

DRAFT WHISTLEBLOWING POLICY AND MANAGERS' GUIDANCE DOCUMENT

To: **Audit & Accounts Committee**

Meeting Date: **22nd November 2018**

From: **Duncan Wilkinson, Chief Internal Auditor**

Purpose: **To share the draft revised Whistleblowing Policy and Whistleblowing Managers' Guidance documents with the Committee, for their comments.**

Recommendation: **Audit & Accounts Committee is requested to comment on the draft policy and guidance.**

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1. BACKGROUND

- 1.1 At the Audit & Accounts Committee meeting in May 2018, Internal Audit presented a report on the publicity undertaken to increase staff awareness of the new Whistleblowing Policy, which had been updated in September 2017.
- 1.2 Internal Audit were asked to bring a report to Committee later in the year, with information on the number of whistleblowing referrals. Although at the time of the report, no whistleblowing cases had been reported, it was believed that this was likely due to the fact that the launch of the policy had been delayed until the new staff intranet was live. Therefore at the time the report was written, staff had only recently been made aware of the new policy.
- 1.3 Members of the Committee also requested the opportunity to meet with Internal Audit, to discuss the wording of the policy.

2. WHISTLEBLOWING CASES TO DATE IN 2018/19

- 2.1 As at 31st October 2018, six whistleblowing referrals have been recorded by Internal Audit, with outcomes as per the table below:

No. Cases	Outcome
1	Below threshold for investigation.
2	Advice provided to whistleblower.
3	Investigation.

- 2.2 In one instance the investigation is ongoing. The remaining two investigations have been completed. The only significant outcomes from these investigations has been the recommendations that the *Whistleblowing - Manager's Guidance* document should be updated to give staff greater guidance on how to conduct a whistleblowing investigation, and that there should be a clearer process for whistleblowers to raise any complaints regarding the investigation into their concerns. Both of these recommendations have been addressed in the draft updated versions of the Policy and Guidance; see section 3 below.
- 2.3 This is an increase in referrals compared to 2017/18, indicating that the increased publicity has been successful in raising awareness of the Policy.
- 2.4 As per the Whistleblowing Policy, a further report will be brought to the Committee with information on whistleblowing cases and the outcomes of the annual survey, in May 2019.

3. DRAFT REVISED POLICY AND GUIDANCE

- 3.1 In light of comments from Committee members, and the findings of one of the whistleblowing investigations, Internal Audit have revised the Whistleblowing Policy, and conducted a review and revision of the supporting guidance document *Whistleblowing - Manager's Guidance*. These documents may be found at Appendix 1 and 2.

3.2 The key areas of change are as follows:

- Updated key officer contact information.
- Introduction of a clear process for whistleblowers to raise complaints regarding the conduct of the investigation into their concerns.
- Whistleblowing – Manager’s Guidance revised to give more detail on the stages of an investigation, in line with ACAS (Advisory, Conciliation and Arbitration Service) guidance.

3.3 Initial views from Audit and Accounts Committee are therefore invited on the draft documents. The draft policy and guidance will then be updated with any further changes before being shared with senior management and trade unions for their input, and will then come back to the Committee for final approval and implementation.

SOURCE DOCUMENTS

Source Documents	Location
Whistleblowing Policy	Internal Audit Octagon 1, Shire Hall, Cambridge