

CITY MARKETS GLASGOW
Whistleblowing and Response Policy

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1. Introduction

- 1.1 City Markets Glasgow is committed to ensuring that the opportunity for fraud and corruption is reduced as reasonably possible. Where fraud, corruption and other problems are suspected, reported or detected, they will be dealt with in a firm and controlled manner.
- 1.2 The purpose of the Whistleblowing and Response Policy is to advise and guide Board members, staff and the public about how fraud and corruption will be dealt with.
- 1.3 The policy set out in this document covers the following areas:
 - Preventing fraud and corruption.
 - City Markets Glasgow's rules and procedures.
 - City Markets Glasgow's whistleblowing and investigation arrangements.

2. Preventing fraud and corruption

The best way to tackle fraud and corruption is to prevent it from happening in the first place by:

- Having clear rules and procedures and keeping them up to date.
- Ensuring that suitable levels of internal checks are included in working procedures, particularly financial procedures. It is important that duties are organised so that no one person can carry out a complete transaction without some form of checking process being built into the system.
- Following the correct procedures when employing new staff including the taking up of references and disclosure checks.
- Working with other organisations to prevent and detect fraud and participating in the National Fraud Initiative.
- Maintaining and publicising whistleblowing facilities that allow and encourage staff and the public to raise concerns.

3. City Markets Glasgow rules and procedures

- 3.1 A number of rules and procedures have been approved and adopted to ensure that City Markets Glasgow's business is properly controlled. They form the basis of City Markets Glasgow's internal control process and it is important that Board members and staff are aware of, and abide by, them.
- 3.2 The most important of these are:
 - Code of Conduct for Employees
 - Financial Controls and Procedures
 - Standing Orders Relating to Contracts
 - Employees' Conditions of Service
- 3.3 Employees must follow the Code of Conduct at all times and also make sure that they read and understand the rules and procedures that apply to them and act in line with them.

3.4 Any breaches of these procedures and rules may result in disciplinary action which may include dismissal.

3.5 The Financial Controls and Procedures require all cases of actual or suspected fraud, corruption and theft to be reported immediately to Glasgow City Council's Head of Audit and Inspection. The U] ^{aa} } • A a æ ^{ must ensure that all staff are aware of the reporting requirement.

4. Whistleblowing and Investigation Arrangements

4.1 Aims and Scope of the Arrangements

a) In addition to governing how investigations are dealt with, the arrangements aim to:

- Provide avenues for staff and the public to raise concerns and receive feedback on any action taken.
- Reassure whistleblowers that every effort will be made to protect them from reprisals or victimisation for whistleblowing in good faith.

b) There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. Whistleblowing is intended to cover concerns that fall outside the scope of other procedures. Such concerns may be about something that:

- Is unlawful.
- Is against City Markets Glasgow's rules and procedures.
- Relates to standards or practices.
- Amounts to improper conduct.

4.2 Safeguards

Harassment or Victimisation.

City Markets Glasgow 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. City Markets Glasgow will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith. This does not mean that if a member of staff is already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

Confidentiality

City Markets Glasgow and/or Glasgow City Council will endeavour to protect the identity of individuals who raise concerns and do not want their names 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 may be required as part of the evidence necessary to show that an allegation is correct.

Anonymous Allegations

Concerns expressed anonymously are much less powerful than concerns to which a person puts their name, but anonymous allegations will be considered at the discretion of the Managing Director and/or the Head of Audit and Inspection. In exercising this discretion, account will be taken of:

- The seriousness of the issue raised.
- The credibility of the concern.

- The likelihood of confirming the allegation from attributable sources.

Untrue Allegations

If staff make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, individuals make malicious or vexatious allegations, the allegations will not be taken further and disciplinary action may result. The judgement of whether an allegation is malicious or vexatious rests with the Head of Audit and Inspection.

4.3 Raising a Concern

Concerns can be reported to City Markets Glasgow or to Glasgow City Council.

Concerns reported to City Markets Glasgow will be reviewed by the U] ^!æā } • Å æ æ ^!.

Concerns reported to Glasgow City Council will be reviewed by Glasgow City Council's Head of Audit and Inspection.

Concerns can be reported to City Markets Glasgow by calling 0141 287 2500 and asking to speak with the Operations Manager. Calls will be answered between 08.30 and 17.00 Monday to Thursday and 08.30 and 16.00 on Friday. Letters can also be addressed to:

Operations Manager
City Markets Glasgow
130 Blochairn Road
Glasgow
G21 2DU

Letters should be marked "Private and Confidential"

Concerns can be reported to Glasgow City Council by calling 0141 287 3777. Calls will be answered between 08.30 and 17.00 Monday to Friday and outwith these times a message can be left. Alternatively, reports can be submitted using Glasgow City Council's web reporting facility. Letters can also be addressed to:

The Head of Audit and Inspection
Financial Services
City Chambers
Glasgow
G2 1DU

The earlier the concern is expressed, the easier it is to take action.

Although individuals 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.

Staff may invite their Trade Union or professional association to raise a matter on their behalf.

4.4 How the Complaint will be dealt with

- a) The Operations Manager of City Markets Glasgow, or Glasgow City Council's Head of Audit and Inspection, logs all reports and carries out a preliminary review in each case to determine the most appropriate course of action. The action will depend on the nature of the concern and will also be logged. Any matters which fall within the scope of other existing procedures (eg. child protection, complaints or discrimination issues) will be dealt with under these procedures. Some concerns may be resolved

by agreed action without the need for investigation. Matters to be investigated may be:

- Dealt with internally by City Markets Glasgow or Glasgow City Council Internal Audit, or other specialist sections such as the Benefits Counter Fraud Unit.
 - Referred to the Police or other external agency.
- b) City Markets Glasgow and/or Glasgow City Council will endeavour to keep named complainants informed of the progress of the investigation and will initially write to the complainant:
- Acknowledging that the concern has been received.
 - Indicating how it proposes to deal with the matter.
 - Telling them whether any initial enquiries have been made, or
 - Telling them whether further investigation will take place, and if not, why not.

City Markets Glasgow and/or Glasgow City Council may ask for further information where this would assist in the investigation.

- c) investigations may result in recommendations for changes to procedures and systems which will be incorporated into action plans. Follow up reviews are carried out to ensure that recommendations are implemented.
- d) Investigations may lead to disciplinary action against employees conducted in accordance with City Markets Glasgow's Disciplinary Procedures.
- e) Where appropriate the Managing Director of City Markets Glasgow and/or Glasgow City Council's Head of Audit and Inspection will refer findings to the Police for investigation or review, after discussion with the Chief Executive or Executive Director of Corporate Services.
- f) Depending on the outcome of any enquiries it may not be possible to advise complainants of the outcome, eg. if the matter is referred to the Police for further enquiries or to protect an individual's human rights.

4.5 City Markets Glasgow Contact Details

Jim Cunningham – Operations Manager

jim.cunningham@citymarketsglasgow.co.uk

0141 287 2502

4.6 Glasgow City Council Internal Audit Contact Details

Peter Marsh – Head of Audit and Inspection

peter.marsh@finance.glasgow.gov.uk

0141 287 4053

William Hart – Assistant Head of Audit and Inspection

william.hart@fs.glasgow.gov.uk

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