



# Reporting Professional Standards Concerns and Protected Disclosure Policy (Whistleblowing)

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# **Reporting Professional Standards Concerns and Protected Disclosure Policy**

## **1. Policy statement**

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Cleveland Police is committed to enabling its workers to safely report inappropriate behaviour in the workplace. We will provide a variety of means of reporting such behaviour and a level of support that is appropriate for those concerned to ensure that workers feel protected and valued and have the courage to speak out.

It is important to establish and maintain an open and honest culture which encourages people to report their concerns. Police regulations, Code of Ethics and the police staff council standards of professional behaviour emphasise that officers, staff and others working in policing have a positive obligation to challenge or report improper behaviour.

This policy reinforces the obligation on workers to uphold the reputation of Cleveland Police and maintain public confidence.

All workers should feel that they can report corruption, dishonesty and malpractice openly with the support of colleagues and managers. It is our intention to continue to develop a force culture in which such actions are viewed as the right thing to do. This will be driven by the force values and behaviours.

Cleveland Police will respond quickly and thoroughly to concerns raised acting in a positive manner to ensure that malpractice is not allowed to continue.

## **2. Purpose**

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All those who work in policing are expected to report concerns they may have about wrongdoing or poor or improper practice in the force. Reports should be made at the earliest opportunity. Your concerns do not need to be proven correct, nor is the reporter required to be able to prove anything themselves.

As a police officer or police staff member, it is your duty to report concerns. It is the duty of those to whom we report to ensure that those concerns are properly considered and responded to. The duty to report wrongdoing is laid out in the Standards of Professional Behaviour in Police (Conduct) Regulations 2020 and replicated in the police staff standards of professional behaviour, and for both officers and police staff this is reinforced in the Code of Ethics.

The main aim of this policy is to provide a mechanism that complies with legislative requirements and enables workers at all levels to raise issues of concern regarding wrongdoing and inappropriate behaviour within the workplace. This policy is integral to creating a climate in which workers at all levels feels a genuine obligation to maintain the integrity of the police service by reporting

wrongdoing and is underpinned by procedures that provide direction for all those involved in its deployment.

This policy follows the principles and guidance set out in the College of Policing's Reporting Concerns (2016).

## **Contents**

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<b><u>Section</u></b>	<b><u>Information</u></b>
<b>3.1</b>	<b>What is Whistleblowing?</b>
3.1.1	What type of disclosure count as Whistleblowing?
3.1.2	Do Breaches of Standards and Professional Behaviour count as Whistleblowing?
3.1.3	The Law
3.1.4	Police (Conduct) Regulations 2020 Standards of Professional Behaviour
<b>3.2</b>	<b>Responsibilities</b>
3.2.1	Objectives (Cleveland Police Responsibilities)
3.2.2	Individual Responsibilities
3.2.3	Line Manager Responsibilities
3.2.4	Head of Directorate of Standards and Ethics
3.2.5	Directorate of Standards and Ethics (DSE) Responsibilities
<b>3.3</b>	<b>Reporting</b>
3.3.1	Direct Report to Line Manager
3.3.2	Direct Report to DSE
3.3.3	Confidential Reporting
3.3.4	False allegations made by whistleblowers
<b>3.4</b>	<b>Action and Support</b>
3.4.1	How Cleveland Police will respond
3.4.2	Identifying and acting on whistleblowing disclosures
3.4.3	Support
3.4.4	Inclusion Meeting
3.4.5	Immunity from Proceedings
3.4.6	Reprisals against whistleblowers
3.4.7	Whistleblower evidence at public hearings
<b>3.5</b>	<b>Outcome Evaluation</b>
3.5.1	Feedback and Debriefing

### **3. Underpinning Procedures**

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#### **3.1 What is Whistleblowing?**

Whistleblowing is the term used when an employee passes on information concerning wrongdoing. The wrongdoing will typically (although not necessarily) be something they have witnessed at work.

The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

As a whistle blower you are protected by law – you should not be treated unfairly or lose your job because of your actions.

The Standards of Professional Behaviour in Police Regulations and the Code of Ethics make it clear that the requirement placed on officers and staff to challenge and report improper conduct does not prohibit them from being categorised as a whistleblower and receiving the relevant protection under the law.

Police officers and Police Staff are considered to be “workers” for the purposes of this legislation.

##### **3.1.1 What type of disclosure count as whistleblowing?**

There is a difference between whistleblowing and raising a grievance. For the disclosure to be categorised as a “qualifying disclosure” and therefore, be covered by whistleblowing law, the worker who makes a disclosure must reasonably believe two things.

The first is that they are acting in the public interest. This means that personal grievances and complaints are not usually covered by whistleblowing law.

The second is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- criminal offences (this may include, for example, types of financial impropriety such as fraud);
- failure to comply with an obligation set out in law;
- miscarriages of justice;
- endangering of someone’s health and safety;
- damage to the environment;
- covering up wrongdoing in the above categories.

It does not matter if an individual who raises a concern is mistaken about it. Workers do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and the information they have tends to show malpractice.

### 3.1.2 Do breaches of the Standards of Professional Behaviour count as whistleblowing?

Reporting any breach of the Standards of Professional Behaviour should also be considered a qualifying disclosure if not covered elsewhere. Reporting wider failings by the force to meet its legal obligations to the public, for example ignoring statutory guidance or codes of practice such as PACE, or failing to meet common law obligations such as the duty to prevent and detect crime, would also be considered a qualifying disclosure.

Personal grievances are not covered by whistleblowing law unless your particular case is in the public interest.

For further information please see Cleveland Police Grievance Resolution Policy or Bullying, Harassment and Victimisation policy.

Misconduct must be reported as per the force misconduct procedures

### 3.1.3 The Law

The Public Interest Disclosure Act 1998 (PIDA) was introduced to ensure that information in the public interest was brought to the attention of an appropriate person in order that wrongdoing could be dealt with promptly. The legislation provided statutory protection against victimisation and unfair dismissal to individuals who make 'protected' disclosures in good faith about certain acts of wrongdoing or workplace dangers. These are summarised as:

- Criminal offence;
- Breach of a legal obligation;
- Miscarriage of justice;
- Danger to the Health & Safety of an individual;
- Damage to the environment;
- Deliberate covering up of information relating to the above.

The Police Reform Act 2002 and amendments to the Police (Conduct) Regulations 2020 extended the provisions to police officers.

Legislation covering disclosures was reformed under the provisions of the Enterprise & Regulatory Reform Act 2013 (ERRA) which stipulates disclosures must be in “the public interest” and not simply “in good faith”.

The ERRA also clarified the position on vicarious liability and protects whistleblowers from any detriment at the hands of co-workers as well as their employer. However, if an employer can show they took reasonable steps to prevent the detriment then it will not be held liable for the actions of co-workers.

### 3.1.4 Police (Conduct) Regulations 2020 Standards of Professional Behaviour

This legislation introduced updated Standards of Professional Behaviour to the police service and placed a regulatory obligation upon all police officers to challenge and report improper conduct. Under the Standards of Professional

Behaviour, Police officers who are witnesses are expected to co-operate with investigations, inquiries and formal proceedings. They must participate openly and professionally in line with the expectations of a police officer when they are identified as a witness. Failure to do so may be treated as a breach of the standards.

This standard is explained in greater detail in the Code of Ethics. A breach of these standards can lead to action for misconduct, and in serious cases can result in dismissal.

The Police (Conduct) (Amendment) Regulations 2015 provided that for the purposes of these Regulations, the making of a protected disclosure by a police officer is not a breach of the Standards of Professional Behaviour.

### **3.2 Responsibilities**

All police officers and police staff, including the extended police family and those working voluntarily or under contract to Cleveland Police must be aware of, and are required to comply with, all relevant policy and associated procedures.

The Chief Officer lead for this policy is the Deputy Chief Constable.

#### 3.2.1 Objectives (Cleveland Police Responsibilities)

The main objectives are to:

- Promote a working environment where workers are free from harassment or discrimination from others and to challenge and report inappropriate behaviour;
- Provide an explanation of what is and is not whistleblowing in relation to the law and the organisation;
- Assist those receiving reports of concerns to assess whether the concern should be considered as whistleblowing;
- Provide an explanation of Cleveland Police procedures for handling whistleblowing;
- Encourage confidence in the policy by creating an organisational culture where workers feel safe to raise a disclosure in the knowledge that they will not face a detriment from the organisation as a result of speaking up;
- Increase public confidence in Cleveland Police by demonstrating the highest level of personal and professional standards of behaviour.

#### 3.2.2 Individual's responsibility

If a worker experiences something in the workplace which they perceive to be wrongdoing, it is important that the concern is raised straight away, proof is not required. The worker must, however, have a reasonable belief that disclosing the information is in the public interest before raising a concern.

It is important that workers follow the correct procedure when raising a whistleblowing concern.

The concern should, in most instances, be raised with their line manager who will know how to handle the matter.

There may be certain rare occasions, however, when it would not be appropriate for a worker to raise a concern with their line manager, for example, if the concern:

- may implicate the manager in some way;
- is about a senior manager within the line management chain or somewhere else in the department;
- it's particularly serious and needs to be dealt with as a matter of urgency;
- it is important that the concern is raised with the person best placed to deal with the matter and with whom the employee feels most comfortable.

If it is suspected that the concern may implicate the line manager in some way, then it should be raised with another line manager, or somebody more senior within the line management chain.

### 3.2.3 Line Management Responsibilities

Line Managers have an individual and collective responsibility to take whatever immediate action is necessary to investigate the initial report and preserve any evidence. They also have a duty of confidentiality to the person making the report. They should ensure that:

- A positive message is given to the individual that they are doing the right thing and offer the right level of support;
- The individual is aware that they may be required as a witness in any relevant formal proceedings;
- Confidentiality will be respected throughout any investigation and only those who need to know are made aware of the circumstances;
- Protection against harassment and victimisation is offered immediately via DSE through its capacity to appoint a welfare officer and to consider where necessary, whether or not the parties involved can remain within their current work location, always taking in to account the wishes of the reporting person;
- Actions are taken to provide support to the worker and details are provided to the Investigating Officer.

### 3.2.4 Head of Directorate of Standards & Ethics

The Head of Directorate of Standards & Ethics is responsible for the application of this policy and procedure. The post holders will review annually; seek such reports as are necessary to ensure compliance.

### 3.2.5 Directorate of Standards and Ethics (DSE) Responsibilities

Responsibility to take necessary immediate action should always remain with immediate line managers. However, the DSE should act as a focal point for Professional Standards reporting. The Department will:

- Provide support, guidance and advice at all stages as required unless it is a misconduct investigation;
- As appropriate liaise with local Line Manager/senior Human resources business partners;
- Assist in identifying the method to take the issue forward;
- Direct the command to appoint a welfare officer to support the worker concerned. Where it is not appropriate to seek a welfare officer from the reporting persons command direction will be sought through an alternative means that is most appropriate in the given circumstances;
- Ensure that any covert response is appropriate, necessary, and proportionate;
- Monitor the progress of all cases reported to the Department;
- Compile statistical Data in respect of reported cases for dissemination as required.

Ensure the principles of the policy are complied with and that the worker making the report is kept informed.

## **3.3 Reporting**

### 3.3.1 Direct Report to Line Management

In the first instance you must, unless there are exceptional circumstances, report to a line manager. This enables an immediate response, and feedback can be given directly, especially if the matter is something the line manager can deal with themselves. Line managers can also provide support and guidance throughout the reporting process.

In cases where the breach of professional standards is believed to involve the individual's line manager, or if it is felt more appropriate to make the report to another manager, this may be done. In cases of doubt, advice can be sought from the DSE or other methods included below.

### 3.3.2 Direct Report to Directorate of Standards and Ethics

You may also report to Cleveland Police DSE directly. Such a report will be dealt with by officers and staff experienced in dealing with sensitive and confidential matters.

In cases involving a suspected breach/breach of Information Security, a report must be submitted direct to the information security manager who works within DSE.

### 3.3.3 Confidential Reporting

- Internal Contacts (HR, Unison, The Police Federation, Superintendent's Association, LGBT Chair, staff networks, Wellbeing, Force Chaplain, EDI Team) can and do play a key role. The nature of their role means they have considerable expertise in dealing with confidential matters.
- Anonymous contact via a confidential e mail system (Breaking the Silence) which can be found on the Force's intranet home page and on force mobile devices.
- Crimestoppers - provides a further alternative for the anonymous provision of information relating to criminal activity. The Force would prefer whenever possible for workers to identify themselves when providing information but recognises there are limited occasions when anonymity is sought Crimestoppers will be a valid alternative. Crimestoppers has a dedicated Integrity reporting telephone line number of 0800 111 4444 or the main line 0800 555 111. Crimestoppers can also be contacted online at <https://crimestoppers-uk.org/misc/contact-us/>
- The Independent Office of Police Complaints Conduct (IOPC) Report Line - is a dedicated and secure phone line and email address that enables workers to report concerns about a colleague committing a criminal offence or behaving in a way that would justify disciplinary action in addition to any inappropriate behaviour. The Report Line is open between the hours of 10am and 5pm.

Contact details are:

Phone: 0845 8770061

Email: [enquires@ipccreportline.gsi.gov.uk](mailto:enquires@ipccreportline.gsi.gov.uk)

Reports can also be submitted confidentially via the Office Police and Crime Commissioner (OPCC) office.

If you are unsure about raising a concern, you can get independent advice at any stage of the process. Some organisations which may be able to assist you are your staff association or union. The independent whistleblowing charity Public Concern at Work can be contacted for free confidential advice on 020 7404 6609 or by email at [helpline@pcaw.org.uk](mailto:helpline@pcaw.org.uk).

The options outlined above are not exclusive or exhaustive in allowing workers to make Professional Standards Reports.

In all instances, it is essential that the initial response is positive, robust and supportive. Additionally, all reports received will be treated in the utmost confidence whilst providing assistance to the individual concerned to make the report in the most appropriate way.

### 3.3.4 False Allegations made by whistleblowers

Making a deliberately false allegation against another worker is dishonest and could amount to perverting the course of justice where it relates to a criminal matter.

A protected disclosure must, in the reasonable belief of the whistleblower, tend to show that misconduct or malpractice has occurred. Deliberately false allegations will never be protected disclosures and may be assessed as amounting to gross misconduct.

## **3.4 Action and Support**

### 3.4.1 How Cleveland Police will respond

Cleveland Police is committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly, sensitively and professionally.

All investigations will be conducted sensitively and confidentially, as quickly as possible under this procedure. Cleveland Police cannot guarantee that the outcome will be as you may wish but the matter will be handled in accordance with whistleblowing procedures.

Once DSE or the Counter Corruption Unit (CCU) have been approached about a possible concern they will formally acknowledge receipt of the concern directly to the reporting person. If the report is an anonymous report, DSE will seek to make contact with the individual.

A case conference between DSE, HR and legal services will be held to confirm that the correct procedures are in place and confirmation that the disclosure is a “protected disclosure”

A meeting with the worker will be arranged with DSE to consider how the matter should be taken forward. The meeting may be via telephone, MS Teams or in person. A whistleblowing report may result in an internal enquiry or a formal investigation and this will be explained to you in the meeting. You will also be told who will be dealing with the matter.

It will also be decided at the meeting that the matter should:

- Be referred as misconduct;
- Be referred as a grievance;
- Have no further action taken.

After the meeting, DSE will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. In some circumstances, external investigators may be brought in by DSE, where necessary. DSE will endeavour to complete investigations promptly and in any event within a reasonable time.

DSE will update you on the progress of your concerns and this will usually be within 28 days of it being raised. In the event of a formal investigation, you will receive sufficient information about the progress and outcome of any investigation to explain to you how your concerns have been dealt with and what stage they are at.

Throughout any investigation, you will still be expected to continue your duties/role as normal unless deemed inappropriate. DSE and HR will work with you to understand any concerns that you may have.

After receiving a report, Cleveland Police will record the information and this will be retained confidentially, including records of meetings, any investigations or enquiries and outcomes.

Upon conclusion of an investigation into a report or enquiry into your concerns, DSE will share any actions or learning outcomes within the wider organisation. In all circumstances DSE will seek to keep specific details about you confidential. It is important to note that anonymity cannot be guaranteed in all circumstances (for example, where a disclosure reveals criminal conduct or misconduct that results in formal proceedings then anonymity may not apply or be possible).

#### 3.4.2 Identifying and acting on whistleblowing disclosures

If a concern is reported to you, you should take the matter seriously and provide reassurance and support to the worker member who has raised the concern that the disclosure will be dealt with confidentially where possible.

You should make a record of the disclosure and consider whether the issues raised amount to whistleblowing or whether they amount to a personal grievance, which would not amount to whistleblowing and therefore, should be dealt with under the Grievance Resolution policy or the Bullying, Harassment and Victimisation policy.

If you consider that report amounts to whistleblowing a CCU referral must be completed (C0202), where DSE will consider the most appropriate investigating officer.

#### 3.4.3 Support

Reporting a concern can be a stressful process, and it is essential that support mechanisms are in place for those who decide to come forward. The DSE will be responsible for ensuring appropriate support is provided to those who come forward. Where someone comes forward, we will value their action.

Upon receipt of a report, DSE will appoint an appropriate welfare officer to support the worker concerned. Where it is not appropriate to seek a welfare officer from the reporting persons command direction will be sought through an alternative means that is most appropriate in the given circumstances. Wellbeing services are also available to provide advice, information and support to managers dealing with such issues.

Where the person reporting wrongdoing wishes, and where confidentiality provisions allow, they should be kept updated on the progress of any investigation by the appointed welfare officer.

In addition to consultation at key stages, the investigating officer must also keep a reporting person updated with the progress of an investigation triggered by their report. Updates may include information about the stage reached in the investigation, what has been done, what remains to be done, together with timescales and, where it cannot compromise the investigation, a summary of any significant evidence obtained.

Managers at all levels must be aware of the importance of provision of such support to workers who make a report of concerns. During the feedback and debriefing process which should be held at the conclusion of any investigation, the level of managerial support will be subject of discussion and assessment.

#### 3.4.4 Inclusion Meeting

In any investigation into a suspected breach of professional standards that has arisen as a result of a worker reporting the matter consideration should be given to arranging a meeting between the Investigating Officer and the respective Line Manager.

The purpose of this meeting is to inform the manager of the existence of the investigation and determine appropriate support. The Investigating Officer is responsible for arranging the meeting.

#### 3.4.5 Immunity from proceedings

The actions of a worker in making a protected disclosure should not result in disciplinary action being taken against them.

This does not confer complete immunity from disciplinary action in respect of any other aspect of the whistleblower's behaviour, for example if they were involved in the misconduct they reported, or any other misconduct.

Minor breaches of procedure and minor breaches of the Standards of Professional Behaviour or the Code of Ethics identified as a result of the officer/staff member coming forward will be dealt with proportionately. The fact that they have self-reported minor issues in order to identify more serious matters will be taken into account when considering how best to address this.

Police Regulations do not confer immunity for any failure by the whistleblower to challenge or report the reported misconduct at the time. Such immunity may be appropriate in some circumstances but the length of time that has passed, and any harm caused by not reporting at the time, would need to be considered.

### 3.4.6 Reprisals against whistleblowers

A reprisal against a whistleblower could take the form of a deliberately false allegation, or a level of disciplinary action that is clearly more serious than that taken in relation to others who commit the same misconduct. Reprisals could also be in the form of intimidation, bullying, isolation, personnel matters such as staff moves and promotions and any other adverse treatment.

A worker who knowingly takes action as a reprisal against another worker who has made a protected disclosure, or their family members or other close associates, should be considered to have breached the Standards of Professional Behaviour.

Such a breach would constitute a recordable conduct matter. The protected disclosure must have been made before the reprisal took place and the officer must have known about the protected disclosure and acted deliberately to cause detriment to the worker who made the disclosure.

This should not prohibit allegations made against whistleblowers and being investigated. However, where an officer who has made a protected disclosure is subsequently subject to a contested allegation, the possibility of a reprisal should be part of the consideration at the 'case to answer' decision, the severity assessment and at any subsequent disciplinary proceedings, once all the evidence is available.

Counter allegations may make it difficult to distinguish between an officer reporting or addressing wrongdoing, and an allegation or action taken as a reprisal. Further investigation may be required when considering such cases to determine whether there is evidence of a clearly aggrieved party and perpetrator. It will not always be the case that the first to report a reprisal is the victim.

There may be some reprisals that would constitute a criminal offence. This could be due to the seriousness of the reprisal or where a whistleblower is a witness to a criminal matter, and an attempt is made to intimidate them.

An allegation of a reprisal against a whistleblower should be assessed and where justified, recorded and investigated in the same way as any other conduct matter, based on the available evidence. It is the duty of the reporting person to bring this matter to the attention of their line manager/DSE immediately so any concerns can be addressed at the earliest opportunity.

### 3.4.7 Whistleblower evidence at public hearings

Disciplinary hearings against police officers are normally held in public, disciplinary proceedings against police staff are held in private. Officers and staff who report misconduct may subsequently be required to give evidence at misconduct hearings held in public.

Police Regulations give the person chairing or conducting misconduct proceedings a broad discretion to exclude any person (including the media) from

all or part of the proceedings. The person chairing or conducting the proceedings also has a duty under the regulations to require public attendees (including the media) to withdraw where evidence will be given that should not be disclosed to such attendees under the harm test set out in Police Regulations.

The person chairing or conducting the proceedings should consider whether the harm test applies and, if not, whether it may be necessary to use the discretionary power in relation to prevent the disclosure of information about the identity of a police witness. This consideration should take place for all police witnesses, but may be particularly relevant in certain circumstances, for example if a police witness is operating in a covert or firearms role where their identity should not be made public, or if they are the victim of the alleged misconduct and it is sexual in nature.

Therefore, whistleblowers should be reassured that careful consideration would be given to their whistleblowing status and the protection that should be afforded to them should they be required to give evidence at proceedings.

### **3.5 Outcome Evaluation**

Outcomes will reflect specific objectives and be measured against these objectives on a routine annual basis by the Head of Directorate of Standards & Ethics (DSE). Measurement will include analysis of any quantitative / qualitative data to identify themes/trends and enable prevention measures to be put in place and lessons to be learnt. This will also focus on reflective practices and individual learning.

In general terms the policy should:

- Ensure compliance with legislative requirements;
- Raise level of professionalism.

If an individual is not comfortable reporting their concern to DSE, they can always discuss it and make a report via a colleague. In the interests of everyone, this must be treated confidentially. Individuals may also use the confidential reporting arrangements.

Confidential reporting is available around the clock, every day of the year. An individual may choose to report via the confidential reporting route on an anonymous basis by utilising Break the Silence email system.

Cleveland Police hopes that all workers will feel able to voice their concerns openly under this policy. Although a concern may be made anonymously, we encourage individuals to put their name to their allegation whenever possible. If this is not done, it will be much more difficult for DSE to protect the individual's position or to give feedback on the outcome of investigations.

Concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. DSE will consider anonymous disclosures at its discretion, taking into account factors such as the seriousness of the issue raised,

the credibility of the concern and the likelihood of confirming the allegation from other sources.

Individuals will generally need to provide the following information as a minimum:

- the nature of the concern and why the individual believes it to be true; and
- the background and history of the concern (giving relevant dates where possible).

If you raise a genuine concern you will not be at risk of losing your job or suffering any form of reprisal as a result. If at any stage you are concerned that you have experienced detrimental treatment, harassment, or victimisation for raising a genuine concern, you should seek advice and you must report it to the appropriate department (i.e. Directorate of Standards & Ethics or HR) immediately.

**Cleveland Police will not tolerate any form of unlawful behaviour towards its staff or workers, nor harassment or victimisation in our workplaces.**

#### 3.5.1 Feedback/Debriefing

At the conclusion of any investigation, a full debrief should take place with the individual who raised the concern. This will provide an opportunity to identify positive and negative aspects of the policy and procedure and make any necessary improvements.

Responsibility for ensuring this takes place should remain with the Investigating Officer who is responsible for reporting issues to the Head of the Directorate of Standards & Ethics.

## **4. Appendices**

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<b>Appendix</b>	<b>Description</b>
1.	Recording workflow

## **5. Compliance and monitoring**

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The Head of Directorate of Standards and Ethics is responsible for the accuracy and integrity of this document. This policy will be continuously monitored, and updated when appropriate, to ensure full compliance with legislation.

The Head of Directorate of Standards and Ethics will review this process to ensure that all aspects are being adhered to in accordance with the framework of this policy.

## 6. Version control

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This policy will be reviewed and updated at least every three years by the owner, and more frequently if necessary.

The Corporate Services Department will ensure this document is available on the Force intranet, including any interim updates.

The following identifies all version changes.

Version	Date	Reason for update	Author
0.1	Jan 2010	Inclusion in Governance Framework	[REDACTED]
1.0	Jan 2010	Published policy	[REDACTED]
1.1	Nov 2012	Policy amended to reflect introduction of PCC, statement only	[REDACTED]
1.2	May 2013	Policy Review	[REDACTED]
1.3	July 2014	Policy Review	[REDACTED]
1.4	May 2016	Policy Reviewed and renamed from Whistle Blowing	[REDACTED]
1.5	June 2016	Further amendments	[REDACTED]
1.6	June 2016	Final version following consultation	[REDACTED]
1.7	August 2017	Review and inclusion of updated regulatory provision	[REDACTED]
1.8	Sept 2017	Change of owner department name	[REDACTED]
1.9	August 2018	Revision to paragraphs 3.2 and 4.2.1 (d)	[REDACTED]
2.0	Mar 2021	Full review of policy	[REDACTED]
2.1	July 2021	Further amends to section for consultation	[REDACTED]
2.2	February 2022	Final amends to policy and formatting incl. deletion of appendix 2. Approval at EMB April 2022.	[REDACTED] [REDACTED]

## Recording and decision making workflow

