



**Item: 4**

**Human Resources Sub-committee: 5 November 2024.**

**Whistleblowing Policy – Review.**

**Report by Corporate Director for Strategy, Performance and Business Solutions.**

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## **1. Overview**

- 1.1. On 24 November 2015, the Policy and Resources Committee recommended approval of the Council's Whistleblowing Policy, replacing the previous Reporting Concerns at Work Policy.
- 1.2. On 7 November 2019, the Human Resources Sub-committee recommended approval of the revised Whistleblowing Policy and Procedure.
- 1.3. As part of the normal cycle of policy review work, a further review has now been undertaken.

## **2. Recommendations**

- 2.1. It is recommended that members of the Sub-committee:
  - i. Approve the revised Whistleblowing Policy and Procedure, attached as Appendix 1 to this report.

## **3. Policy review**

- 3.1. The revisions in the attached Whistleblowing Policy and Procedure, attached as Appendix 1 to this report, are shown as track changes for clarity and are minimal in nature.
- 3.2. The revisions cover the following:
  - Updated job title references for appropriate officers.
  - A corrected reference to the most up to date relevant legislation.
  - Revised contact information for the relevant external bodies.
  - A revised policy review timeframe from 3 years to 5 years, in line with other standard practice with Council HR policies.

- 3.3. In undertaking the review, the input of relevant officers from Legal Services, Internal Audit, and Finance has been sought.
- 3.4. Since the last review by Officers, there has been one concern raised under the Policy with the Chief Internal Auditor. This matter was investigated with no substantive action required.
- 3.5. The Notification of Whistleblowing Concern form is attached as Appendix 2.

**For Further Information please contact:**

Andrew Groundwater, Head of Human Resources and Organisational Development, extension 2253, Email [andrew.groundwater@orkney.gov.uk](mailto:andrew.groundwater@orkney.gov.uk).

**Implications of Report**

1. **Financial** – There are no immediate financial implications arising from this report. Effective whistleblowing arrangements can save the Council money in the long term by minimising the risk of loss through a fraud being perpetrated against the Council and/or legal action being raised against the Council.
2. **Legal** –
  - The rights of employees or workers who undertake work on behalf of the Council to raise concerns is covered by legislation in the Public Interest Disclosure (Prescribed Persons) Order 2014.
  - There are no significant legal implications arising directly from the recommendations contained in this report.
3. **Corporate Governance** – Not applicable.
4. **Human Resources** – The policy meets the requirement to have a policy outlining the routes for employees to raise concerns appropriately. Once approved the updated policy will be made available to staff.
5. **Equalities** – An Equality Impact Assessment has been carried out and is attached at Appendix 3.
6. **Island Communities Impact** - An Island Communities Impact Assessment has been carried out and is attached at Appendix 4.
7. **Links to Council Plan** The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Council Plan strategic priorities:
  - Growing our economy.
  - Strengthening our Communities.
  - Developing our Infrastructure.
  - Transforming our Council.

**8. Links to Local Outcomes Improvement Plan** The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Local Outcomes Improvement Plan priorities:

Cost of Living.

Sustainable Development.

Local Equality.

9. **Environmental and Climate Risk** – Not applicable.

10. **Risk** - Not applicable.

11. **Procurement** – Not applicable.

12. **Health and Safety** - Not applicable.

13. **Property and Assets** – Not applicable.

14. **Information Technology** – Not applicable.

15. **Cost of Living** – Not applicable

### **List of Background Papers**

None.

### **Appendices**

Appendix 1: Revised Whistleblowing Policy.

Appendix 2: Notification of Concern Form.

Appendix 3: Equality Impact Assessment.

Appendix 4: Island Communities Impact Assessment.

**Appendix 1.**



## **Whistleblowing Policy and Procedure**

**November 2024**

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## 1. Introduction

1.1. Employees and those people who work closely with the Council are often the first to realise that there may be something seriously wrong within the Council. However, they may not express their concerns because they feel that speaking up would be disloyal to the Council or to their colleagues. They may fear harassment or that their job may be at risk. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2. The Council is committed to openness, probity and accountability. It expects employees and others with serious concerns about any aspect of the Council's work to come forward and voice those concerns. The Council's employees and those who work closely for the Council, such as agency staff and key contractors, (hereafter called "workers") and as defined in the Public Interest Disclosure Act 1998, have mutual responsibilities of fidelity, support, confidence and trust. This policy lets employees/workers raise serious concerns within the Council rather than overlooking or ignoring a problem, or immediately "blowing the whistle" to the media or other external bodies.

1.3. This Policy is intended to build upon the rights/requirements and protections for employees contained within the Public Interest Disclosure Act 1998, the Employment Rights Act 1996 and the Enterprise and Regulatory Reform Act 2013, and to which reference will be made in the publication of this policy. It does not remove any rights or protection provided by the Acts.

1.4. It is intended that this policy and the act of whistleblowing based on reasonable belief and the public interest is seen as a positive action which can provide valuable information to the Council and helps to ensure it meets appropriate standards of governance and accountability.

## 2. Aims and Scope of the Policy

2.1. This policy aims to:

- Provide ways for employees/workers to raise concerns and receive feedback.
- Inform employees/workers on how to take the matter further if they are dissatisfied with the response.
- Reassure employees/workers that they will be protected from detrimental treatment for "whistleblowing" in good faith and in the public interest.

2.2. This policy covers any concerns of employees/workers as to malpractice or wrongdoing. A concern of malpractice or wrongdoing may be if:

- A criminal offence has been committed, is being committed or is likely to be committed and which may involve reference to the Police.
- There has been a failure or there is likely to be a failure to comply with any legal obligation, and/or
  - A miscarriage of justice has occurred or is likely to occur.
  - Health or safety of any individual has been or is likely to be endangered.

- The environment is being or is likely to be damaged.
- Information on any of the above is being or is likely to be deliberately concealed.

### **Examples of Malpractice or Wrongdoing**

- Fraud.
- Wilful breaches of the Council's [Scheme of Administration](#), [Scheme of Delegation](#), Standing Orders, Financial Regulations or Contract Standing Orders.
- Corruption.
- Offering/promising/giving of a bribe or agreeing to/receiving/accepting a bribe in contravention of the Bribery Act 2010.
- Dishonesty.
- Acting contrary to the Council's Code of Conduct for Employees.
- Criminal activities.
- Creating or ignoring risks to health, safety or the environment.

Please note: The above list of examples is not intended to be exhaustive and there may be other examples of malpractice or wrongdoing which it would be appropriate to consider under this policy.

#### 2.3. Other Procedures.

The Whistleblowing policy is specifically for those types of incidents detailed above. There are other procedures for workplace complaints that members of the public and/or employees may have about the Council which include:

- The Complaints [Handling](#) Procedure which is available to employees as members of the public if in that capacity they have a complaint about service delivery.
- The Dignity at Work Policy if an employee considers that they, or someone else, is being bullied, harassed or discriminated against at work.
- The Grievance Procedure for general work or contractual issues, e.g. dissatisfaction with a decision of a manager, or application of terms and conditions.
- The Corporate Anti-Fraud Policy and Fraud Response Plan for any incidents whereby fraud, or suspected fraud, has occurred.

## **3. How to raise a concern**

3.1. For relatively minor issues employees/workers should normally raise concerns with their line manager or, failing whom, another senior manager. Section 4 details how the concern will be dealt with.

3.2. In general, the whistleblowing procedure is expected to be used for more serious and sensitive issues or exceptionally serious issues (e.g. corruption, fraud, bribery, unlawful acts) and the first step will be to raise the concern with the Chief Internal Auditor who will then raise the matter with the relevant Corporate Director (unless he/she, or senior management collectively, is the subject of the complaint in

which case the Chief Executive should be informed, or failing that the Council's Monitoring Officer, who is the Head of Legal and Governance). A standard form for raising a concern is available.

3.3. The Chief Internal Auditor, the Corporate Director for Strategy, Performance and Business Solutions or the Council's Monitoring Officer are appropriate persons to receive complaints under this Policy either against or which involve the Chief Executive. Where the concern is about the Internal Audit section the Council's Monitoring Officer should receive the complaint.

3.4. Whistleblowing procedures do not include raising the matter with Elected Members or the Media. This procedure provides employees with appropriate routes for raising a whistleblowing concern in which employees can have trust and faith that their concerns will be handled with care and due diligence. Raising such concerns with Elected Members or the media is a potential breach of the Employee Code of Conduct and therefore may result in disciplinary action if proven.

3.5. Whenever any matter arises which involves, or is thought to involve, irregularities concerning finance, assets or property in the exercise of the function of the Authority, the Chief Internal Auditor will immediately notify the Head of Finance.

3.6. This Policy does not preclude disclosure to prescribed regulators or bodies or persons for example Health and Safety Executive and the Scottish Environment Protection Agency, or the Local Government Ombudsman in appropriate cases.

3.7. It is preferable if concerns are raised in writing and a standard form, appended to this policy, is available for use. The background and history of the concern, giving names, dates and places where possible, should be set out and the reason why the individual is particularly concerned about the situation. Those who do not feel able to put their concern in writing can telephone or meet the appropriate officer. The earlier the concern is expressed, the easier it is to take action.

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

3.9. Employees should not attempt to investigate the matter themselves. This policy and procedure provides an appropriate means to raise whistleblowing concerns and is intended to protect all parties involved in such a process.

3.10. An individual may invite his/her trade union representative or another work colleague to raise a matter on their behalf, again preferably in writing.

#### **4. How the concern will be dealt with**

4.1. The action taken by the Council will depend on the nature of the concern. There will be a range of possible actions, including:

- Having the concern investigated internally.



- Referring the concern to Internal Audit.
- Referring the concern to the Head of Finance.
- Referring the concern to the Police (where there is potential or suspicion that a criminal act may have been undertaken).
- Referring the concern to the External Auditor.
- Placing the concern as the subject of an independent inquiry.

4.2. Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of other, existing, procedures (e.g. child protection or dignity at work issues) will normally be referred for consideration under those other procedures in consultation with the appropriate officers. Some concerns may be resolved by agreed action with the complainant without the need for investigation.

4.3. Within 14 calendar days of a concern being received, the Chief Internal Auditor will write to the employee/worker (at his/her home address) who raised the issue:

- Acknowledging that the concern has been received.
- Indicating how the matter is to be dealt with.
- Giving an estimate of how long it will take to provide a final response.
- Saying whether any initial enquiries have been made.
- Indicating whether further investigations will take place, and if not, why not.

4.4. The amount of contact between the body or person considering the issues and the individual raising the concern, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the individual.

4.5. When any meeting is arranged the employee will have the right, if they so wish, to be accompanied by a trade union representative or a work colleague.

4.6. The Council accepts that employees need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, they will receive information about the outcomes of any investigations.

## 5. Alternative methods of taking forward a complaint

5.1. This policy is intended to provide employees/workers with a way to raise concerns about the Council, within the Council. Concerns should always be raised within the Council in the first instance. The Council hopes this will satisfy employees/workers. However if the individual feels it is right to take the matter outside this process, they have the right to raise a relevant concern with one of the prescribed persons listed in the Schedule to The Public Interest Disclosure (Prescribed Persons) Order ~~2014~~. This Schedule includes:

- The Council's External Auditor.
- Relevant professional bodies or regulatory organisations.
- The Health and Safety Executive.

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- The Police.
- Audit Scotland.

- [Scottish Public Services Ombudsman](#)

**Deleted:** Commissioner for Local Government Administration (The Ombudsman)...

Employees/workers can also contact the [Care Quality Commission](#) Helpline for the NHS and Social Care where relevant – Telephone 0800 724 725.

**Deleted:** Scottish Government

5.2. If employees/workers do take the matter outside the Council, they need to ensure that in making a disclosure, they do not commit an offence under law. The Secretary of State may prescribe bodies e.g. Audit Scotland, or persons to receive disclosures of concerns of malpractice or wrongdoing. Such a disclosure will be protected provided it is made with a reasonable belief that the disclosure is in the public interest, that the relevant failure falls within any matter in respect of which that body has been prescribed and that the information disclosed is substantially true.

5.3. Disclosures in other cases may be protected if made in the public interest with reasonable belief in its truth, not made for personal gain, and if the worker believed he/she would be subject to detriment for disclosure; or believed that the evidence would be destroyed or he/she had made a disclosure of substantially the same information to the employer or prescribed Person; or that they have already made a disclosure and it has not been addressed.

5.4. Exceptionally serious malpractice may mean bypassing other means of disclosure if in all the circumstances it is reasonable to make the disclosure in the public interest, for no personal gain, in the belief that the substance/allegations are substantially true.

## 6. Safeguards and protection

### 6.1. Detrimental Treatment.

The Council recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Council will not tolerate harassment or victimisation e.g. by colleagues, managers or other workers under the Council's control and will take action to protect employees/workers when they raise a concern that is in the public interest; either during its investigation; and/or subsequent to the investigation.

If an employee/worker is already the subject of disciplinary or redundancy procedures or is using the grievance, or Dignity at Work, or similar internal process, then those procedures will not necessarily be halted as a result of the "whistleblowing".

### 6.2. Confidentiality.

The Council will do its best to protect an individual's identity when he/she raises a concern and does not want their name to be disclosed. It must be appreciated however, that the investigation process may reveal the source of the information and a statement by the individual is likely to be required as part of the evidence.

In such circumstances, it is unlikely to be possible to maintain absolute confidentiality on the source or identity of the concerned person.

### 6.3. Anonymous Allegations.

This policy encourages employees/workers to put their names to allegations. Concerns expressed anonymously are much less powerful, and whether they will be followed up is at the discretion of the Council, represented by the officer who has received the allegation (namely the Chief Internal Auditor) in consultation with the Monitoring Officer and any other relevant senior officers. In exercising this discretion the factors to be taken into account will include:

- The seriousness of the issue raised.
- Whether the allegation/expression of concern is worthy of belief.
- The likelihood of confirming the allegation from attributable sources.

### 6.4. Allegations Which Cannot Be Confirmed or Are Untrue.

If employees/workers make an allegation in good faith and in the public interest, but it is not confirmed by the investigation, the matter will end there. If, however, it is found that an individual has made malicious or vexatious allegations, disciplinary action may be considered and implemented.

## 7. Contractors

7.1. Key contractors will be informed of this policy and will be encouraged to use it.

## 8. The Responsible Officer

8.1. The Chief Executive has overall responsibility for the maintenance and operation of this policy and Internal Audit will maintain a record of concerns raised and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Council through the Monitoring and Audit Committee.

## 9. Other sources of help and information

9.1. Further information on whistleblowing and the Public Interest Disclosure Act can be found at the following useful contacts:

[Protect, The Green House, 244-54 Cambridge Heath Road, London, E2 9DA.](#)

Telephone: 020 3117 2520.

<https://protect-advice.org.uk/> [Audit Scotland, 4th Floor, 102 West Port, Edinburgh, EH3 9DN](#)

Telephone: 0131 625 1500

Email: [correspondence@audit-scotland.gov.uk](mailto:correspondence@audit-scotland.gov.uk).

[www.audit-scotland.gov.uk](http://www.audit-scotland.gov.uk).

**Deleted:** Public Concern At Work

**Deleted:** Third Floor, Bank Chambers, 6-10 Borough High Street, London, SE1 9QQ.

**Deleted:** Email: [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk) [www.pcaw.org.uk](http://www.pcaw.org.uk)

**Deleted:** ¶

**Deleted:** 110 George Street, Edinburgh, EH2 4LH

**Deleted:** 0845 146 1010

## 10. Review

This policy will be subject to review on a 5 yearly basis, or sooner should there be any relevant legislative changes, to ensure continued relevance and consistency in application.

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**Appendix 2.**



**ORKNEY**  
ISLANDS COUNCIL

**NOTIFICATION OF WHISTLEBLOWING CONCERN**

**Employee Details**

Name	
Job Title	
Contact Address	
Contact Phone Number	
Contact email	

**Detail of Concern** (please fully outline the matter/s with which you are concerned. The background and history of the concern, giving names, dates and places where possible, should be set out, and the reason why you are particularly concerned about the situation.)

Please continue on a separate sheet if required.

## **Employee Declaration**

I confirm that the information provided as part of this concern is on the basis that I have an honest and reliable suspicion or belief that malpractice or wrongdoing has happened, is happening, or is likely to happen.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**This form should be submitted to the Chief Internal Auditor.**

**Should your concern be about, or involve, the Chief Executive, then the Chief Internal Auditor, the Corporate Director of Strategy, Performance and Business Solutions or the Council's Monitoring Officer are all appropriate persons to submit this to.**

**Where the concern is about the Internal Audit section you should submit this form to the Council's Monitoring Officer.**



## Equality Impact Assessment

The purpose of an Equality Impact Assessment (EqIA) is to improve the work of Orkney Islands Council by making sure it promotes equality and does not discriminate. This assessment records the likely impact of any changes to a function, policy or plan by anticipating the consequences, and making sure that any negative impacts are eliminated or minimised and positive impacts are maximised.

<b>1. Identification of Function, Policy or Plan</b>	
Name of function / policy / plan to be assessed.	Whistle Blowing Policy and Procedure
Service / service area responsible.	Strategy, Performance and Business Solutions
Name of person carrying out the assessment and contact details.	Craig Walker
Date of assessment.	24 October 2024
Is the function / policy / plan new or existing? (Please indicate also if the service is to be deleted, reduced or changed significantly).	Review of existing policy and procedure.

<b>2. Initial Screening</b>	
What are the intended outcomes of the function / policy / plan?	To ensure that employees or workers who undertake work on behalf of the Council know their right to raise concerns under legislation in the Public Interest Disclosure (Prescribed Persons) Order 2014.
Is the function / policy / plan strategically important?	(Strategic plans include major investment plans, new strategic frameworks or plans such as annual budgets, locality plans or corporate plans).
State who is, or may be affected by this function / policy / plan, and how.	Applies to all Council employees and workers.



How have stakeholders been involved in the development of this function / policy / plan?	Yes
Is there any existing data and / or research relating to equalities issues in this policy area? Please summarise. E.g. consultations, national surveys, performance data, complaints, service user feedback, academic / consultants' reports, benchmarking (see equalities resources on OIC information portal).	
Is there any existing evidence relating to socio-economic disadvantage and inequalities of outcome in this policy area? Please summarise. E.g. For people living in poverty or for people of low income. See <a href="#">The Fairer Scotland Duty Guidance for Public Bodies</a> for further information.	(Please complete this section for proposals relating to strategic decisions).
Could the function / policy have a differential impact on any of the following equality areas?	(Please provide any evidence – positive impacts / benefits, negative impacts and reasons).
1. Race: this includes ethnic or national groups, colour and nationality.	No
2. Sex: a man or a woman.	No
3. Sexual Orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	No
4. Gender Reassignment: the process of transitioning from one gender to another.	No
5. Pregnancy and maternity.	No
6. Age: people of different ages.	No
7. Religion or beliefs or none (atheists).	No

8. Caring responsibilities.	No
9. Care experienced.	No
10. Marriage and Civil Partnerships.	No
11. Disability: people with disabilities (whether registered or not).	(Includes physical impairment, sensory impairment, cognitive impairment, mental health) No
12. Socio-economic disadvantage.	No

### 3. Impact Assessment

Does the analysis above identify any differential impacts which need to be addressed?	No
How could you minimise or remove any potential negative impacts?	N/A
Do you have enough information to make a judgement? If no, what information do you require?	Yes

### 4. Conclusions and Planned Action

Is further work required?	No.
What action is to be taken?	N/A
Who will undertake it?	N/A
When will it be done?	N/A
How will it be monitored? (e.g. through service plans).	N/A

Signature:



Date: 23 October 2024

Name: CRAIG A WALKER

(BLOCK CAPITALS).

Please sign and date this form, keep one copy and send a copy to HR and Performance. A Word version should also be emailed to HR and Performance at [hrsupport@orkney.gov.uk](mailto:hrsupport@orkney.gov.uk)

## Island Communities Impact Assessment


### Whistleblowing Policy and Procedure


Preliminary Considerations	Response
Please provide a brief description or summary of the policy, strategy or service under review for the purposes of this assessment.	To ensure that employees or workers who undertake work on behalf of the Council know their right to raise concerns under legislation in the Public Interest Disclosure (Prescribed Persons) Order 2014.
Step 1 – Develop a clear understanding of your objectives	Response
What are the objectives of the policy, strategy or service?	
Do you need to consult?	
How are islands identified for the purpose of the policy, strategy or service?	
What are the intended impacts/outcomes and how do these potentially differ in the islands?	
Is the policy, strategy or service new?	Review of existing policy and procedure.
Step 2 – Gather your data and identify your stakeholders	Response
What data is available about the current situation in the islands?	None
Do you need to consult?	No
How does any existing data differ between islands?	No
Are there any existing design features or mitigations in place?	No
Step 3 – Consultation	Response
Who do you need to consult with?	No one
How will you carry out your consultation and in what timescales?	N/A

What questions will you ask when considering how to address island realities?	N/A
What information has already been gathered through consultations and what concerns have been raised previously by island communities?	N/A
Is your consultation robust and meaningful and sufficient to comply with the Section 7 duty?	N/A
Step 4 – Assessment	Response
Does your assessment identify any unique impacts on island communities?	No
Does your assessment identify any potential barriers or wider impacts?	No
How will you address these?	N/A
<p><b>You must now determine whether in your opinion your policy, strategy or service is likely to have an effect on an island community, which is significantly different from its effect on other communities (including other island communities).</b></p> <p>If your answer is <b>No</b> to the above question, a full ICIA will NOT be required and <b>you can process to Step 6.</b></p> <p>If the answer is <b>Yes</b>, an ICIA must be prepared and <b>you should proceed to Step 5.</b></p> <p>To form your opinion, the following questions should be considered:</p> <ul style="list-style-type: none"> <li>• Does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes (such as different levels of satisfaction, or different rates of participation)?</li> <li>• Are these different effects likely?</li> <li>• Are these effects significantly different?</li> <li>• Could the effect amount to a disadvantage for an island community compared to the Scottish mainland or between island groups?</li> </ul>	

Step 5 – Preparing your ICIA	Response
In Step 5, you should describe the likely significantly different effect of the policy, strategy or service:	N/A
Assess the extent to which you consider that the policy, strategy or service can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it.	N/A
Consider alternative delivery mechanisms and whether further consultation is required.	N/A
Describe how these alternative delivery mechanisms will improve or mitigate outcomes for island communities.	N/A
Identify resources required to improve or mitigate outcomes for island communities.	N/A
Stage 6 – Making adjustments to your work	Response
Should delivery mechanisms/mitigations vary in different communities?	No, this is an internal Council wide Policy and Procedure that applies quality to all employees and workers.
Do you need to consult with island communities in respect of mechanisms or mitigations?	No specific or separate requirement, covered sufficiently under normal consultation and engagement.
Have island circumstances been factored into the evaluation process?	Yes,
Have any island-specific indicators/targets been identified that require monitoring?	No
How will outcomes be measured on the islands?	Outcomes measured in relation to the number of dis closures under the policy and the nature of the disclosure.
How has the policy, strategy or service affected island communities?	No evidence of the policy and procedure having been used by employees or workers since it was implemented.

How will lessons learned in this ICIA inform future policy making and service delivery?	N/A
Step 7 – Publishing your ICIA	Response
Have you presented your ICIA in an Easy Read format?	Yes
Does it need to be presented in Gaelic or any other language?	No
Where will you publish your ICIA and will relevant stakeholders be able to easily access it?	Yes
Who will signoff your final ICIA and why?	Karen Greaves, Corporate Director for Strategy, Performance and Business Solutions

ICIA completed by:	Craig Walker
Position:	Service Manger (HR Operations)
Signature:	
Date complete:	24 October 2024

ICIA approved by:	Karen Greaves
Position:	Corporate Director for Strategy, Performance and Business Solutions
Signature:	
Date complete:	24 October 2024