

Agenda Item	15
Report No	AS/12/20

HIGHLAND COUNCIL

Committee: Audit & Scrutiny Committee

Date: 24 September 2020

Report Title: **The Highland Council, Whistleblowing Policy**

Report By: The Corporate Audit & Performance Manager

1. Purpose/Executive Summary

- 1.1 This report outlines the review of the Council's Whistleblowing Policy and proposals to move management of the policy and processes to the Corporate Audit & Performance Team. The review of the Whistleblowing Policy offers an important opportunity to create an independent, dedicated confidential route for staff to report concerns. The Corporate Fraud Team will lead on this work and whilst not currently formally classed as providing a whistleblowing service has a long track record of confidentially and sensitively investigating staff concerns. The outcome of many of these investigations have secured significant savings for the Council.
- 1.2 The Staff Partnership Forum was consulted on 14 August 2020 on the draft policy with positive feedback on the proposals including support for the policy and procedures being managed within the Council by the Corporate Fraud Team building on their existing work.

2. Recommendations

- 2.1 Members are asked to:
- a) Scrutinise the revised Highland Council's Whistleblowing Policy with a view to recommending its approval and implementation to the next meeting of the Highland Council on 29 October 2020.
 - b) Note the intention to provide an annual monitoring report to the Audit & Scrutiny Committee beginning June 2021.
 - c) Note the plan to review the policy with Trade Unions and with Staff Forum input and report this to Audit & Scrutiny Committee in June 2021 along with any recommendations for change to be scrutinised and recommended to Council for approval.

3. Implications

3.1 Resource implications

There are no resource implications at present as the policy and processes will be managed from within existing resources in the Corporate Fraud Team. However,

this is based on the current level of work and will need to be kept under review to ensure there is no overall detrimental impact on the team's resources should the volume of work increase.

3.2 Community (Equality, Poverty and Rural), Gaelic, climate change/carbon clever implications

There are no community, Gaelic or climate change/carbon clever implications arising from this report.

3.3 Legal and Risk implications

The aim of the Whistleblowing Policy is to ensure that all employees and workers have a confidential and legally compliant route to report concerns. Given the nature of the issues the policy refers to as whistleblowing it is anticipated that resources will be saved and/or litigation avoided as a result of the outcome of subsequent investigations. Once approved the updated Policy will be widely communicated to all staff to ensure that they are aware of its requirements.

4. **Background**

4.1 The Council's Whistleblowing Policy currently sits with HR Team and following discussion it was agreed that the policy and processes be reviewed along with moving management responsibility to the Audit & Performance Team. A review of the policy was carried out during January and February 2020 and was completed just before the COVID-19 situation emerged. For reference the existing policy can be found at:

https://www.highland.gov.uk/peopleandperformance/downloads/file/502/whistleblowing_policy and the reviewed policy is attached to this report as Appendix 1.

4.2 While there had been a number of informal discussions with Trade Unions during development, the first opportunity for formal discussion was at the Staff Partnership Forum on 14 August 2020 and provided useful feedback on the draft. The overall aim of the policy is to encourage employees and workers to step forward and report internally any serious concerns without being harassed or victimised for doing so. Workers are those who work closely for the Council such as agency staff and key contractors.

5. **Approach and Key Issues**

5.1 Initial discussion on the review of the policy centred on establishing an independent, confidential route for employees and workers to report concerns and improve monitoring of the use of the policy. The Corporate Fraud Team already provide such a service for reports of fraud which includes an established confidential telephone number and email address. It is regularly contacted and has a good track record investigating allegations, identifying wrongdoing and taking appropriate action. It is this team's work that is to be built upon to support the revised approach to Whistleblowing. A number of other Scottish Councils also operate the same arrangement.

Use of the Whistleblowing policy will not require the individual to provide their contact details unless they wish to do so, allowing for anonymous reporting of concerns. Reporting concerns can be made through a confidential helpline or email address and an updated online form will also be available and this is provided at **Appendix 2**. The review also looked at the need for appropriate training and induction and increasing awareness of the policy to encourage its use through effective communication and promotion.

5.2 In reviewing the current policy, a range of other Council's policy documents were reviewed to ensure the Council's approach represented best practice. A list of the policies reviewed can be found at **Appendix 3**. In carrying out the review it was identified that only Edinburgh City Council out-sourced their Whistleblowing process with variable annual costs depending on the volume of investigations. The contract provided a fixed value (£18.9K) for hotline provision and a variable amount to the provider depending on the volume of investigations (£11k when last reported for 3 years approx.). It should be noted within this model the provider has the facility to ask Council managers to carry out investigations and report back to them; therefore, the full cost of the approach will be higher. The exchange of services between Councils was also an option highlighted; on assessment each Council will be unable to quantify the work involved in order to formalise an agreement that puts each party on an equal value footing. Overall, the most cost effective option is an internal, independent service provided by the Corporate Fraud Team initially with no additional cost.

5.3 There are many established routes for staff to report a wide range of concerns and these include the Council's Grievance Policy & Procedures, Bullying & Harassment Policy and existing Fraud reporting requirements. Whistleblowing as laid out in the policy relates to specific issues noted below and therefore the policy is often used by exception given the other routes available to staff. Whistleblowing is defined in legislation in relation to malpractice and wrongdoing falling into one or more of the following categories:

- Criminal offences
- Failure to comply with legal obligations
- Miscarriage of justice
- Health and safety danger of an individual
- Damage to the environment
- Deliberate attempt to cover up of any of the above

Information on the legislation can be found at <https://www.gov.uk/whistleblowing>

5.4 It is worth highlighting the independent nature of the work the Corporate Fraud Team which is part of the Internal Audit Section, carry out and this is set out in the Council's Financial Regulations in paragraph 16.1.1 "The Internal Audit Section is managed by the Corporate Audit & Performance Manager and operates in accordance with the Public Sector Internal Audit Standards. The Standards define Internal Audit as "an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations."

5.5 In addition, the Council's Internal Audit Charter paragraph 5.2 states "members of the Executive Leadership Team are required to contact the Corporate Audit & Performance Manager where fraud has occurred or is suspected; where a Whistleblowing complaint suggests that an irregularity has been committed or there are sufficient grounds for concern" This is also made clear in the Council's Financial Regulations at paragraph 2.5.4 which state "All officers must report to their line manager any illegality, impropriety, breach of procedure or serious deficiency in the provision of service. Employees are able to do this without fear of recrimination providing they act in good faith via the Council's Whistleblowing Policy." In moving the management of the Whistleblowing policy to the Corporate Fraud Team the requirement for reporting via line management on Whistleblowing will no longer be a requirement and the confidentiality and independence of the process strengthen. Following approval of this policy the Internal Audit Charter and

the Council's Financial Regulations will be updated to reflect the new policy and give greater clarity on the purpose of Whistleblowing.

- 5.6 There will be a number of benefits to the updated policy and its management by the Corporate Fraud Team. These will include a single point of contact for reporting which allows the overview and reporting of outcomes to the Audit & Scrutiny Committee annually with the first report planned for June 2021. New arrangements will also allow for the annual report to analyse the volume and type of concerns and their outcome and avoid the double handling of issues. Review has already confirmed that the approach is also cost effective.

6. Engagement and Next Steps

- 6.1 The review of the Whistleblowing Policy offers an important opportunity to create an independent, dedicated confidential route for staff to step forward and report internally any serious concerns. The Corporate Fraud Team has a long track record of confidentially and sensitively investigating staff concerns many of which are directly reported out with the current Whistleblowing Policy and the team's work has also secured significant savings to the Council. This track record along with the independent nature of how they operate, and their extensive knowledge of the organisation will provide staff with the confidence to make greater use of the policy. In addition, where necessary, Internal Audit can make use of External Audit's services for investigation.
- 6.2 The Staff Partnership Forum considered the draft Whistleblowing Policy on 14 August 2020 with very positive feedback provided on the draft with the Trade Unions endorsing the approach. To support recent Member debate at the Forum meeting Trade Unions were also asked their opinion of outsourcing the service. The Trade Unions were unanimous on maintaining an internal service and voiced their support for moving management of the policy and processes to the Corporate Fraud Team building on the existing confidential investigation service they already provide. The Trade Unions also asked for an early review of the policy and there was consensus at the Staff Partnership Forum to take this forward with a review now planned for completion by the end of April 2021.

Date: 7 September 2020

Author: Evelyn Johnston, Corporate Audit & Performance Manager,
Tel (01463) 702671
Donna Sutherland, Corporate Audit Manager

Appendices: 1. Highland Council Whistleblowing Policy
2. Whistleblowing online reporting form
3. List of other Councils policies reviewed



**THE HIGHLAND COUNCIL
STAFF WHISTLEBLOWING POLICY**

Date: 20/08/20

Table of Contents

<u>1. INTRODUCTION</u>	1
<u>1.1 What is whistleblowing?</u>	1
<u>1.2 Aim of policy</u>	1
<u>1.3 Who can raise concerns?</u>	1
<u>1.4 Protection and safeguards</u>	2
<u>1.5 Training and awareness</u>	2
<u>2. PROCESS</u>	3
<u>2.1 Reporting a concern</u>	3
<u>2.2 How concerns will be dealt with</u>	3
<u>2.3 Anonymous allegations</u>	3
<u>2.4 Reporting to prescribed persons</u>	4
<u>2.5 Security and retention of information</u>	4
<u>2.6 Monitoring of concerns</u>	4

1. INTRODUCTION

1.1 What is whistleblowing?

Whistleblowing is the term used where an employee or worker suspects malpractice or wrong doing and reports this information to an independent officer (see below) within the Council or an external organisation (see 2.4). Malpractice and wrongdoing falls into one or more of the following categories:

- Criminal offences
- Failure to comply with legal obligations
- Miscarriage of justice
- Health and safety danger of an individual
- Damage to the environment
- Deliberate attempt to cover up of any of the above.

Whistleblowing does not cover:

- Less serious matters where an employee should raise these with their line manager and follow the organisational hierarchy for escalating concerns
- An employee's concerns about their employment which should be addressed in accordance with the relevant HR policy for example bullying and harassment or grievance policy.

1.2 Aim of policy

The aim of this policy is to encourage employees and workers to raise internally any serious concerns they have with confidence that they will not be harassed or victimised for doing so. Workers are those who work closely for the Council such as agency staff and key contractors.

The policy sets out how whistleblowing allegations can be reported and how these will be addressed within the Council.

If you are considering whistleblowing, it is important that you read this policy first and comply with its requirements. A flowchart is appended to assist you in deciding if whistleblowing applies to your situation or whether another route should be followed.

You may also wish to take advice. This can be undertaken internally by contacting the Corporate Fraud Team (see 2.1) for confidential advice or externally by contacting [Protect](#) (formerly known as Public Concern at Work) on 020 3117 2520. If you are a member of a Trade Union, you can also contact your trade union representative for advice.

1.3 Who can raise concerns?

All Council employees and workers who may identify malpractice or wrong doing in their dealings with the Council are encouraged to use the Whistleblowing Service where this fits into one of the categories in 1.1 above.

Employees/ workers are not expected to prove the truth of an allegation but will need to demonstrate there are sufficient grounds for concern, i.e. they have an honest and reliable suspicion or belief that the malpractice or wrongdoing has happened, is happening or is likely to happen.

1.4 Protection and safeguards

All employees are legally protected ¹ in whistleblowing and cannot be dismissed for this reason, provided they:

- are reporting malpractice or wrongdoing as detailed at 1.1 above
- are making a disclosure in the public interest i.e. it is not motivated by personal interests, and
- reasonably believe that the information provided is both true and being reported to the correct person/ organisation.

This legal protection also means that employees cannot be bullied, harassed or victimised for whistleblowing. Failure to comply with this could result in an employee raising a claim with an Employment Tribunal.

Furthermore, the Council will not tolerate harassment or victimisation by employees or workers under its' control and will take appropriate action to protect those who raise a concern either during its investigation; and/ or subsequent to investigation.

Deterring or victimising employees for raising concerns amount to serious misconduct and may lead to disciplinary action.

If employees/ workers make an allegation in good faith and in the public interest, but it's not confirmed by the investigation, the matter will end there. However, where they are found to have made malicious or vexatious allegations, this may lead to disciplinary action.

The Council will strive to protect an individual's identity when they raise a concern and does not wish their name to be disclosed. However, this information may have to be revealed during the investigation process and the individual required to produce a statement as part of the evidence. This may also be compromised in matters of civil or criminal law where anonymity.

1.5 Training and awareness

All staff should be made aware of this policy in accordance with the normal communication arrangements. An electronic version of this policy will also be published on the Council's website.

Managers are responsible for ensuring that their staff have been made aware of this policy and its requirements. In particular this should be included as part of staff induction and any refresher training.

Employees have a responsibility to ensure that they are aware of, and fully understand this policy including the circumstances under which it can be used.

Should any employee receive a whistleblowing concern this should be sent in confidence to the Corporate Fraud Team as detailed at 2.1 below. They should not take any further action on this matter and should not attempt to investigate the matter themselves.

¹ Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998)

2. PROCESS

2.1 Reporting a concern

All whistleblowing concerns will be investigated by the Corporate Fraud Team within the Internal Audit Section which is an independent review function within the Council. Any concerns can be reported to them using one of the following methods, all of which are treated in confidence:

- Telephoning the hotline on 0800 854183
- Completing the online form [here](#)
- E-mailing: Whistleblowing@highland.gov.uk

The more information provided then the easier it is to properly investigate any concerns.

2.2 How concerns will be dealt with

All concerns received will be logged and reviewed to determine the best course of action. This will be dependent upon the nature of the concern. Where these fall into the scope of other existing procedures, e.g. child protection, HR policies, complaints process then these will be referred to the appropriate officers to address. Also, where this falls outside the Council's responsibilities then this will be referred to the relevant external agency e.g. NHS, Department of Work and Pensions (DWP).

The Council will write to the employee/ worker at their home or e-mail address if provided, within 10 working days of receiving their concern. This response will:

- Acknowledge receipt of the concern;
- Indicate how this will be dealt with;
- Provide an estimate of the timescale for providing a final response;
- State whether any initial enquires have been made; and
- Detail if further investigations will be made, and if not, why not.

If any meeting is arranged to seek further information from the employee/ worker, they have the right to be accompanied by a trade union or professional association representative or a colleague.

The Council accepts that employees/ workers need to be assured that the matter has been properly addressed. Subject to legal constraints, we will endeavour to inform how the issue has been dealt with in writing

2.3 Anonymous allegations

The policy encourages employees/ workers to put their names to allegations. If not, it is more difficult to investigate if further information/ clarification is required and this may limit what action can be taken. Also, employees/ workers who remain anonymous cannot be informed of the outcome of the investigation. However, if an individual does wish to remain anonymous then it is helpful if the following is provided:

- A mobile phone number or e-mail address through which contact can be made
- The information requested in the whistleblowing form (see Appendix 2).

Anonymous disclosures are preferred to silence in matters relating to allegations of serious wrongdoing.

2.4 Reporting to prescribed persons

All employees/ workers are expected to report whistleblowing internally and the earlier this is done then the easier it is to address. However, if they feel that the correct course of action is to report it outside of the Council then care must be taken to report to the correct organisation (prescribed person) to ensure adherence to the Code of Conduct for Council Employees and also avoid breaking laws relating to issues such as Data Protection or reporting concerns to the press could lead the employee to being in breach of one or more of these restrictions. Again, advice can be sought before taking this action (see 1.2).

Where information is reported externally this should only be done to the appropriate "prescribed person" where this falls within their remit. This link provides details of the [prescribed person](#) and a brief description of what can be reported. For Council business this is Audit Scotland.

2.5 Security and retention of information

Information provided and/ or established during an investigation is likely to include personal data and so arrangements for the retention, security and destruction of any documentation will be undertaken in accordance with the requirements of the Data Protection Act 2018.

Where a formal investigation is undertaken which culminates in a disciplinary hearing, Police investigation and/ or report to the Procurator Fiscal, then in accordance with the Internal Audit data retention schedule, this information is held for 10 years after completion of the investigation. Any information obtained that is not necessary for the investigation should be securely destroyed.

2.6 Monitoring of concerns

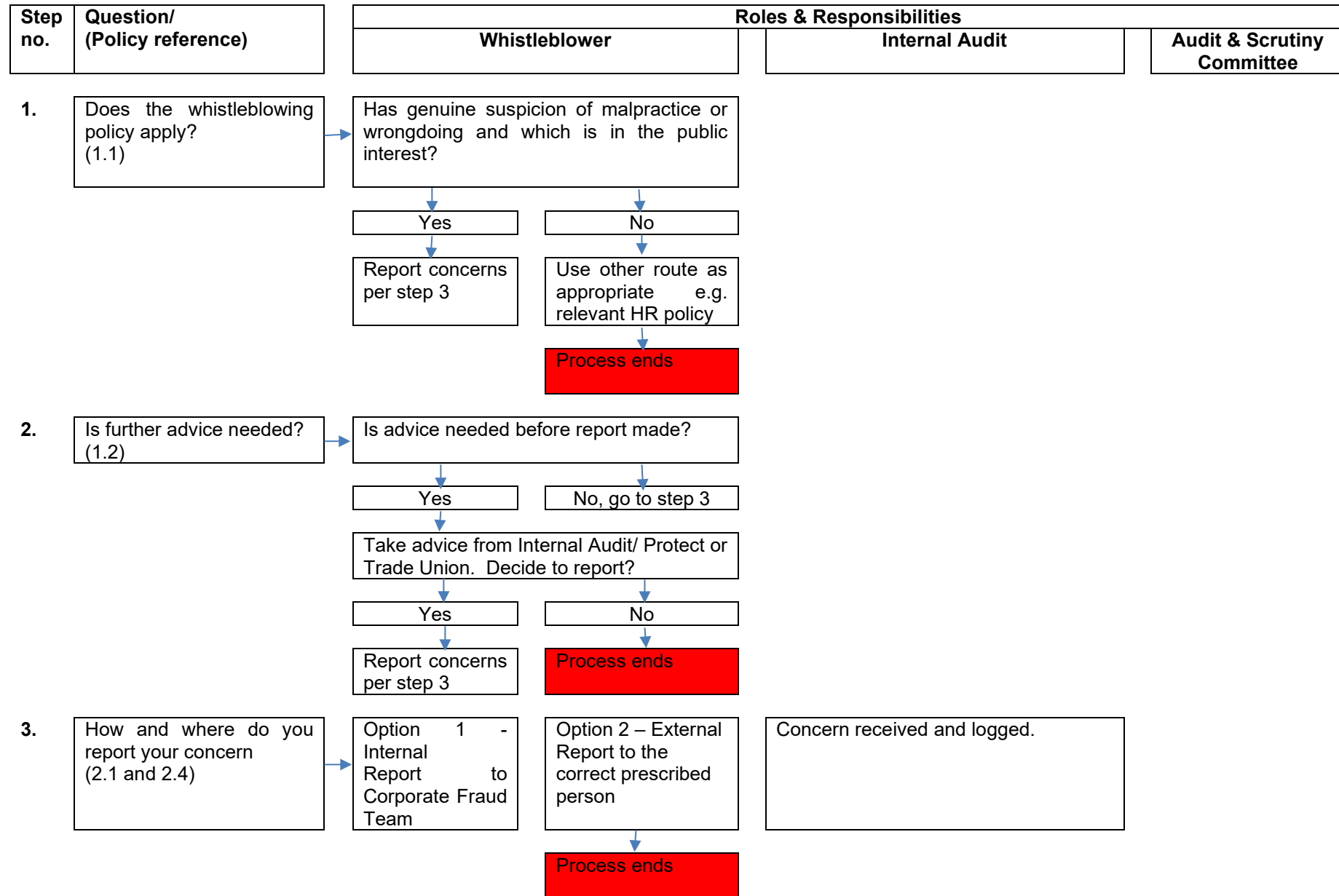
An annual report detailing the number of whistleblowing concerns received and outcomes will be provided to the Audit and Scrutiny Committee. This information will be anonymised so that employees/ workers cannot be identified and will not contain any confidential information.

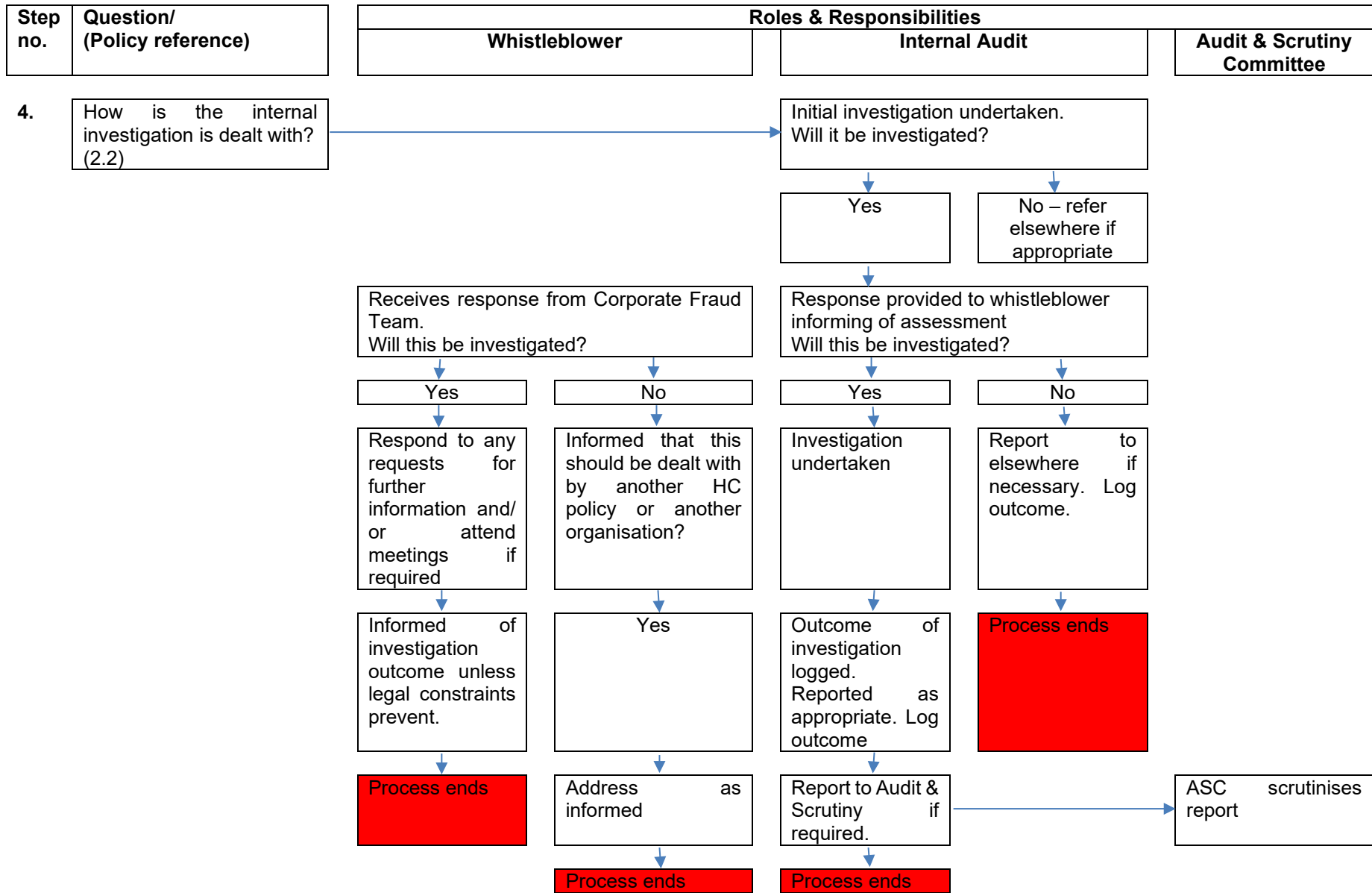
The aim of this report is to ensure that there is appropriate Member scrutiny and to provide assurance that:

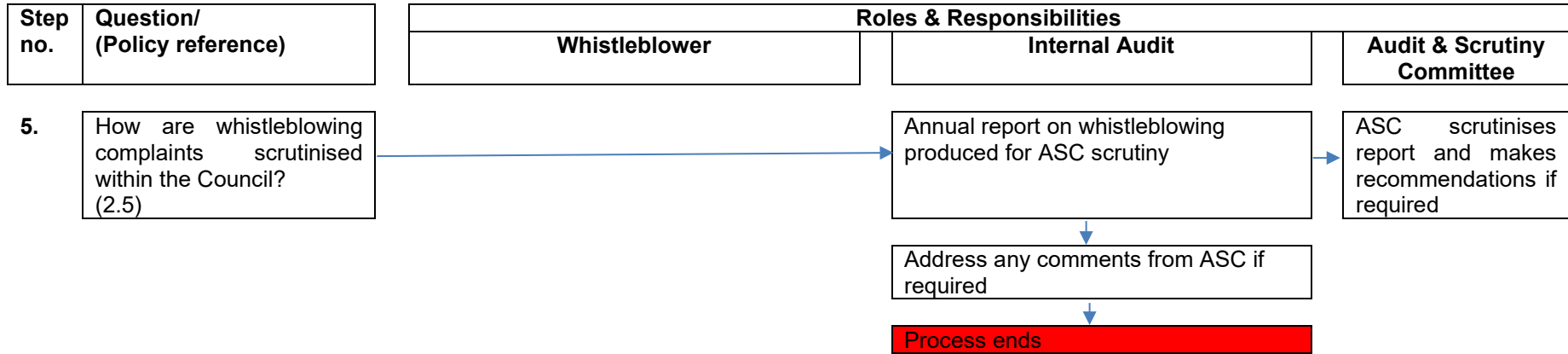
- The Council, Service or team learns from any mistakes and that appropriate action has been taken to address these to ensure they are not repeated, and
- All whistleblowing complaints received have been addressed in accordance with this policy and in a consistent matter.

Where an investigation identifies control weaknesses and/ or fraudulent activity, this information will be reported to the Committee in the normal manner by way of an Internal Audit report.

Guide to whistleblowing process







Whistleblowing Form

Appendix 2

This form is to assist you in reporting of any wrongdoing or malpractice such as:

- criminal acts e.g. stealing from the council or its service users, abuse of service users
- the improper use of council or other public funds, any other financial irregularity, improper use of council assets such as equipment (including IT), vehicles or buildings
- bribery i.e. payment for favours or to influence decisions or any other corrupt activity
- a failure to comply with a legal obligation e.g. a statutory duty to provide a certain level of care
- an action or a failure to act which endangers health or safety or damages the environment
 - the concealment of information about any of the above.

Please try to answer the questions below. You may not be able to answer them all but give as much information as you can as this will be valuable to any investigation.

1 Who Is committing the wrongdoing?

First Name

Surname

Address

Any other relevant information about this person

If more than one person is involved, please give details about them

[Show Additional Person 1](#)

First Name

Surname

Address

Any other relevant information

[Show Additional Person 2](#)

First Name

Surname

Address

Any other relevant information

[Show Additional Person 3](#)

First Name

Surname

Address

Any other relevant information

2 Details of the wrongdoing

What is happening/ happened? When and where did it happen/ is happening? *

Please describe any vehicle(s) involved e.g. registration number, make, model and colour

Please give any other details that you think are relevant

If you have any supporting documentary evidence, please attach a scanned copy. Alternatively, it can be sent by letter marked 'PRIVATE AND CONFIDENTIAL' to the Corporate Fraud Team, Glenurquhart Road, Inverness, IV3 5NX

3 Your Details

This section is optional - you do not have to complete it, but it will help us if we need to contact you to seek further information about the investigation. All the information you provide will be assessed and the most appropriate course of action undertaken. This could include passing the information to another organisation, including the Police.

Are you a Highland Council employee or worker?

Do you wish to remain anonymous? *

Title

First Name

Surname

Address Line 1

Address Line 2

Town

Postcode

Contact details:

Email

Telephone number

Please tick this box to confirm that you have read and understood the Whistleblowing Policy

Thank you for your help

No.	Council Name	Electronic link to Whistleblowing Policy	Internal/ External	Comments
1	Aberdeen City	https://committees.aberdeencity.gov.uk/documents/s33984/Whistleblowing%20Policy-Procedure.pdf	Internal)	-
2	Aberdeenshire	https://arcadialite.aberdeenshire.gov.uk/wp-content/uploads/2011/04/WhistleblowingPolicy.pdf	Internal	Policy to be updated to include central record of cases and outcomes reported annually.
3	Angus	https://www.angus.gov.uk/sites/angus-cms/files/2019-07/Whistleblowing%20Policy_2.pdf	Internal	Records each report and outcome of investigation.
4	Argyll & Bute	Not found	Internal	Per Financial Regs – may contact relevant Chief Officer with responsibility for Fraud, S95 Officer or Internal Audit Manager.
5	City of Edinburgh	https://www.edinburgh.gov.uk/directory-record/1146244/whistleblowing-policy	External or Internal	Hotline outsourced to Safecall, can also report internally. Investigations may be undertaken by Safecall or internally.
6	Clackmannanshire	Not found	-	-
7	Comhairle nan Eilean Siar	https://www.cne-siar.gov.uk/Media/CommitteeArchive/2016/12-december/policy-and-resources/agenda/ZE%20Item%2030C%20-%20Appendix%202%20WhistleblowingProcedure.pdf	Internal	-
8	Dumfries & Galloway	Not found	-	-
9	Dundee City	Policy not found but link to online reporting of whistleblowing: https://www.dundee.gov.uk/service-area/corporate-services/corporate-finance/whistleblowing-and-fraud-reporting	Internal	

No.	Council Name	Electronic link to Whistleblowing Policy	Internal/ External	Comments
10	East Ayrshire	Policy dated 2009, cannot find link to current version: https://docs.east-ayrshire.gov.uk/CRPADMMIN/2007%20AGENDAS/CABINET/3%20JUNE%202009/Whistleblowing%20Policy%20-%203%20June%202009.pdf Report detailing amendments to policy in 2016: https://docs.east-ayrshire.gov.uk/CRPADMMIN/2012%20AGENDAS/CABINET/16%20NOVEMBER%202016/Revised%20Employment%20Policies%20and%20Updated%20Policy%20Review%20Schedule.pdf	Internal	
11	East Dunbartonshire	https://eastdunbarton.gov.uk/whistleblowing	Internal	
12	East Lothian	https://www.eastlothian.gov.uk/download/meetings/id/15588/11_whistleblowing_policy	Internal	Provides internal list of whistleblowing officers.
13	East Renfrewshire	https://www.eastrenfrewshire.gov.uk/CHttpHandler.ashx?id=7860&p=0		Anti Fraud and Bribery Strategy but also covers the reporting process.
14	Falkirk	https://www.falkirk.gov.uk/employees/policies/docs/confidential-reporting/Whistleblowing%20policy.pdf?v=201901241542	Internal	
15	Fife	https://online.fifedirect.org.uk/publications/index.cfm?fuseaction=publication.pop&pubid=7EC9BA84-FC37-117C-E618A5082AE8DA26		
16	Glasgow City	https://www.glasgow.gov.uk/index.aspx?articleid=17132	Internal	Also reporting guidance available as well which covers areas such as the reporting process and different types of fraud that may be reported and the information that should be provided. Has similar process for the public to report "whistleblowing" too.

No.	Council Name	Electronic link to Whistleblowing Policy	Internal/ External	Comments
17	Highland	See link at section 4.1 of covering report for current policy	Internal	Policy being revised and updated.
18	Inverclyde	https://www.bing.com/search?q=inverclyde+council+whistleblowing&qs=n&form=QBRE&sp=-1&ghc=1&pg=inverclyde+council+whistleblowing&sc=1-33&sk=&cvid=91A2ADA78B944E0DB79E66089B118D3C	Internal	
19	Midlothian	https://www.midlothian.gov.uk/downloads/download/423/whistleblowing_policy	Internal	
20	Moray	http://www.moray.gov.uk/minutes/data/PR20080902/item7whistleblowingappend.pdf	Internal	Policy dated 2008, no updates found.
21	North Ayrshire	https://www.north-ayrshire.gov.uk/Documents/CorporateServices/HR/whistleblowing-procedure.pdf	Internal	
22	North Lanarkshire	https://www.northlanarkshire.gov.uk/index.aspx?articleid=32246	Internal	
23	Orkney Islands	https://www.orkney.gov.uk/Files/Human_Resources/Whistleblowing_Policy_October_2015.pdf	Internal	
24	Perth and Kinross	Not found	-	-
25	Renfrewshire	Not found – part of code of conduct	-	-
26	Scottish Borders	https://www.scotborders.gov.uk/site/scripts/google_results.php?q=code+of+conduct+for+employees	Internal	Link to Code of Conduct for Employees, whistleblowing is at Appendix 2 of document
27	Shetland Islands	Not found	-	-
28	South Ayrshire	https://www20.south-ayrshire.gov.uk/ext/committee/CommitteePapers2014/Leadership%20Panel/26th%20August/26aug14-LP-Employee%20Code%20of%20Conduct-App1.pdf	Internal	Part of employee code of conduct
29	South Lanarkshire	https://www.northlanarkshire.gov.uk/index.aspx?articleid=32246	Internal	
30	Stirling	https://www.stirling.gov.uk/documents/chief-executive-office/chief-executive-office/whistleblowing-policy-2018.pdf	Internal	

No.	Council Name	Electronic link to Whistleblowing Policy	Internal/ External	Comments
31	West Dunbartonshire	Policy not found but link to online reporting of whistleblowing: https://my.west-dunbarton.gov.uk/AchieveForms/?mode=fill&consentMessage=yes&form_uri=sandbox-publish://AF-Process-ff26fa33-38b6-4b09-9007-195d0e43d977/AF-Stage-c8c5acb6-96ba-42da-85dc-720dcb96a355/definition.json&process=1&process_uri=sandbox-processes://AF-Process-ff26fa33-38b6-4b09-9007-195d0e43d977&process_id=AF-Process-ff26fa33-38b6-4b09-9007-195d0e43d977	Internal	Used by public as well as employees.
32	West Lothian	https://www.westlothian.gov.uk/article/33244/Whistle-Blowing	Internal	Regular reminders are issued through employee information briefings. Have policy, procedure, guidance for employee and guidance for manager.