

Section 20

Code of Conduct for Employees

1. Introduction

- 1.1 1.1 County Durham and Darlington Fire and Rescue Authority (CDDFRA) aspires to be the best FRS with the highest standards of ethical behaviour and competence, to ensure that safe, fair and equitable procedures are applied to all organisational transactions, including relationships with the public, employees, stakeholders and the use of public resources. To provide clear and consistent guidance, CDDFRA will develop documents to fulfil all statutory, organisational and best practice requirements.
- 1.2 This policy sets out the expectations of the Service of all employees in terms of behaviour and performance. It will also ensure that employees do not find themselves, inadvertently or otherwise, in a situation where their conduct could create an impression of undue influence or corruption in the minds of the public.
- 1.3 CDDFRA values the commitment and contribution of its people. It recognises that it is important to have systems and procedures in place which can identify areas where support and guidance may be required, to ensure that the community we serve can be confident that the affairs of the Service are conducted in accordance with the highest standards of probity and accountability.
- 1.4 A key element of the Core Code of Ethics and the Services behavioural framework is to demonstrate the highest standards of conduct and ethical behaviour, throughout the organisation. You must therefore comply with:
- (a) The Core Code of Ethics
 - (b) All applicable legislation.
 - (c) All service policies, procedures and information notes.
 - (d) Financial regulations.
 - (e) Conditions of service.
 - (f) Any other standard, guideline or instruction relevant to the service or activity.

2. Scope

- 2.1 The code of conduct applies to all employees. It also applies to those employees of other Fire and Rescue Services or Local Authorities who are seconded to this Service for any period and agency workers.

Core Code of Ethics

- 3.1 Public trust and confidence in CDDFRA rely on us all demonstrating ethical behaviours. The Core Code sets out these ethical principles and help us continuously improve our organisational culture and workforce diversity and assists us in supporting our community in the best way.
- 3.2 All employees of CDDFRA as well as those working with, or on behalf of, the FRS are expected to follow the Code of Ethics and consistently demonstrate the ethical behaviours.
- 3.3 The principles of the Core Code are represented within CDDFRA policies and processes to ensure they are embedded and at the heart of our day-to-day activity.
- 3.4 The five ethical principles in the Code of Ethics are:
 - a) Putting our communities first – we put the interests of the public, the community, and the service users first.
 - b) Integrity – we act with integrity including being open, honest and consistent in everything we do.
 - c) Dignity and Respect – we treat people with dignity and respect, making decisions objectively based on evidence, without discrimination or bias.
 - d) Leadership – we are all positive role models, always demonstrating flexible and resilient leadership.
 - e) Equality, diversity and inclusion – we continually recognise and promote the value of EDI, both within the FRS and the wider communities in which we serve. We stand against all forms of discrimination, create equal opportunities, promote quality, foster good relations and celebrate difference.

4 CDDFRA Values and behaviours

- 4.1 CDDFRA vision is simple, we want to have the safest people and safest places. We have three core values. These are Professional, Innovative and Effective (PIE) and they describe the service our customers should expect from all employees in line with the Core Code of Ethics.
- 4.2 Our values are further supported by a behavioural framework. The range of these behaviours falls into four areas, known as the 4Cs:
 - How we approach challenges:
We will approach challenges with flexibility, enthusiasm and motivation, passion, determination and resilience.
 - How we conduct ourselves:
We will conduct ourselves in a manner that is honest, trustworthy, reliable, accountable, consistent and respectful.
 - How we collaborate with others
We will be approachable, supportive, encouraging and inclusive, and value development when collaborating.

- How we drive change across the organisation to make a difference
We will drive change by being creative, resourceful, courageous, original, clear and focused
- 4.3 The Service expects all employees to always demonstrate these behaviours as well as the ethical principles. How well our staff are demonstrating these behaviours as part of their day-to-day job is assessed within our appraisal system.

5. Standards

- 5.1 As employees, we must give the highest possible standard of service to the people of County Durham and Darlington, and where it is part of our duties, to provide appropriate advice to elected members and colleagues with total impartiality.
- 5.2 Any impropriety, breach of procedure or any serious deficiency in the provision of service must be reported to a line manager.
- 5.3 In all cases, it is not enough to avoid actual impropriety. All employees must, always, avoid any occasion for suspicion and any appearance of improper conduct.

6. Personal conduct and behaviour

- 6.1 As an employee and representative of the Service, the expectations are that your conduct is of the highest standard and act with honesty, integrity and professionalism. It is expected that each employee:
- (a) Carries out the full requirements of their role, as detailed in their contract of employment, job description and service policies and procedures.
 - (b) Attend work in accordance with the terms of their contract of employment and comply with the service's attendance management policy and procedure.
 - (c) Act in an appropriate manner in any situation where employees can be readily identified as a service employee, whether at work or otherwise.
 - (d) Maintain acceptable standards of appearance and personal hygiene, taking religious beliefs into account alongside the health and safety requirements of an individual's role.
 - (e) Wear, and maintain in a reasonable condition, any items of clothing and personal protective equipment provided by the Service and return any items which are not fit for purpose. Any wilful over ordering of stock items will not be tolerated.
- 6.2 Employees must not:

- (a) Engage in any conduct or behaviour that is potentially harmful to the reputation of the Service, its services or interests, or conduct which brings the service into disrepute, even when outside of work.
 - (b) Be under the influence of alcohol or un-prescribed drugs to adversely affect their performance.
 - (c) Misuse your official position or seek to use information obtained in the course of their work, for personal interests or the interests of others.
 - (d) Misuse any Service property, equipment or location for their own personal interests or the interests of others.
- 6.3 The above lists are not exhaustive, for further information please refer to the policies and procedures outlined in section 20.

7. Social media

- 7.1 The service recognises the growing use of social media platforms such as blogs, Facebook, Twitter and Instagram. These are useful tools for communicating and engaging with the public and are already used by the service for this purpose.
- 7.2 Employees must ensure that their use of social media, professionally and personally, does not bring CDDFRA or the Fire Authority into disrepute or breach service policies. A social media Policy and guidelines have been written to help CDDFRA employees understand what is acceptable when using various platforms. These are available on SharePoint and employees should follow them whenever practical.
- 7.3 Employees must also follow the service's internet and email acceptable usage policy; this contains detailed provisions relating to the use of the service's information systems and IT facilities for both professional and personal use. These guidelines and policies set the standards of behaviour expected from employees in relation to their use of social media, email, websites, network and the internet in the broadest interpretation.

8. Equality and fairness

- 8.1 All members of the local community and CDDFRA employees have a right to be treated fairly and equally. All employees are expected to promote the service's equality, diversity and inclusion policy, Core Code of Ethics, core values and behaviours, both within the Service and externally to demonstrate commitment to all anti-discriminatory practices in all the service's activities.

9. Disclosure of information

- 9.1 As a service employee, we may obtain information that has not been made public and is still confidential. Employees must never disclose information given in confidence by anyone, or information acquired which is believed to be of a confidential nature, without the consent of a person authorised to give it or unless required to by law.
- 9.2 Employees must treat information received which is classified as official sensitive on a need-to-know basis and should be sure they have the sender's authority before onward transmitting this information.
- 9.3 Employees must not prevent another person from gaining access to information to which that person is entitled by law. Employees must not disclose confidential information for personal use or for use by anyone else known to you, or to the disadvantage or the discredit of the service or anyone else.
- 9.4 Employees must always observe the provisions of the Data Protection Act 2018 and General Data Protection Regulations (GDPR).
- 9.5 Employees should not make statements directly to the press or other media if it is not a requirement of your role without first getting approval from a line manager. Principal Officers should speak to the chief fire officer before making statements to the press or other media on major policy issues.

10. Political neutrality / politically restricted posts

- 10.1 The Local Government and Housing Act 1989 and the Local Democracy, Economic Development Construction Act 2009, make provision for certain posts to be politically restricted. The purpose of the legislation is to ensure political neutrality and to prevent advice and decisions from being improperly influenced by separate loyalties.
- 10.2 Posts are restricted either because they are a specified post, or they meet certain criteria within the Act. If a post is politically restricted the requirements for restricting political activities will be specified in the terms and conditions of the position.
- 10.3 Even if an employee does not hold a politically restricted post, they should ensure that their right to engage in political or professional activities does not result in an actual or perceived conflict of interest with any official duties for the Service. Employees should ensure that they are able, and be seen to be able, to remain unbiased in the performance of those duties. Employees must not display political material within service premises.
- 10.4 Service employees serve the Authority as a whole and in carrying out their work must be politically neutral, ensuring that individual rights of all elected members are respected.

11. Relationships

11.1 Employees

The Service has built a culture where all employees are treated with dignity and respect and will ensure that employees work in a safe, secure and productive environment and are treated fairly in recruitment, employment, training and promotion. In addition, the Service expects all employees to be treated fairly, consistently and with respect by other employees and to be treated fairly and courteously by the community served.

11.2 Personal relationships

It is inevitable that some employees will form personal relationships, especially those working closely together or within the same team, however there may be occasions when this negatively impacts both their own work environment and that of their colleagues in many ways. This could include breaches of confidentiality, where confidential information is shared inappropriately between the parties, even if it is not related to their job responsibilities. Additionally, the relationship may result in behaviours that create discomfort or embarrassment for others, such as workplace arguments, exclusion or isolation of colleagues, or refusal to communicate due to disagreements or a breakup.

Individuals should advise their line manager of a personal relationship with someone within the Service. This procedure is relevant to all CDDFRA employees regardless of relationships that may exist or that may present.

In establishing whether there is a potential issue with the relationship that has been disclosed, managers may wish to consider the following:

- a) Are any employees likely to be made uncomfortable in their dealings with either employee because of the existence of a known personal relationship.
- b) Is a personal relationship seen to offer advantage to an employee and disadvantage to another by them feeling excluded due to the nature of the relationship?
- c) Is the relationship potentially interfering with the Service's professional provision of services.
- d) Is the relationship potentially having a negative effect on the professional relationships of a team.

If a personal relationship between employees working in the same area may create a conflict of interest, breach of confidentiality, health and safety risk, or unfair advantage, the manager, in consultation with HR, may consider alternative arrangements. These could include changes to reporting structures, team duties, or relocation. All such matters should be considered in confidence, in discussion with the employees in the personal relationship. Managers are recommended to speak with HR prior to any discussion taking place. In all instances, the individuals should be spoken to before any changes are made.

Consideration of any potential changes to terms and conditions because of changes need to be discussed.

Where there is line management, supervision or an employee is in a senior position within the Service, consideration should be made in relation to points above in addition to their involvement in recruitment, appraisal, promotion, discipline, financial payments of the other employee. Managers are recommended to speak to HR when this information is brought to their attention to consider any potential changes to reporting structures, team duties or relocation. Consideration should be made to any potential impact to terms and conditions if changes are implemented as a result.

If an employee feels that they have been discriminated because of informing the Service of a relationship, they should raise this with a member of the HR Team or their union representative.

11.2 Elected Members

Employees are accountable to the Fire Authority through its senior managers. For some, their role is to give advice to councillors and senior managers, and all are there to carry out the Fire Authority's work. Mutual respect between employees and councillors is essential to good local government.

Employees should not make personal appeals, written or oral, direct or indirect to Members of the Authority for matters concerning their employment with the Authority. Employees should utilise internal employment procedures and policies to resolve workplace disputes.

11.3 The local community

Employees must always remember their responsibilities to the community as a public servant and ensure courteous, efficient and impartial service delivery to all groups and individuals within the community in all aspects of the service provided.

11.4 Procurement and contracting or related decisions.

Employees must be fair and impartial in dealings with contractors, subcontractors and suppliers. If an employee is involved in any procurement, tendering or contracting processes, the service's procurement procedure (AD/2/14) must be followed. Employees should take no part in any direct or indirect involvement in purchasing, contracting or related decisions where there is a personal interest in the transaction. Should an employee have a personal interest at any time in any purchasing, contracting or related decisions, they must indicate their interest to the chief fire officer in writing. The chief fire officer may remove the employee from the process.

12. Secondary employment / outside commitments

- 12.1. All matters relating to secondary employment are fully set out in the secondary employment procedure (AD/2/39) and employees are reminded that they must refer to that procedure prior to undertaking any form of secondary employment whether it is paid, unpaid voluntary or self-employment. The service will consider applications from employees to undertake secondary employment if it does not conflict with the service's interests or their role, weaken public confidence in the service, affect the service reputation and fully complies with their terms and conditions of employment.

9.

13. The use of equipment, materials and vehicles

13.1. Equipment and materials

- a) Employees must not use the Service's telephone for private purposes unless under the arrangement for such facilities to be paid for. No other facilities or equipment provided may be used for personal gain.
- b) The Authority has provided an electronic mail system for use by authorised persons to assist in the business process. The system must be used in accordance with the internet and email acceptable usage policy (AD/2/12).
- c) The use of e-mail for representative bodies, social or charitable activities is subject to approval from a principal officer. There are no circumstances when the e-mail system can be used for other than legitimate business use. You are reminded that unauthorised or illegitimate use of the e-mail system may result in disciplinary procedures.

13.2 Vehicles

- (a) Service vehicles may only be used for authorised purposes. If there is any doubt whether a particular use is authorised, advice should be sought from the relevant manager. You are reminded that the insurance policy does not apply to unauthorised journeys and an employee driving the vehicle could be liable for any loss if an accident should occur, be guilty of driving a motor vehicle without insurance and taking the vehicle without the owner's consent. Employees are further reminded that when using a vehicle, they are not exempt from the road traffic laws legislation and therefore subject to potential prosecution.

14. Consultancy work, lecturing, speaking at conferences etc.

- 14.1 During the course of employment, employees may be asked to undertake consultancy and other opportunities, which allows development of expertise beyond the boundaries of their normal role. Where offers of consultancy work, lecturing, speaking at seminars, etc. are received the following will apply.
- (a) If an employee wishes or are invited to undertake consultancy, lecturing and other outside work including involvement in regional or national affairs, application for permission must be to the deputy chief fire officer. In the case of a deputy chief fire officer, permission must be sought from the chief fire officer (the clerk to the authority in the case of the chief fire officer). Any fees paid by virtue of this work will be treated as income for the Service.
 - (b) Where a request is received for a representative of the Service to make a presentation and the employee is not named, a principal officer will nominate a suitable person. This commission will then be undertaken, as part of that employee's employment and therefore any fee will be treated as income for the Service.
 - (c) When an approach is made directly to an employee because of that employee's reputation, skills, knowledge or experience then there is potential for any fee to be treated as income for the employee. In these circumstances you may apply to your principal officer for leave, paid or unpaid, as appropriate. In the case of paid leave, all fees will be treated as income for the Service. In the case of unpaid leave, the fee may be retained as applicable.
- 14.2 The above also applies in relation to an employee contributing to or writing a textbook, chapter for a reference book or an article for a journal. When work is undertaken in their own time then they would normally wholly retain any fees or commission.
- 14.3 Employees are reminded that work as detailed above, undertaken in their own time, is subject to the terms of the secondary employment policy.

15. Fraud and corruption

- 15.1 There is a large volume of legislation which regulates the service, and which sets out the framework to ensure that the service adopts effective control and monitoring in relation to the conduct of business.
- 15.2 In addition to compliance with legislation, the service has established an anti-fraud and corruption policy along with other policies and procedures that are designed to ensure a high standard of probity when conducting the affairs of the service. Employees must adhere to the financial regulations as well as policies, procedures and information notes.
- 15.3 Employees are also bound by the relevant terms and conditions of contract, which include references to standards of conduct and possible conflict of

interest between private interests and the interests of the service. Every employee has a role to play in maintaining the standards and ethical principles, which the public is entitled to expect of the Fire and Rescue Service.

- 15.4 The responsibility for maintaining effective monitoring systems, procedures and controls to prevent or detect fraud and corruption rests with managers responsible for service areas. However, employees are advised that the service must maintain the proper control of its financial affairs and will not hesitate to use auditors or the police to investigate suspected cases of fraud and corruption should the need arise.
- 15.5 Employees must be aware that it is a serious criminal offence to corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything or showing favour, or disfavour, to any person in your official capacity. If an allegation is made, it is for the employee to demonstrate that any such rewards have not been corruptly obtained. The relevant statutory provisions appear at appendix 'A'. However, if incidents of fraud and corruption nevertheless occur, the next objective is to ensure those management arrangements and systems of control are robust enough to identify when irregularities are occurring.
- 15.6 The alerting of incidents of potential fraud and corruption can arise in a variety of ways including.
 - (a) Information provided by employees (sometimes anonymously).
 - (b) Information provided by members of the public (sometimes anonymously).
 - (c) Information provided by other services or agencies.
 - (d) Information highlighted by management processes.
 - (e) Information highlighted by system controls.
 - (f) Information highlighted by an audit or review process.

16 Reporting allegations of irregularities

- 16.1 Indications of suspected irregularities can arise in many different ways and it is possible that anybody may be the first to become alerted to a potential situation involving malpractice, fraud or corruption.
- 16.2 In order to ensure that a report or allegation is dealt with quickly and confidentially, employees are reminded that:-
 - (a) allegations will be handled discretely – any leaking of information may jeopardise the investigation, and could lead to disciplinary action being taken;
 - (b) as much information as possible must be recorded or collected in respect of the allegation – you should not delay the reporting process in order to achieve this;

- (c) records, including computer records must be secured so that there is no possibility of evidence being lost, destroyed, amended or otherwise tampered with.
- 16.3 If and when there is prima facie evidence that a criminal offence has been committed, the situation will be referred to the Police.
- 16.4 In the event of allegations or evidence indicating that financial irregularities have occurred, the Fire and Rescue Service will deal with all such issues in line with the Anti-Fraud and Corruption Policy.

13. Register of gifts

13.1 Register of Financial and other Interests

- (a) You must declare to the Chief Fire Officer any financial or non-financial interests that you consider could bring about a conflict with the interests of the Fire and Rescue Service. Section 117 of the Local Government Act 1972 requires you to make a formal declaration about contracts with the Authority in which you have a pecuniary interest. You are advised that appropriate record of interests will be maintained by the Service.
- (b) The criterion for 'interests' is as follows:-
 - (i) any external employment or business carried on by you (Note the contents of the Secondary Employment Policy);
 - (ii) the name of the secondary employer, the name of any firm in which you are a Partner and the name of any company in which you are a Director;
 - (iii) the name of any person who has made a payment to you, other than a relevant Authority, in carrying out your duties;
 - (iv) the name of any corporate body which has a place of business or land in the Authority's area and in which you have a beneficial interest;
 - (v) a description of any contract for goods, services or works made between the Authority and you or a firm in which you are a Partner or Director;
 - (vi) the address (or other description sufficient to identify the location) of any land in which you have a beneficial interest and which is in the area of the Authority;

- (vii) the address (or other description sufficient to identify the location) of any land where the Landlord is the Authority and the tenant is the firm in which you are a partner or director;
 - (vii) the address (or other description sufficient to identify the location) of any land in the Authority's area in which you have a licence (alone or jointly with others) to occupy for 28 days or longer.
- 13.4 A Register of Interests Form (See Appendix 'B') has been provided on which you must record any interests as identified above.
- 13.5 You must ensure that you have completed the relevant documentation, for consideration. You must also ensure that the documentation is valid, accurate and updated regularly as necessary.
- 13.6 It is your responsibility to ensure that, should any details declared on the Record of Interests Form change, a new form is submitted.

Register of financial and other interest

17.1 Register of financial and other Interests

- (a) Employees must declare to the chief fire officer any financial or non-financial interests that they consider could bring about a conflict with the interests of the service. Section 117 of the Local Government Act 1972 requires they make a formal declaration about contracts with the Authority in which they have a pecuniary interest. Employees are advised that an appropriate record of interests will be maintained by the service.
- (b) The criterion for 'interests' is as follows.
 - (i) Any external employment or business carried out by an employee (note the contents of the secondary employment policy).
 - (ii) The name of the secondary employer, the name of any firm in which the employee are a partner and the name of any company in which an employee is a director.
 - (iii) The name of any person who has made a payment to an employee, other than a relevant service, in carrying out their duties.
 - (iv) The name of any corporate body which has a place of business or land in the service area and in which the employee has a beneficial interest.
 - (v) A description of any contract for goods, services or works made between the service and the employee or a firm in which the employee is a partner or director.
 - (vi) The address (or other description sufficient to identify the location) of any land in which an employee has a beneficial interest and which is in the area of the service.

- (vii) The address (or other description sufficient to identify the location) of any land where the landlord is the service, and the tenant is the firm in which the employee is a partner or director.
- (vii) The address (or other description sufficient to identify the location) of any land in the service's area in which the employee has a licence (alone or jointly with others) to occupy for 28 days or longer.
- (c) A register of interests form C1 has been provided on which the employee must record any interests as identified above. This will be recorded on a register held within the governance section. Forms are available from HR forms is SharePoint.
- (d) Employees must ensure that they have completed the relevant documentation for consideration, ensuring that the documentation is valid, accurate and updated regularly as necessary.
- (e) It is the responsibility of the employee to ensure that, should any details declared on the record of interests form change, a new form is submitted.

14. 18. Register of gifts

- 18.1 The official conduct of officers and other employees should never foster the suspicion of a conflict of interest. Employees must be careful not to show, by their behaviour, that they may be influenced by gifts whilst acting in an official capacity. This is important, not simply because the reputation of the service may be at stake, but also employees are liable to criminal proceedings if shown to be influenced by inducements.
- 18.2 A potential source of conflict between private and public interests is the offer of gifts, hospitality or benefits in kind to the employee in connection with their official duties. For the purposes of this code, a gift includes any item with a monetary value that has not been purchased and paid for by themselves or that has not been issued by the service during the normal course of their employment. This includes such things as hospitality, holidays, software, food and drink, clothes and electronic devices. Employees are reminded that this list is not exhaustive.
- 18.3 With the exception of unsolicited gratuities received in accordance with paragraph 18.4, employees must not, under cover of their employment, accept any fee or reward whatsoever other than their proper remuneration. When a gift must be refused, this should be done with tact and courtesy because the offering of gifts is more common practice in the commercial environment.
- 18.4 Employees may accept unsolicited gratuities offered by any person or organisation during the normal course of their employment provided that such gratuities are disposed of for charitable purposes to a charity to be determined by the chief fire officer. If a gift or unsolicited gratuity is simply delivered to the place of work, it must be reported to a SLT member, who in consultation with the chief fire officer will determine a suitable charity. Relevant forms are available in HR forms in SharePoint.

- 18.5 In all cases, the register of gifts / hospitality form must be completed and forwarded to the line manager. The line manager will check and then authorise the form and forward it to the governance section. A record of every gift / gratuity received by an employee will be recorded on a register of gifts, available within the governance section.
- 18.6 The only exceptions to the above are:
- (a) Gifts of a promotional nature on the conclusion of any courtesy visit to a factory or firm of a sort normally given by that firm.
 - (b) Gifts of a token value, often given at Christmas time such as diaries, calendars, pens, etc.

15.

19. Hospitality

- 19.1 A reasonable amount of hospitality may be offered as a normal part of public life, but it is important not to create an appearance of improper influence thus undermining public confidence.
- 19.2 Where hospitality is offered, special caution is needed when the host is seeking to do business with the service or to obtain a decision from it. It is important to avoid any suggestion of improper influence, and therefore consideration should be given to the following.
- (a) Is the donor or event significant in the community?
 - (b) Is the employee expected to attend because of their position in the community?
 - (c) Will the event be attended by others of a similar standing in the community?
 - (d) What is the motivation behind the invitation?
 - (e) Would the invitation be, in any way inappropriate or place the employee under pressure in relation to any current or future issue involving the service?
 - (f) Could the employee justify their decision to the service and the public?
 - (g) Is the extent of the hospitality reasonable and appropriate?
 - (h) How will the employee respond to the hospitality?
 - (i) Is the employee comfortable with the decision?
- 19.3 In general terms it will often be more acceptable to join in hospitality offered to a group than to accept something unique to the individual employee.
- 19.4 When a particular person or body has a matter currently in issue with the service, then offers of hospitality from that person or body should be refused even if, under normal circumstances, they would have been accepted.

- 19.5 Hospitality is sometimes offered to representatives of the service and is accepted as official, i.e. corporate level, because that is reasonable in the circumstances. In such cases, fire authority members and principal officers, or individuals nominated by them, should attend.
- 19.6 All offers of and acceptance of hospitality, other than those indicated at 16.5 above, must be reported and permission sought prior to acceptance where possible, using the register of gifts / hospitality form.
- 19.7 All records appertaining to either an employee's record of interests or record of gifts / hospitality will be available for inspection by officers who currently have access to personal data as defined under the Data Protection Act, and those other persons authorised to have access, such as auditors.

20. Malpractice occurring in the workplace (whistle-blowing)

- 20.1 The term whistleblowing is used to describe arrangements, which allow employees to express concerns about any types of malpractice, which may be occurring in the workplace. Such arrangements are closely linked to a culture which encourages employees to express their concerns (sometimes anonymously) without the fear of intimidation or recrimination, and in the confident knowledge that any reported concerns will be treated seriously and confidentially in line with the Raising Concerns Procedure (AD/2/43).

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