - Money laundering policy
  - Planning code of good practice for councillors
  - Protocol on councillor/employee relations (South Oxfordshire District Council)
  - Public Interest Disclosure Act 1998
  - Safeguarding children and vulnerable adults policy
  - Scheme of delegation
  - Service specific procedure manuals

# **Appendix 1**

#### WHISTLEBLOWING - GUIDANCE FOR EMPLOYEES

## How to react to concerns of inappropriate behaviour

The action that you take when you first suspect inappropriate behaviour may be crucial. This guidance tells you what you should and should not do if you suspect such behaviour in the council.

Inappropriate behaviour is described in the council's whistleblowing policy as:

- any criminal offence, particularly fraud or corruption
- unauthorised use of public funds
- a failure to comply with a legal obligation
- the endangering of an individual's health and safety
- damage to the environment
- actions that are contrary to the council's standing orders, financial regulations or any other approved policies
- actions or behaviour that fall below established standards of practice, including councillors' and employees' codes of conduct
- a person abusing their position for any unauthorised purpose or for personal gain
- harassment, discrimination or victimisation of either staff or clients
- the deliberate concealment of information relating to any of the above matters
- other unethical conduct that is intended to conceal any inappropriate behaviour set out above.

Note: if you suspect abuse of a child, young person or vulnerable adult, you should report it to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy

# Acting upon your suspicions – the do's and don'ts

If you suspect inappropriate behaviour within the council, there are a few simple rules that should be followed to help the council with subsequent enquiries:

#### Do

- make an immediate note of your concerns and note all relevant details. This should ideally include:
  - background details and nature of the suspicions (including relevant names, dates and locations)
  - details of the job and areas of responsibility of the individuals implicated.
  - why the person raising the matter is concerned
  - action (if any) taken to date before this concern was raised

- convey your suspicions to someone with the appropriate authority and experience in accordance with the council's whistleblowing policy.
- ✓ deal with the matter promptly if you feel your concerns are warranted.

Delay may cause the council to suffer further financial loss or make further enquiry more difficult.

#### Don't

- × do nothing.
- be afraid of raising your concerns.

You will not suffer any recrimination from the council as a result of voicing a reasonably held suspicion. The council will treat the matter sensitively and confidentially if it is able to, and will take reasonable steps to protect anyone who raises a well intentioned concern.

- × approach or accuse any individuals directly.
- x try to investigate the matter yourself.

There are special rules surrounding the gathering of evidence.

Any attempt to gather evidence by people who are unfamiliar with these rules may weaken or destroy any future prosecution should that be thought appropriate.

convey your suspicions to anyone other than those indicated in the council's whistleblowing policy.

The Public Interest Disclosure Act 1998 will protect you from any reprisals as long as you meet the rules set out in the Act.

#### The rules are:

- you must disclose the information in good faith
- you must reasonably believe it to be substantially true
- you must not seek any personal gain.

# **Appendix 2**

#### WHISTLEBLOWING – GUIDANCE FOR MANAGERS

### How to react to concerns of inappropriate behaviour

The action that you take when you first identify or are made aware of suspected inappropriate behaviour may be crucial in determining the success of any subsequent investigation.

Inappropriate behaviour is described in the council's whistleblowing policy as:

- any criminal offence, particularly fraud or corruption
- unauthorised use of public funds
- a failure to comply with a legal obligation
- the endangering of an individual's health and safety
- damage to the environment
- actions that are contrary to the council's standing orders, financial regulations or any other approved policies
- actions or behaviour that fall below established standards of practice, including councillors' and employees' codes of conduct
- a person abusing their position for any unauthorised purpose or for personal gain
- harassment, discrimination or victimisation of either staff or clients
- the deliberate concealment of information relating to any of the above matters
- other unethical conduct that is intended to conceal any inappropriate behaviour set out above.

Note: if you suspect abuse of a child, young person or vulnerable adult, you should report it to the relevant council's designated employee for safeguarding in accordance with the councils' joint safeguarding children and vulnerable adults policy.

As a manager, you should become familiar with the council's anti-fraud and corruption policy and its whistleblowing policy so that you are well equipped to deal with allegations if they arise.

The following simple rules should help to ensure that matters are properly handled:

#### Do

✓ be responsive to employees' concerns.

You should encourage employees to voice any reasonably held suspicion. As a manager, you should treat all employees' concerns seriously, confidentially and sensitively. You should reassure the individual that they will not suffer because of concerns raised in good faith.

Note: managers should not deal with allegations relating to the suspected abuse of a child, young person or vulnerable adult. Instead, the manager should direct the employee making the allegation to the councils' designated employee for safeguarding in accordance with the councils' safeguarding children and vulnerable adults policy

#### ✓ note all relevant details

Details should ideally include:

- background details and nature of the suspicions (including relevant names, dates and locations)
- details of the job and areas of responsibility of the individuals implicated
- why the person raising the matter is concerned
- action (if any) taken to date before this concern was raised

Get as much information as possible from the employee reporting the suspicion and encourage them to record this in writing. If the employee has made any notes, obtain these also.

In addition, note any documentary evidence which may exist to support the allegations made, but do not interfere with this evidence in any way.

✓ evaluate the allegation objectively, considering all concerns.

Before you take the matter further, you need to determine whether any suspicions appear to be justified.

Be objective when evaluating the issue. Consider the facts as they appear, based on information you have to hand.

✓ advise the monitoring officer

If you feel that a suspicion is justified advise monitoring the in accordance with the council's whistleblowing policy.

✓ if in doubt, report your suspicions anyway.

If you consider that no further action is necessary, you should still record your decision and inform the monitoring officer of the original notification details and your reasons for taking no further action. The monitoring officer will then help to determine if further action is necessary.

✓ deal with the matter promptly, if you feel your concerns are warranted.

Any delay may cause the council to suffer further financial or reputational loss, or make further enquiry more difficult.

✓ contact the monitoring officer to discuss the report you have received.

✓ contact the monitoring officer to discuss the report you have received.

#### Don't

x ridicule or belittle any suspicions raised by employees.

The council cannot operate an effective anti-fraud and corruption culture or whistleblowing policy if employees are reluctant to pass on their concerns to management due to fear of ridicule or recrimination.

You need to ensure that you give all employee concerns a fair hearing. You should reassure employees that they will not suffer recrimination by raising any reasonably held suspicion.

- × approach the suspect or accuse any individuals directly.
- convey your suspicions to anyone other than those indicated in the council's whistleblowing policy.
- x try to investigate the matter yourself.

Remember that investigations by employees who are unfamiliar with the requirements of evidence are highly likely to jeopardise a successful outcome. They may also alert the suspect and result in the destruction of evidence.

Remember that your primary responsibility is to report the issue and all associated facts to the appropriate employee, wherever possible.

Alternative formats of this publication are available on request. These include large print, Braille, audio cassette or CD, email and alternative languages.

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