

MID KENT AUDIT

WHISTLEBLOWING REVIEW

DRAFT REPORT

January 2016

| | | | |
|---------------------|--------------------|----------------------|---|
| Audit Code | MBC-CON01(15-16) | Service | Audit, Governance & Standards Committee (MBC) |
| Audit Lead | Rich Clarke | Audit Sponsor | CLlr Steve McLoughlin |
| Audit Review | Russell Heppleston | | |



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Summary Report

1. This report represents the first systematic attempt to examine the effectiveness of arrangements at Maidstone BC for raising concerns at work ('whistleblowing'). It was commissioned by Maidstone's Audit, Governance and Standards Committee in September 2015 and subsequently joined by Tunbridge Wells BC and Ashford BC.
2. Encouraging staff to identify and raise concerns is a key component for all organisations in being able to ensure they are consistently well governed and effective. A council's staff are its first and, in some instances, only line of defence against bad or illegal practice. While the Council offers a range of methods for staff to raise concerns, one significant path is the formal Whistleblowing policy which – uniquely – provides a statutory protection to concerned employees shielding them from discrimination as a result of speaking up.
3. In our examination of the policy and practice of whistleblowing across the authorities we conclude that there are a number of encouraging aspects. All three authorities have legally compliant policies, although Maidstone in particular has some way to go to meet the best practice set out by Public Concern At Work. Also, while shallow, there is a broad awareness among staff and Members of the basics and principles of raising concerns and a clearly expressed willingness to not ignore troubling events and behaviours.
4. However, our work identified significant opportunities to update and refresh Maidstone's approach (in particular) and to raise its profile among staff. This will be needed to reduce what is, according to the survey, a significant minority (almost 1/5) of staff who have noted concerns but not raised them.

Next Steps

5. As noted in our audit brief, the scope of the review was not such that we would raise formal recommendations for implementation and follow up. However, there are a number of actions the Council may wish to consider to improve its arrangements:
 - Clearly establish overall responsibility for whistleblowing at an officer level, including amending the constitution and/or audit charter where necessary.
 - Revise and refresh the Whistleblowing charter with reference to Public Concern At Work's identified best practice.
 - The revised charter should in particular give staff clear expectations on the Council's response including investigation approaches and timescales.

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- Undertake relevant training and awareness raising periodically among staff and Members.
 - Report monitoring information to Members on progress towards raising awareness of whistleblowing, quantitative information on concerns raised and headline narrative on what the Council has learned from matters brought to its attention through whistleblowing.
6. Our overall 'recommendation', as expressed in the covering report, is that Members invite officers from Audit, Policy & Performance and Finance via the Corporate Governance Group to consider proposals for refreshing Maidstone's approach to whistleblowing with a view to bringing an implementation report back to the Audit, Governance and Standards Committee.

Independence

7. We are required by Public Sector Internal Audit Standard 1100 to act at all times with independence and objectivity. Where there are any threats, in fact or appearance, to that independence we must disclose the nature of the threat and set out how it has been managed in completing our work.
8. The current whistleblowing charter at Maidstone was originally written by Mid Kent Audit some years ago but adopted by the Council corporately. The charter does not clearly set out ongoing responsibility and such responsibility has never been part of approved audit plans for Mid Kent Audit, so we are satisfied this report does not present a risk of self review.
9. We have no other matters to report in connection with this audit project.

Acknowledgements

10. We would like to express our thanks to all those officers who assisted completion of this work in particular the 173 people who completed the survey and Roger Adley, Susanna Aiano and Adam Chalmers for their assistance in its publication.

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Detailed Findings

11. We completed fieldwork during December 2015 to the agreed objectives and using the tests set out in the final audit brief. We include the audit brief at appendix I.
12. We present the brief as originally agreed since we completed this review in line with original timing and budget expectations. We again thank officers and Members for support provided to enable efficient completion of our work.

Objective 1: Whistleblowing Policy Assessment

13. On initial inspection, the three polices vary significantly. The Ashford and Tunbridge Wells policies are logically and clearly laid out with apparent knowledge of the Whistleblowing Commission’s Code of Practice (‘the Code’), although there is a need to update some internal referencing in the Tunbridge Wells policy.
14. Maidstone’s policy, however, is significantly out of date having not been revised since 2008. Unsurprisingly given its age, the contact numbers and internal referencing is inaccurate. In particular, the extension number given for the Head of Audit (which is the only contact number in the document) is no longer valid. There is also no coherent structure to the document, which misses out key elements of the Code as noted in the table below.

Assessment against the Code’s Written Procedures guidance:

| Code Section ¹ . The procedures should... | MBC | ABC | TWBC |
|---|-----|-----|------|
| 4: ...be clear, available, well-publicised, easily understandable. | – | – | – |
| 5a: ...identify types of concerns, including examples | ✓ | ✓ | ✓ |
| 5b: ... include a list of persons with whom workers can raise concerns. The list should be sufficiently broad. | – | ✓ | ✓ |
| 5c... give assurance that the worker will not suffer detriment unless it is later proved the information was false. | ✓ | ✓ | ✓ |
| 5d... assure workers that his or her identity will be kept confidential if requested unless required by law | ✓ | ✓ | ✓ |
| 5e... assure workers who will address their concern and how including an estimated timing and feedback method. Also that they should report any detriment for having raised a concern and that they are entitled to independent advice. | * | – | – |
| 6 state that the employer will sanction those who subject the worker to detriment for having made a disclosure. | ✓ | ✓ | ✓ |

¹ References are to paragraph numbers in the Code, so not consecutive as the Code also includes explanatory and additional information.

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Key:

| | |
|---|-------------------------------------|
| ✘ | Not meeting Code expectations |
| – | Partially meeting Code expectations |
| ✓ | Meeting Code expectations |

15. We set out below further details on areas where policies do not fully meet Code expectations.

(Para 4) Clear, readily available and well publicised

16. The results of our survey (see objective two) give us reason to believe the procedures are not absolutely clear, readily available and well publicised at any authority. We include more details on the survey findings further on in this report.

(Para 5b) Include a broad list of people with whom workers can raise concerns

17. The Code includes an example list, comprising:

- The worker's line manager,
- More senior managers
- An identified senior executive/board member
- Relevant external organisations

18. Maidstone's policy includes internal directions but, unlike the Ashford and Tunbridge Wells examples, does not provide any examples of external bodies to whom workers might raise concerns (such as Public Concern At Work, the police or appropriate regulators).

(Para 5e) Process of handling concerns

19. The Ashford and Tunbridge Wells policies both set out clear expectations to workers on how and by whom their concerns will be handled, including timescales and feedback. However, neither policy advises workers to raise concerns about any detriments they suffer as a result of having raised a concern.

20. The Maidstone policy includes no details on how and by whom concerns will be investigated nor any indication of timescale or how (or whether) the worker will receive feedback.

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Training, Review and Oversight

21. The Code also includes guidance for how organisations should manage training, review and oversight of Whistleblowing arrangements. Although not directly part of our scope, we have nonetheless evaluated each authority against the Code using the information contained within the policies and our own experience in working with each Council.

Assessment against the Code's Training, Review & Oversight guidance:

| Code Section ² . The employer should... | MBC | ABC | TWBC |
|--|-----|-----|------|
| 7a:... identify how concerns should be raised and recorded | ✘ | ✓ | ✓ |
| 7b:... ensure effective training at all levels | ✘ | – | ✘ |
| 7c:... identify a person with overall responsibility for whistleblowing arrangements | ✘ | ✓ | ✘ |
| 7d:... conduct periodic audits on the effectiveness of whistleblowing arrangements, including feedback from workers and review of incidents identified as a result of raised concerns. | – | – | – |
| 7e:... provide for independent oversight of arrangements (e.g. by an Audit Committee) | ✓ | ✓ | ✓ |
| 8: publish information on whistleblowing in an annual report, including number and types of concerns raised and staff awareness, confidence and trust in arrangements. | ✘ | – | ✘ |

Key:

| | |
|---|-------------------------------------|
| ✘ | Not meeting Code expectations |
| – | Partially meeting Code expectations |
| ✓ | Meeting Code expectations |

(Para 7a) Identifying how concerns should be raised and recorded

22. Maidstone's policy is brief, without any detail on the process by which concerns could be raised. By contrast, Tunbridge Wells' runs through the process of investigation and recording of concerns in some detail, including specific commitments to whistleblowers (such as all concerns will be recorded and an initial response within 10 working days).

² References are to paragraph numbers in the Code, so not consecutive as the Code also includes explanatory and additional information.

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(Para 7b) Ensure effective training at all levels

23. None of the documents in themselves promise or suggest any specific training arrangements. We are aware that, in practice, there are no ongoing counter fraud training programmes for general staff at Maidstone or Tunbridge Wells (although there is some specific ad hoc training for particular staff, such as giving benefits officers information on how to identify fraudulent documents). Ashford's dedicated counter fraud team have embarked upon a series of awareness raising workshops in key at risk departments such as Housing but these are still in the process of rolling out across the Council.

(Para 7c) Overall responsibility

24. Ashford's document names a particular cabinet member as having responsibility at a member level with officer responsibility also assigned to named individuals. At both Maidstone and Tunbridge Wells, although the documents both name contacts who people can approach with concerns, neither names an individual with overall responsibility for setting and monitoring whistleblowing.

(Para 7d) Periodic audits

25. This review constitutes the first attempt to systematically assess the effectiveness of whistleblowing arrangements across the three authorities. It was conducted as a one-off commission rather than as part of a regular process (although assessing effectiveness of counter fraud, in general, is within the remit of internal audit at each authority).

(Para 8) Annual Reporting

26. Members at Maidstone and Tunbridge Wells receive an annual report from the revenues and benefits counter fraud team. However this report is, naturally, focussed on fraud in those areas and so does not comment on whistleblowing. At Ashford, whistleblowing reporting will be within the remit of the counter fraud team but they are yet to present their first annual report reflecting their broader scope.

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Objective 2: Whistleblowing Awareness

Online Survey: Methodology

27. Given the timescales available, we opted for an online survey as the principal vehicle for assessing awareness of whistleblowing policies and attitudes towards whistleblowing and raising concerns generally. Although an online survey has necessary and acknowledged limitations – most notably in only reaching those with regular IT access and skills – we were satisfied it was the most efficient means of reaching a wide audience quickly for a broad overview.
28. The most significant audience outside the scope of the online survey were staff employed at the Council's depot who generally have shared IT access only. We did not ask in the survey for information to identify participants and so do not know how many (if any) responses came from the depot but response rates there were likely to have been low. Consequently we also discussed whistleblowing with management at the depot for their impressions on the depth and extent of knowledge on this topic within their teams. Although information received by this method is limited and largely anecdotal we received no indications that awareness is greater at the depot than elsewhere, if anything the indication was that knowledge and awareness is low.
29. The survey was circulated to all officers and Members and each of the three authorities and available for completion for up to two weeks ending 14 December 2015 (dates of issue varied a little depending on authorities' internal communications). The survey used the *surveymonkey* platform used previously by all three authorities for internal (and some external) surveys. The questions were also trialled within the audit service prior to issue to assess clarity and ease of response which lead to some adaptations.
30. As a means of incentivising responses to an anonymous survey (meaning rewards direct to recipients cannot be offered) we invited respondents to nominate a charity to receive a £25 donation. This appeared to be a popular approach – the overall response rate of 173 completed surveys was significantly ahead of expectations and represents about a fifth of all recipients (noting the limitations in online access mentioned above). On a random draw [The Pickering Cancer Centre](#), a drop-in centre in Tunbridge Wells for cancer patients and their relatives, was selected to receive the donation. We note that, despite it being the only fill-in required question on the survey (which was otherwise tick box) more than 95% of recipients nominated a charity, suggesting this approach did act as a motivator for responses.

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Online Survey: Responses

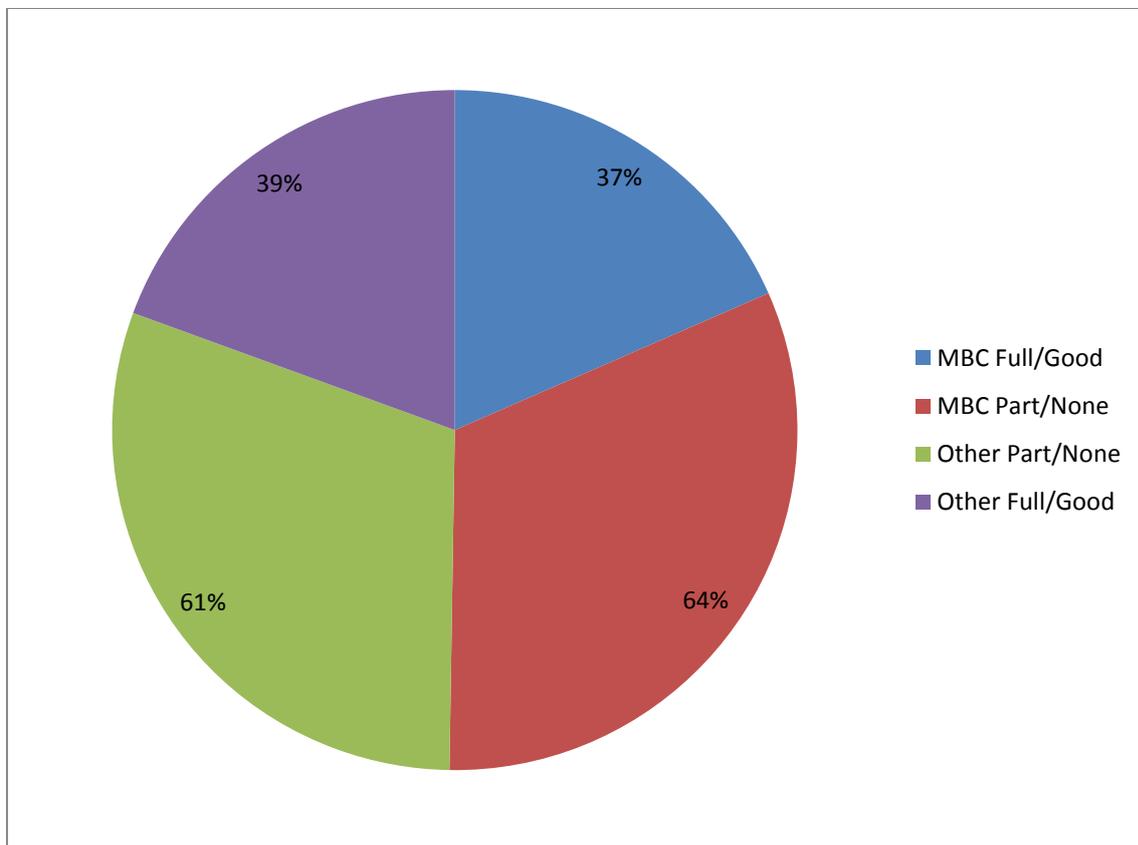
31. The table below shows total responses (thereafter, the graphs/tables show percentages). Note that we have grouped those working in shared services according to which authority they reported being most familiar with. We've also grouped Members and Senior Officers together because of (a) the relatively lower number of responses compared to officers and (b) there was no substantial difference in responses from the two groups.

| Type of respondent | Ashford BC | Maidstone BC | Tunbridge Wells BC |
|-----------------------|------------|--------------|--------------------|
| Member/Senior Officer | 26 | 23 | 16 |
| Officer | 43 | 42 | 23 |
| Total | 69 | 65 | 39 |

Source: Online Survey December 2015

Online Survey: Awareness

32. The chart below shows total levels of awareness recorded by the survey results, Maidstone on the right hand side and non-Maidstone on the left.



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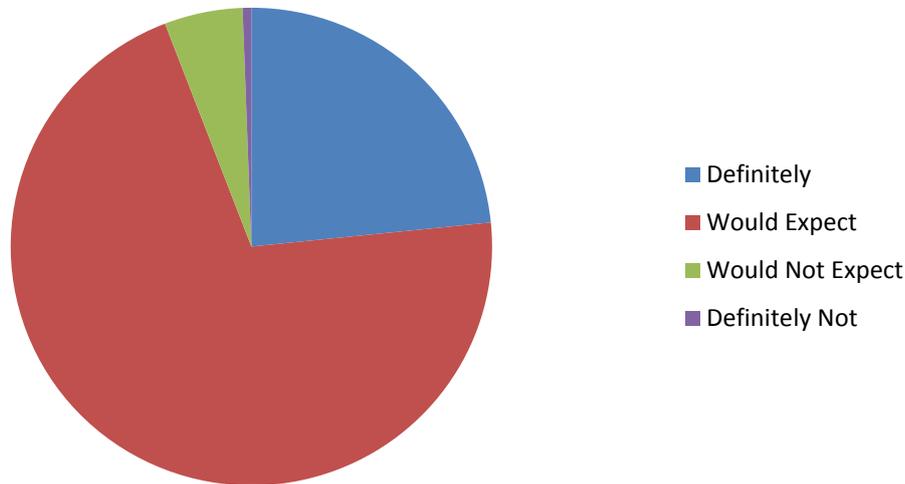
33. Headlines from the chart are that, across mid Kent, overall awareness is about level with **one third** of respondents claiming full or good knowledge of whistleblowing. This does not vary significantly depending on seniority either. Awareness is lower among officers than senior officers (29% against 35% claiming a good knowledge). We also note that there are very low numbers (5% in Maidstone) with no knowledge at all but even lower (a single respondent at Maidstone) claiming full knowledge.
34. For the large majority of respondents – 80% of all responses – whistleblowing is something where they profess at least an awareness of the basics if not the detail.

Online Survey: Knowledge

35. The next question in the survey sought to test that awareness by asking respondents to identify (or guess) what provisions whistleblowing charters contain. This question listed two provisions which are/should be present – contact details and a promise of investigation – one provision which is optional – a warning that disciplinary action could follow malicious false reports – and one that does not – guarantee of anonymity. This final provision (anonymity) is often erroneously cited as a component in whistleblowing policies but actually cannot feature in full since the key part of the legislation aims at protecting whistleblowers from discrimination and you cannot protect someone you cannot identify.
36. On the two definite provisions people knew, or could correctly guess, their presence with **100% of respondents** identifying their inclusion.
37. Regarding a provision regarding malicious false reports, this features prominently in Maidstone's document and is mentioned in the other authorities. In our survey **92% of respondents** knew or believed that such a provision would be present. Maidstone's results here were in line with the average but, in keeping with the overall lack of familiarity with the detail, only **11% of MBC respondents** reports that such a provision was definitely included, most (80%) assuming its presence.
38. However, the question on anonymity perhaps exposed the extent to which respondents were assuming provisions in the charters. The chart below shows responses to this question:

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Does the Whistleblowing Charter Guarantee Anonymity?



39. As noted in the chart, 93% of respondents expect to see a guarantee of anonymity in a whistleblowing charter – something which it cannot provide and be consistent with the legislation. In this aspect, there was no significant difference between authorities or seniority. It is also notable that all of the respondents who professed a detailed knowledge of the whistleblowing charter were mistaken (the only respondent who correctly identified that the charters cannot guarantee anonymity had declared in the first question to have no previous knowledge of whistleblowing).
40. The survey also asked respondents on by which route they would report certain circumstances. Under the Public Interest Disclosure Act there are a defined range of disclosure categories which fall within the protection of the legislation and thus within the scope of a whistleblowing policy. These are:
- A criminal offence (e.g. fraud),
 - Endangerment to health or safety,
 - Risk or actual environmental damage,
 - Miscarriage of justice,
 - Non-criminal law breaking, and
 - Covering up of wrongdoing.
41. Not among the categories of protected disclosures include such matters as workplace inefficiency, bullying or harassment (unless criminal) and safeguarding concerns (unless in present danger).

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42. One finding here is that there appears to be some misunderstanding about the types of concerns the whistleblowing policy is aimed at protecting. Almost half of respondents who would use the whistleblowing route to report cited one or more non-protected disclosures.

Online Survey: Raising concerns

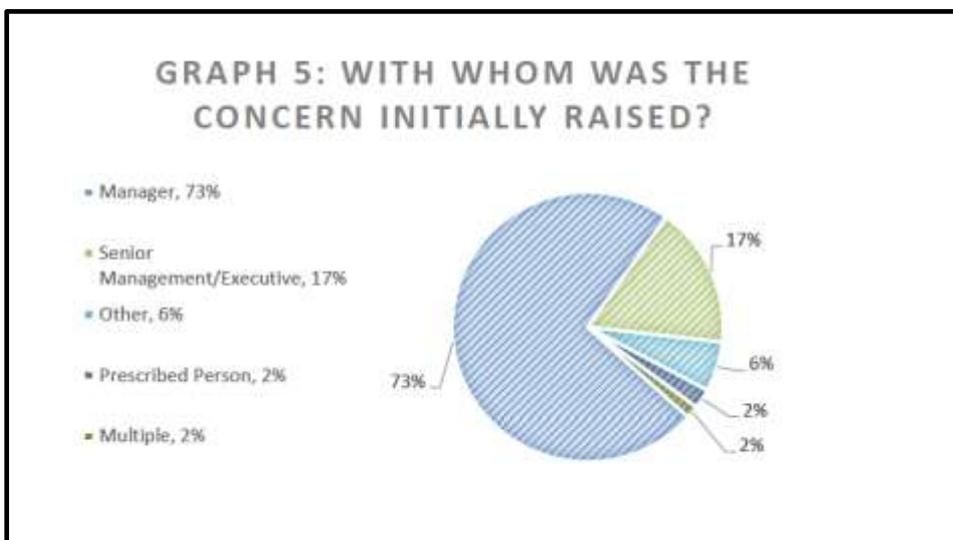
43. However, whatever misunderstanding may exist on where to report, that question did identify a strong willingness to report concerns. **90% of respondents** stated that they would report concerns across all of the listed categories. In response to the question of where people would raise those concerns:

| Reporting route | First Call | Would Report | Would Not Report |
|---------------------|------------|--------------|------------------|
| Line Management | 82% | 91% | 9% |
| Chief Exec/Director | 16% | 72% | 28% |
| Internal Audit | 6% | 62% | 38% |
| Regulators | 3% | 56% | 44% |
| Trade Union | 9% | 50% | 50% |
| Members | 5% | 35% | 65% |
| Media | 1% | 16% | 84% |

Source: Online Survey December 2015. "Would Report" incorporates responses who would take that route first.

44. This pattern broadly correlates with research undertaken by Public Concern at Work in 2015, examining more than 2,500 tribunal referrals:

Public Concern at Work Graph

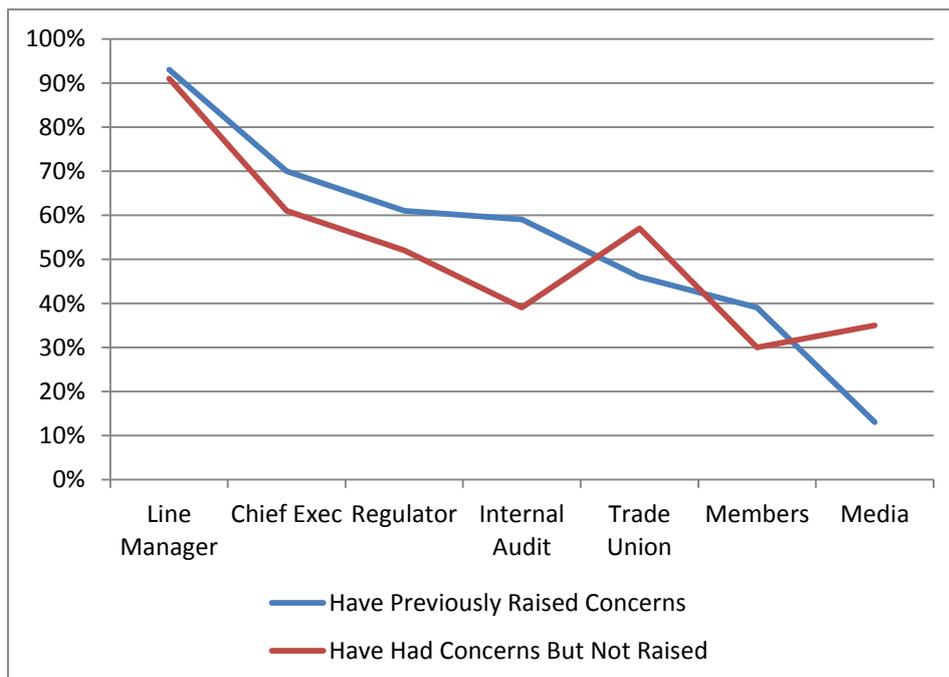


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45. Within the headline data, there were some interesting details from our survey:

- Among people who had reported concerns previously, line manager as first route was even more prominent (95% of these respondents). Conversely, of those who had identified issues but not raised concerns only 70% would go to their line manager first – suggesting that a strong relationship with immediate management is a significant factor in willingness to raise concerns.
- Willingness to report to Directors/Chief Exec showed variance between authorities and grades. For instance, at Ashford only 73% of officers would be willing to report concerns at this level, compared with 97% at Tunbridge Wells (Maidstone 80%). However 100% of senior officers and members would be willing to report here.
- There was no strong difference between authorities on willingness to report to Members, and only limited difference between seniority of officers. 28% of other officers would report concerns to members, against 40% of senior officers. All but one Member reported a willingness to raise concerns with colleagues.
- Willingness to report to the media was low across the board but higher in other officers (19%) than senior officers/members (9%). The highest subgroup on this analysis was those who had identified issues but not raised them (34%)

Looking solely at those who had identified issues of concern, the chart below shows where people with concerns indicated they were willing to raise them:



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46. As might be expected, people who have had concerns but not raised them are less willing generally, but it is interesting to note the only two exceptions to that general rule – trade unions and media – are both external, suggesting one motivating factor is a lack of confidence in internal processes to resolve the matter. This extends in particular to internal audit – the largest single difference between the groups – where 59% of those who have previously raised concerns would be willing to raise, but only 39% of those who have elected not to speak up.
47. The table below shows replies to the question on whether respondents had raised concerns in the past:

| Previously raised a concern | Ashford BC | Maidstone BC | Tunbridge Wells BC |
|-----------------------------|------------|--------------|--------------------|
| Yes | 28% | 25% | 28% |
| No, but could have | 10% | 18% | 10% |
| No, never considered | 62% | 55% | 59% |

Source: Online Survey December 2015.

48. Two immediately apparent results here – firstly that around a quarter of respondents have raised concerns (which is considered further in the next section). However secondly, and in particular at Maidstone, there is a significant group who have identified concerns but not spoken up. It may be that this is related to – as per objective one of this report – Maidstone having the least well developed approach to whistleblowing among the authorities.

Online Survey: Investigating Concerns

49. The first point to note here is that none of the three authorities have had issues raised formally under their whistleblowing policies in the recent past. Whether or not that makes them unusual as local authorities is difficult to say precisely since there is no centrally kept register of concerns that would enable national (or local) comparisons.
50. The charity Public Concern at Work undertook some research in 2015 looking at the results of around 2,500 employment tribunal cases where the plaintiff contended their employer had failed to protect their rights as a whistleblower³. PCaW's research identified a little over 200 such cases from 2011-2013 involving a local government employer.

³ "Is the Law Protecting Whistleblowers: A Review of PIDA Claims"

<http://www.pcaw.org.uk/files/PIDA%20REPORT%20FINAL.pdf>

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51. However, this research represents cases where the whistleblowing policies have arguably failed; in that they have (by the plaintiff's estimation) not offered sufficient protection. Therefore, these 200 or so cases are likely to represent only a small proportion of all the issues raised in local government. Therefore while it is reasonable to say it is unusual for a group of three authorities to have had no concerns raised we cannot say how unusual nor attempt any calculation at how many there 'should' have been.
52. However, our survey did identify that around 25% of respondents – 48 people – had raised concerns at work, presumably by other means. While a slim majority were satisfied with the outcome of their having spoken up (**55%** of respondents who had raised a concern), a significant amount were dissatisfied. Moreover, 25% of respondents who had raised a concern reported that – from their perspective – no action was taken at all.

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Appendix I: Audit Brief

About the Governance Area

Corporate governance is the system of rules, practices and processes by which the Council is directed and controlled. Broader than just financial controls, it is also concerned with how the Council maintains legal compliance and seeks to arrange its operations in order to achieve its objectives.

The [Public Interest Disclosure Act 1998](#) places specific responsibilities on organisations to support individuals who make certain disclosures of information in the public interest, in particular to protect them from subsequent victimisation. Maidstone Borough Council (“The Council”) seeks to fulfil these obligations through operation of its Whistleblowing Charter.

The Council’s [constitution](#) (as recently updated) assigns governance responsibility for monitoring policies on whistleblowing to the Audit Governance and Standards Committee with the ability to delegate that monitoring function to the Head of Audit Partnership. The constitution further assigns responsibility to the Head of Audit Partnership for acting on whistleblowing reports but does not specifically assign overall responsibility for the policy at officer level.

Successful management of its whistleblowing responsibilities will help the Council to:

- Ensure it remains in compliance with its legal obligations,
- Receive information and feedback on its performance to improve its services, and
- Support and encourage staff to speak up on matters of concern.

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About the Audit

This audit is a **corporate governance review** meaning that we will focus on how the Council manages the risks associated with this area, and uses governance to achieve its objectives.

As the review has been commissioned outside of our direct audit plan at specific request of the Audit, Governance & Standards Committee the timescale is somewhat more abbreviated than a more substantial review. For this reason the report will reach conclusions and make comments but not make formal recommendations for implementation nor an overall assessment on our usual scale. However, it is possible that the review will identify scope for subsequent, more detailed, audit work that may make formal recommendations. We have also, since original circulation of the draft, confirmed that Tunbridge Wells and Ashford BCs wish to participate. Consequently we will obtain and provide comparative information to all three councils that may suggest helpful ways forward.

Audit Objectives

1. To assess conformance of the Councils' whistleblowing documentation and formal procedures against the [Whistleblowing Commission's Code of Practice](#) (the Code) as published by Public Concern At Work in 2014.
2. To gather information on awareness and assess effectiveness of the whistleblowing procedures (including investigations into any declarations).

Audit Scope

1. The design and operation of whistleblowing procedures at the named Councils.

Audit Testing

1. Document review comparing the Councils' procedures against the Code.
2. Assess, by means of survey, the level of awareness among Council employees and Members of whistleblowing procedures and processes.
3. Consider whistleblowing disclosures made previously at the Councils and at councils more generally to assess whether they are learning points for the Council.

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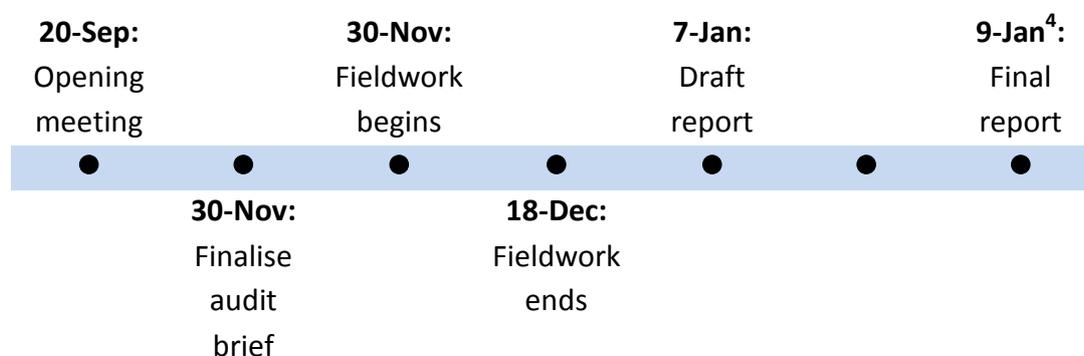
Audit Resources

Based on the objectives, scope and testing identified we expect this review will require **10 days** of audit resources broadly divided as follows:

| Audit Task | Auditor/s | Number of Days (Projected) |
|----------------------|-----------------------|----------------------------|
| Planning | Rich Clarke | 1.5 |
| Fieldwork | Rich Clarke/Ben Davis | 6 |
| Reporting | Rich Clarke | 1.5 |
| Supervision & Review | Russell Heppleston | 1 |
| Total | | 10 |

The review will be funded from the consultancy/contingency days allowance agreed by the then Audit Committee in approving the Audit Plan for 2015/16 at its meeting in March 2015. Any ancillary costs will be met from the audit budget. The £25 incentive for completing the survey was not drawn from Council funds.

Audit Timeline



Council Resources required by audit

| Documents required |
|-------------------------|
| Whistleblowing Charters |

⁴ Fixed date in order to meet Committee papers deadlines

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Appendix II: Survey Questions

We used the *Survey Monkey* platform to undertake the survey, which was emailed to all officers and members at each authority. The survey was open for between ten and fourteen days depending on site but period open did not significantly impact response numbers (90% of respondents replied in the first 5 days of availability). The available responses were presented in a randomly generated order for each user.

- 1. Which council do you work for or represent?**
 - a. Maidstone Borough Council
 - b. Ashford Borough Council
 - c. Tunbridge Wells Borough Council
 - d. Shared Service

- 2. If you work in a shared service, which Council are you most familiar with?**
 - a. Maidstone Borough Council
 - b. Ashford Borough Council
 - c. Tunbridge Wells Borough Council

- 3. Which best describes your position at the Council?**
 - a. Member
 - b. Officer – Manager or above
 - c. Other officer

- 4. Please rate your current knowledge of your Council's whistleblowing charter?**
 - a. Very knowledgeable – I know it in detail
 - b. Somewhat knowledgeable – I know broadly what it covers and where to find more detail
 - c. Vague knowledge – I know it exists but am not familiar with its content
 - d. No knowledge – First I've heard of its existence.

- 5. Which of the following features in your Council's whistleblowing charter?** (each response given the options "definitely features", "uncertain, but would expect to see", "uncertain but would not expect to see" and "definitely does not feature")
 - a. Guaranteed anonymity for whistleblowers
 - b. Protection of whistleblowers from harassment
 - c. Contact details for where to raise concerns
 - d. A promise to investigate all concerns
 - e. A warning that malicious false reports could lead to disciplinary action

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6. If you had a serious concern in any of the following areas, how would you raise it?

(each response given the options “Through the whistleblowing procedure”, “Formally within the council via another route”, “Informally within the Council”, “To an external body”, “Wouldn’t raise such issues”. Respondents could select all that apply)

- a. Inefficient practice/poor value for money
- b. A breach of legal obligation
- c. Concealing information improperly
- d. Bribery or corruption
- e. Other criminal offences
- f. Bullying or harassment
- g. Environmental damage
- h. Safeguarding risk to a child or vulnerable adult
- i. Endangerment to health and safety
- j. Miscarriage of justice

7. If you had a serious concern, who would you raise it with? (each response given the

options “I’d go here first”, “I’d be comfortable reporting here, but not first”, “I’d only report here if I had no response” and “I wouldn’t report a concern here”)

- a. Line manager/Head of Service
- b. Director/Chief Executive
- c. Internal Audit
- d. Trade Union representative
- e. Members
- f. External agencies
- g. Media

8. Have you ever raised a concern at work?

- a. Yes
- b. No, but I’m aware of issues I could have raised
- c. No, never encountered an issue I would want to raise

9. If you have raised a concern, were you satisfied with its handling?

- a. Yes, I got the outcome I wanted
- b. Yes, I didn’t get the outcome I wanted but understand why not
- c. No, although some action was taken I was dissatisfied with the outcome
- d. No, it did not appear that any action was taken