

Raising a Concern under the Civil Service Code and Whistleblowing Policy

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Part One: Scope and Application

This section details the purpose of this policy, the legal requirements, who this policy applies to and the key requirements.

Purpose

We are committed to ensuring high standards of conduct in all that we do. These standards are reinforced by the Civil Service Code¹ and the standards expected in terms of your conduct².

However, wrongdoing can occur. It is important that you know what to do if, in the course of your work, you come across something that you think is wrong, illegal or endangers others within the Scottish Government (SG) or the public.

These pages will guide you through the process of raising a concern within the SG, including a concern which you believe goes against the core values in the Civil Service code, i.e. integrity, honesty, objectivity and impartiality and/or a concern relating to a breach of the conduct policies, criminal or unlawful activity by others or any security risks or breaches.

Some of these concerns may be regarded as a “qualifying disclosure³” (sometimes known as “whistleblowing”) under the Public Interest Disclosure Act 1998 (“PIDA”).

The Permanent Secretary and the Executive Team are committed to ensuring that whatever action is found to be necessary is taken. They will be updated on progress of cases and any action taken.

Legal Requirements

Qualifying Disclosures (“whistleblowing”)

A qualifying disclosure has a specific, legal meaning. Making a qualifying disclosure is often called “whistleblowing”. When an individual raises a concern about past, present or imminent issues, or an attempt to cover up those issues it may be regarded as a qualifying disclosure in specific circumstances. The individual must reasonably believe that the disclosure of information is in the public interest and that the information tends to show one or more of the following has been, is being or is likely to occur:

- A criminal offence, e.g. fraud.
- Someone’s health and safety is in danger.
- Risk or actual damage to the environment.
- A miscarriage of justice.
- Your employer is not complying with the law.

¹ <https://beta.gov.scot/publications/civil-service-code/>

² <http://saltire/my-workplace/Pages/My-Workplace.aspx#Conduct and discipline/Fairness at work->

³ <http://www.legislation.gov.uk/ukpga/1998/23/section/1>

The above list is not exhaustive and what amounts to a qualifying disclosure is fully set out in the Public Interest Disclosure Act 1998 (PIDA).⁴ PIDA protects an individual, (often called a whistle blower) who has made a qualifying disclosure, from detriment arising in consequence of the disclosure.

This policy provides a process by which the above concerns can be raised within the Scottish Government. You are encouraged to raise issues in the first instance in this way because:

- This is the easiest way for you to obtain legal protection.
- It also makes it more likely that a subsequent disclosure to an outside body will be covered by the Act.

Who does this apply to?

- **All Civil Servants** employed in the Core Scottish Government, AIB, Disclosure Scotland, Education Scotland, SAAS and Transport Scotland⁵, (“SG”)
- **Individuals seconded into the SG** – you will be treated as being subject to the Civil Service Code and Civil Service Management Code for the purposes of this policy. You can therefore use this policy for any concerns you wish to raise under the Civil Service Code and you will have access to the Civil Service Commission (see Annex C for an explanation of the role of the Commission).
- **Individuals seconded out of the SG** – unless your secondment arrangement provides otherwise, you retain your status as a civil servant for the duration of the secondment. This means you will continue to be bound by your Civil Service terms and conditions, the Civil Service Code and the Civil Service Management Code. You should therefore use this policy. You will have access to the Civil Service Commission.
- **Individuals on loan from the SG to another Government Department** - you continue to be bound by the provisions applicable to all civil servants, including the Civil Service Code and the Civil Service Management Code. You should therefore, depending on the terms of your loan, either use this policy or the policy and procedure of the department you are loaned to. You will have access to the Civil Service Commission.
- **Individuals providing a service to the SG e.g. contractors.** You should follow the process set out in the policy to raise a concern if it falls under the categories of concern listed in this policy. We expect you to follow the provisions of the Civil Service Management Code and the Civil Service code while undertaking work for the SG. However, as a non-civil servant, you will not be able to raise a concern with the Civil Service Commission directly and the SG does not guarantee the protections afforded under PIDA in respect of whistleblowing claims. It may be more appropriate for you to raise your concern under the SG’s complaint handling process if you are dissatisfied with the service provided by the SG or a member of staff.

⁴ <http://www.legislation.gov.uk/ukpga/1998/23/section/1>

⁵ Civil Servants employed by Non-Ministerial Departments (including Revenue Scotland, FSS , SHR, OSCR CJS, NRS, SPPA and the Scottish Fiscal Commission) who are part of SG Main have separate policies.

Key Requirements

- Under the Civil Service Code everyone has a right and a responsibility to speak up and report behaviour that they reasonably believe contravenes the Code's values.
- You and your line manager should be engaged in regular, open discussion about your work and working environment where you may wish to discuss any concerns informally.
- If you experience something in the workplace which you consider to be in conflict with the Code and/or you perceive it to be wrongdoing, it is important that the concern is raised as soon as possible.
- Proof of your concern is not required (the SG will investigate as required), but you must have a reasonable belief that it relates to one of the [categories of concern](#) (set out below) which can be dealt with under this policy and is not of a wholly personal nature.
- If you have raised a concern with your manager or a Nominated Officer they will arrange a meeting with you to determine how to take the concern forward e.g. an internal inquiry, formal investigation etc.
- You will receive confirmation when the matter is concluded and, if appropriate, the outcome of any investigations and any steps that will be taken as a result.
- If you have raised a concern and you do not believe it has been appropriately investigated you may raise your concern with the next level of management. For concerns relating to the Civil Service Code you may raise your concern with the Civil Service Commission.
- Individuals are encouraged to raise any concerns they may have about perceived wrongdoing as soon as they notice it.
- Individuals raising a concern covered by the policy will be afforded protection.
- Concerns will be handled responsibly and professionally. Help and support will be available to individuals where concerns are raised under this policy.

Part Two: Procedures

Guiding Principles

Process

This section details the types of concern you can and cannot raise under this policy, the process for raising a concern, including what information is needed and how your concern will be handled. Annex D contains flowcharts which summarise the process.

What types of concerns can I raise?

There are a number of situations which might cause concern and could be raised under this policy. The below is not an exhaustive list, but provides information about some situations which might require investigation.

All that is required for your concern to be actioned is a reasonable, honest belief that wrongdoing, including breaches of the core values in the Code, has occurred, is occurring or is likely to occur.

Depending on the nature of your concern, it may either breach the Civil Service Code and/or be regarded as a qualifying disclosure (“whistleblowing”) in terms of PIDA.

Categories of Concern which can be raised under this policy

Civil Service Code concerns:

- misuse of official position, for example by using information acquired in the course of one’s official duties to further one’s private interests or those of others;
- deceiving or knowingly misleading Ministers, Parliament, or others;
- being influenced by improper pressure from others or the prospect of personal gain;
- ignoring inconvenient facts or relevant considerations when providing advice or making decisions;
- frustrating the implementation of policies once decisions are taken, by declining to take, or abstaining from, actions which flow from those decisions;
- acting in a way that unjustifiably favours or discriminates against particular individuals or interests;
- acting in a way that is determined by party political considerations, or using official resources for party political purposes;
- allowing one’s personal political views to determine any advice you give or your actions.

General concerns:

If you are unsure whether your concern is relevant under this policy, it is still important that you raise it so that it can be considered and investigated if appropriate. Further advice is available from your manager or a Nominated Officer.

Concerns that you cannot raise under this policy

This policy should not be used to raise concerns of a HR or personal nature, for example, complaints relating to a decision by managers, terms and conditions of employment and complaints against ministers. Such concerns should be raised under the relevant alternative policy, for example, the SG's Fairness at Work Policy.

This policy also does not apply to complaints from a member of the public about the service the Scottish Government provides. Such complaints will be dealt with under the [SG's complaint handling process](#).

This policy does not apply to matters of individual conscience where there is no suggestion of wrongdoing by an individual or a directorate but an individual is, for example, required to act in a way which conflicts with a deeply held personal belief.

How to raise a concern

Informal

If something is on your mind, you may wish to discuss this informally with your line manager before raising it formally. Your line manager may wish to seek informal advice from a Nominated Officer.

Formal

It is important that any relevant concern is raised as soon as possible. Proof is not required (the SG will investigate as required), but you must have a reasonable belief that it relates to one of the categories of concern which can be dealt with under this policy.

The following steps should be adhered to:

- a) The concern should, in most instances, be raised with your management chain (Band C and above) who will know how to progress your concerns or where to go to if not. (For [fraud concerns](#) you can also contact the dedicated, confidential telephone line on 08000 151628).
- b) There may be certain rare occasions, however, when raising a concern with your manager would be inappropriate because, for example:
 - It may implicate the manager in some way
 - It is about a senior manager within the line management chain or somewhere else in the directorate
 - It is particularly serious and needs to be dealt with as a matter of urgency
 - you believe your line manager is not best placed to deal with the concern or you do not feel comfortable raising your concern with them.

If any of the above applies then you should determine the level of seniority to raise the concern to. This could include escalating your concern to your DD, Director or DG.

Escalation examples:

- If you believe the concern may [implicate your manager](#) in some way, [or it relates to someone more senior than your manager](#), it should be raised with somebody more

senior in either the line management chain or another senior person in the Directorate. If you feel uncomfortable doing this, the concern should be raised directly with a Nominated Officer.

- If it is felt that the concern is particularly **serious and urgent** and you are worried that approaching your manager in the first instance may delay consideration or resolution of the matter, for example in the case of National Security, the concern should be raised immediately with a more senior manager or a Nominated Officer.
- If you believe the concern is **extremely serious and urgent** and it cannot be raised with the line manager, another line manager, a Nominated Officer, or a senior manager, then it can be raised with the Chief Executive/Director-General or equivalent. The concern should only be raised in this way if you have given serious consideration to all other internal options. You may be asked to explain why you did not raise the concern with your manager or a Nominated Officer.

Details of how to contact the Nominated Officers can be found at [Annex A](#).

While we encourage staff to raise concerns, you should not, in raising a concern act in bad faith or raise a malicious, vexatious or knowingly untrue concern in order to harm colleagues or your directorate. This will not be actioned under this policy. If after due consideration we believe that you have acted in this way, you may face disciplinary action, which depending on the seriousness could result in dismissal.

Throughout any investigation, you will still be expected to continue your duties/role as normal. In exceptional circumstances where this is not possible the case should be referred to your HR Adviser via the HR Helpdesk to provide advice on what actions could be taken.

If you are the subject of a concern and the concern is founded you may be subject to disciplinary action.

If you do not believe that your concern has been appropriately investigated and concluded, you may raise your concerns about the process with the next level of management or a Nominated officer and they will advise you of what will happen next. If your complaint relates to a concern under the Civil Service Code and you are a civil servant you may also raise your concern with the independent Civil Service Commission.

Confidentiality and anonymity

The best way to raise a concern is to do so openly, as this makes it easier to investigate and provide feedback.

Any concerns raised under this policy will be treated in a sensitive manner.

Any request for confidentiality will be respected as far as possible. However, if the situation arises where it is not possible to resolve the concern without revealing your identity (for example in matters of criminal law), we will aim to advise you before proceeding. The same considerations of confidentiality should be afforded to the individual(s) at the centre of the concern, as far as appropriate.

You may choose to raise concerns anonymously, i.e. without providing your name at all. If this is the case, the act of investigation itself may serve to reveal your identity. You are therefore encouraged, where possible, to put your name to concerns raised in the first instance to enable a full investigation to take place.

When anonymous concerns are raised they will be treated as credible and investigated so far as is possible.

Information needed to raise a concern

You should try to provide the following information:

- the background and reason behind the concern;
- whether you have already raised a concern with anyone and the response; and
- any relevant dates.

This information should demonstrate that there are reasonable grounds for the concern to be acted upon. It is important that matters are **not** investigated by yourself. Remember, all that is required for your concern to be actioned is a reasonable, honest belief that wrongdoing, including breaches of the core values in the Code, has occurred, is occurring or is likely to occur.

If applicable, any conflict of interest must be declared from the outset.

How the concern will be handled

All investigations will be conducted sensitively and as quickly as possible. While we cannot guarantee that the outcome will be as you may wish, we will handle the matter fairly and in accordance with policy.

Once a concern has been raised with your management chain (Band C and above) or a Nominated Officer, they may arrange a meeting with you to determine how the concern should be taken forward. This may involve an internal inquiry or a formal investigation. Depending on the nature of the concern, the manager or Nominated Officer will then establish who will investigate and deal with the concern, for example, for an alleged security breach, the Office of Protective Security may investigate. If requested a written confirmation will be sent to you within five working days, however, this may not be possible depending on the nature of the concern.

If a meeting is arranged, you may wish to be accompanied by a trade union representative or a colleague who is not involved in the area of work to which the concern relates. The meeting may be conducted over the telephone rather than face to face.

The manager or Nominated Officer will aim to update you on the progress of the concern within 28 days, where possible. However, depending on the nature of the investigation / concern it may not be possible or appropriate to provide full details.

For more complex or high risk concerns the Nominated Officer will raise the concern with the Integrity Group (see Annex B for more details) to determine the most appropriate action.

The manager or Nominated Officer will confirm when the matter is concluded and, if appropriate, the outcome of the investigation, maintaining security and confidentiality for all parties as far as possible.

It is for the SG to be satisfied that the concern has been investigated and concluded appropriately. However, if you do not believe that your concern has been appropriately

investigated and concluded, you may raise your concerns about the process with the next level of management and they will advise you of what will happen next. If your complaint relates to a concern under the Civil Service Code and you are a civil servant you may also raise your concern with the independent Civil Service Commission.

Throughout any investigation, you will still be expected to continue your duties/role as normal. In exceptional circumstances where this is not possible the case should be referred to your HR Adviser to provide advice on what actions could be taken. If you are the subject of a concern and the concern is founded you may be subject to disciplinary action.

Protection

We are committed to seriously consider any concerns you raise with us and to ensure they are investigated appropriately and that consideration of your concerns will be fair.

If your concern could be considered a 'qualifying disclosure' and you believe that you have been subject to detriment in consequence of making that disclosure or raising your concern, you should notify either the Nominated Officer or your HR Adviser via the HR Helpdesk.

If you believe that you have been subject to unacceptable treatment because you raised a concern under this policy, you should inform your line manager or someone else in your line management chain, or seek advice from the Nominated Officer in order that this can be investigated.

Investigation of any alleged detriment or unacceptable treatment may lead to disciplinary action.

Raising a concern externally

It is important that concerns are raised internally, as soon as possible. This will allow us the opportunity to address and resolve any concerns quickly. We are confident that there are sufficient internal avenues available to deal with any concerns raised.

We would caution staff against raising concerns externally before internal routes have been exhausted. While PIDA affords protection to staff who make qualifying disclosures in certain limited circumstances, disclosure of concerns externally may not be a qualifying disclosure and may breach the Official Secrets Act. You should always seek advice before raising a concern externally and we would expect that staff utilised internal advice and support wherever possible.

The protection from detriment afforded by PIDA requires that you have a reasonable belief that making a qualifying disclosure of information is in the public interest before raising a concern externally. In order to satisfy the 'public interest' test, disclosures must not be of a purely personal or private nature. Qualifying disclosures to certain regulatory bodies will not be dealt with under this policy e.g. The Health and Safety Executive, known as 'prescribed persons'⁶, can be made under PIDA in certain circumstances. In order to be

⁶https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

protected from detriment under this policy, however, you will need to follow the procedure set out in the PIDA.⁷ If you wish to raise a concern in this way, it would be advisable to seek your own legal advice.

⁷ <http://www.legislation.gov.uk/ukpga/1998/23/introduction>

Part Three: Support

We recognise that you may feel nervous when raising or considering whether to raise a concern. There are various channels of support available to you throughout the process:

- your manager and the Nominated Officer can advise you on available support. This may include for example a move to a different work area if necessary.
- you can use the Employee Assistance Programme (EAP). However, please note that the EAP is not a body with whom you can raise your concern under this policy. It can only provide emotional support and advice and you should not divulge details of the concern.
- trade union members may wish to seek advice and support from their representatives on the process of raising a concern and be accompanied to meetings during the investigation. You should note however that, depending on the nature of the concern and the subject matter, information arising from the investigation may not be able to be shared in detail with you or with your trade union representative. Any concerns you wish to raise under this policy should be discussed initially in general terms without going into specifics with your full time union representative. Further details can be given if it is agreed that there is no conflict or breach of confidentiality, if this is the case another full time union representative will be allocated to support you by your own trade union.

Roles and Responsibilities

Individuals are responsible for:

- Reporting any wrongdoing in accordance with Civil Service Code and this policy and related guidance and procedures;
- Complying with any request to assist with an investigation or attend any other meeting to resolve a Whistleblowing or Code case; and
- Maintaining confidentiality by not discussing any case with anyone other than those authorised to deal with that case.

Managers are responsible for;

- Ensuring their teams are aware of the whistleblowing policy and guidance including how to raise a concern;
- Upholding and promoting the Civil Service Code to colleagues;
- Reporting any concerns raised with them by colleagues to the Nominated Officer/s;
- Supporting colleagues who raise a concern and those who may be the subject of or involved in a Whistleblowing / Civil Service Code case until the process is concluded; and
- Ensuring they comply with this policy, guidance and procedures, including the requirement that they must not ask their colleagues to carry out any form of surveillance or monitoring of the actions of others.

Nominated Officers are responsible for:

- Acting as a contact point for colleagues who wish to raise a concern under this policy, guidance and procedures;
- Signposting colleagues to the most appropriate person and sources of personal support and further advice/guidance to deal with their concern if it is clearly not a Whistleblowing or Code issue but rather, for example, of an HR/Personal Nature;
- Raising more complex or high level risk concerns with the Integrity Group to determine the most appropriate action;
- Coordinating any investigation/s which may include more than one investigating department e.g. IT Security & HR;
- Updating if appropriate the Integrity Group on progress;
- Convening the Integrity Group as required to agree an appropriate course of action after receiving the investigation report and to communicate this to the member of management identified as needing to be consulted or made aware;

- As far as they appropriately and lawfully can, providing regular progress updates and communicating the outcome of cases to colleagues who have raised a concern;
- Ensuring the Secretary of the Integrity Group is sent all case information and this is kept in accordance with the relevant legislation and the Scottish Government's policies and procedures on the management of, security of and access to, information; and
- Recommending any changes to the policy and the guidance and procedures in the light of their experiences in delivering their role.

Nominated Officers are:

- Jennifer Inglis-Jones, Deputy Director Internal Audit
- Stuart Dickson, Internal Audit
- Gary Richardson, Internal Audit

You can contact a Nominated Officer either by phone or email the dedicated Nominated Officer/s mailbox at SGNominatedOfficers@gov.scot

The Integrity Group (in relation to complex or high level risk concerns) is responsible for:

- Deciding whether an investigation should take place and if so, what form it should take and appointing an Investigating Officer to undertake it;
- Receiving the investigation report and deciding on an appropriate course of action to consider the case;
- Meeting at least six monthly to consider all new Whistleblowing or Code concerns, review any on-going cases and discuss general matters relating to the policy.

When a new concern is reported by the Nominated Officer a response from the members of the group will be sought within 10 working days.

See further details about the [Integrity Group at Annex B](#)

Investigating Officer is responsible for:

- Carrying out an impartial and independent investigation;
- Reporting findings to the Nominated Officer and if appropriate the Integrity Group in an unbiased, factual and fair manner.

Scottish Government - Integrity Group

The primary purpose of the Integrity Group is to improve the Scottish Government's prevention of and response to fraud, bribery, corruption and wrongdoing.

The Integrity Group is responsible for monitoring relevant cases of suspected external and internal wrongdoing that are reported to the **Governance & Risk Team** through formal reporting lines. This includes supporting and reporting on the concerns raised under the 'Raising a concern under the Civil Service Code and Whistleblowing policy and guidance'. It is also available to advise on the handling of specific allegations of external and internal wrongdoing where required.

The permanent members of the Integrity Group are:

- The SG Counter Fraud Champion (Chair)
- Head of Governance and Risk
- The Head of Finance Programme Management
- A nominated HR representative
- The Chief Information Security Officer
- A nominated Scottish Government Legal Directorate (SGLD) advisor
- A nominated Internal Audit representative.

The Integrity Group may co-opt additional members with particular knowledge or expertise to assist in consideration of a specific case or require individual members of staff to attend its meetings, including Nominated Officers when appropriate.

Individual Integrity Group Members

Integrity Group members will be responsible for ensuring the necessary action in their functional areas. The immediate actions of the functional areas, insofar as they are appropriate to the particular case, will include:

- **Counter Fraud Champion and Fraud Response Team:** Leads in promoting an anti-fraud culture including communications; coordinating the reporting of fraud and lessons learned across the SG, including fraud alerts; assist in assessing the risk of fraud in policies and programmes; work with counter fraud networks in the public, private and voluntary sectors; coordinate fraud investigation activity across the SG; lead, on behalf of the Integrity Group, counter fraud policy development.
- **Governance and Risk:** Supports the work of the Integrity Group including the coordinating, monitoring and reporting, as appropriate, of the preparation, investigation and handling of all allegations of wrongdoing. This includes managing the implementation of a comprehensive fraud action plan as directed by the Group and the formal reporting of progress through official channels.
- **Finance** (in conjunction with business areas): Safeguard funds possibly at risk; plug any immediately obvious gaps in financial controls; consider the case for recovery action and initiate action to recover funds as required; determine the financial effects of frauds; arrange, where necessary, for notation of the relevant accounts.

- **HR** (in consultation with the other Integrity Group members): If it is appropriate, arrange to suspend SG members of staff pending the outcome of investigations (and review the notice of suspension at regular intervals throughout the investigation); appoint an Investigating Officer; liaise with SGLD on legal implications under employment legislation; consider, in consultation with line management, the sensitivity of the allegations in terms of public interest and whether the Communications Directorate and/or Ministers should be briefed; implement disciplinary procedures against perpetrators of frauds and other members of staff whose actions may have facilitated frauds; consider the action to be taken if lesser instances of misconduct have been identified during the investigation.
- **Information Security**: Protect accounting and other records; safeguard relevant records and assets possibly at risk; restrict access to offices and records of individuals involved by altering or withdrawing cards/passwords; pursue cases of straightforward theft; lead on information assurance work and counter fraud activity on information and communication technology.
- **SGLD**: Provide advice as appropriate.
- **Internal Audit**: If appropriate, carry out investigations and liaise with the appropriate Police/Procurator Fiscal Service contacts; make recommendations for improvement where appropriate and advise on potential lessons to be learned.

While these responsibilities are listed separately, they are clearly inter-linked and close liaison on developments in specific areas is essential, as is the involvement of line management at an appropriate level. It will invariably be necessary to act with extreme urgency at this stage.

Civil Service Commission

The Civil Service Commission operate across the UK and have been helping to uphold the standards of the Civil Service since their original appointment in 1854. The current Commission was established as an executive Non Departmental Public Body (NDPB) under the Constitutional Reform and Governance Act 2010 (the CRAG Act). The Commissioners are appointed by the Crown following open competition. The Commission and its Commissioners are therefore independent of the Civil Service.

The Commission has powers under the CRAG Act to hear and decide on complaints raised by civil servants [under the Civil Service Code specifically](#). It does not hear complaints on issues outside of the Civil Service Code, for example personnel grievances.

Can I take my concern straight to the Civil Service Commission?

You may raise a concern direct with the Commission, however where appropriate, the Commission will expect that you have raised the concern within the SG first in accordance with this policy. If you raise a concern directly with the Commission, without it first being raised within the SG, the Commission will ask why it is not appropriate to raise the matter internally first. The Commission will inform you directly about whether they are prepared to investigate the concern.

How can I contact the Civil Service Commission?

Further information on how to raise a concern with the Commission is available from:

<http://civilservicecommission.independent.gov.uk/>

Civil Service Commission

G/8

1 Horse Guards Road

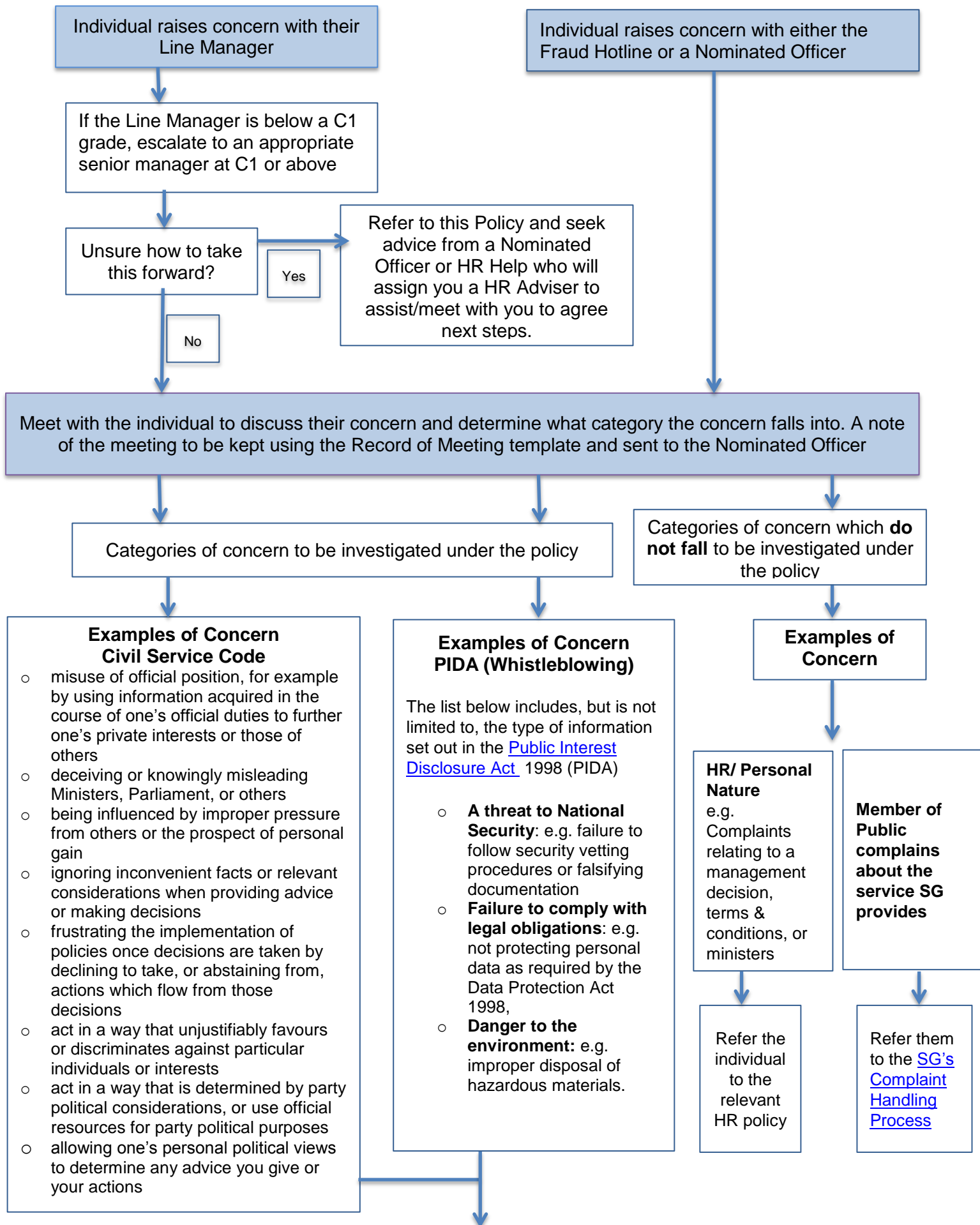
London

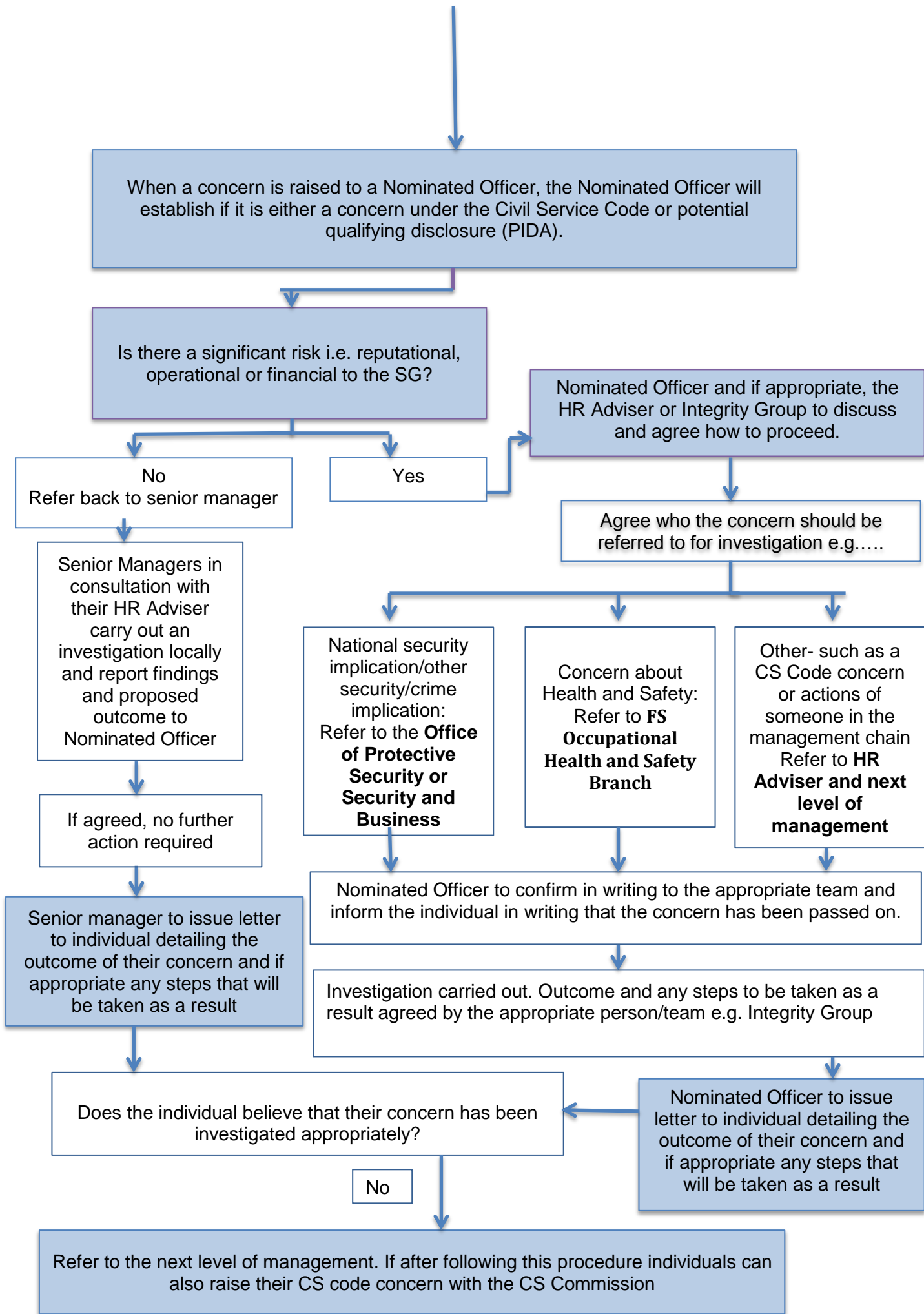
SW1A 2HQ

E-mail: info@civilservicecommission.org.uk

Tel: 020 7271 0831

Process Summary Flowcharts





When a concern is raised to a Nominated Officer, the Nominated Officer will establish if it is either a concern under the Civil Service Code or potential qualifying disclosure (PIDA).

Is there a significant risk i.e. reputational, operational or financial to the SG?

Nominated Officer and if appropriate, the HR Adviser or Integrity Group to discuss and agree how to proceed.

No
Refer back to senior manager

Yes

Agree who the concern should be referred to for investigation e.g.....

Senior Managers in consultation with their HR Adviser carry out an investigation locally and report findings and proposed outcome to Nominated Officer

National security implication/other security/crime implication:
Refer to the **Office of Protective Security or Security and Business**

Concern about Health and Safety:
Refer to **FS Occupational Health and Safety Branch**

Other- such as a CS Code concern or actions of someone in the management chain
Refer to **HR Adviser and next level of management**

If agreed, no further action required

Nominated Officer to confirm in writing to the appropriate team and inform the individual in writing that the concern has been passed on.

Senior manager to issue letter to individual detailing the outcome of their concern and if appropriate any steps that will be taken as a result

Investigation carried out. Outcome and any steps to be taken as a result agreed by the appropriate person/team e.g. Integrity Group

Nominated Officer to issue letter to individual detailing the outcome of their concern and if appropriate any steps that will be taken as a result

Does the individual believe that their concern has been investigated appropriately?

No

Refer to the next level of management. If after following this procedure individuals can also raise their CS code concern with the CS Commission

Policy Audit

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Version Control Log	Change	Date of change	New Version Control
V1.0		19/12/17	V1.1