



Valleys to Coast

Raising Concerns

Introduction

We all have a shared commitment to keeping people safe and also to ensuring that Valleys to Coast is protected from risks which may threaten its existence or jeopardise the services we provide. We all have a role to play in meeting this commitment and some key positions have greater responsibilities.

Sorting out issues and concerns about safety and protecting the organisation from risks is part of the day to day work of all staff and is "business as usual". This procedure only comes into play in those rare circumstances when there is a breakdown in the quality of our service and concerns are not being dealt with properly or where due to the nature of the concern it should be escalated. When this occurs, this procedure document sets out what all staff and people in key roles are allowed and encouraged to do and indeed are expected to do to keep people and the organisation safe.

Who does this procedure apply to?

This procedure applies to all of the following:

- All employees, agency staff and consultants working within the business
- All contractors
- All Board members
- Scrutiny group members
- Our internal and external auditors
- Tenants, leaseholders, other residents and visitors.

Our approach

- We welcome and encourage all those listed in paragraph 2 to raise concerns using this procedure and we expect staff, the internal and external auditors and the Board to do so when they have a concern.

- We encourage people to be open and transparent about their concerns, but if the person reporting the concern has legitimate worries about being identified then we will seek to investigate and address the issue without identifying the source of the concern.
- This procedure is for use when the person reporting the concern believes in good faith that one of the issues in the first column of the table below may be occurring and the conditions in the second column are satisfied.
- There need not be hard evidence to justify the concern and the reporting person may not know what steps are being taken.
- A person reporting a concern under this procedure in good faith will not suffer any detriment as a result of reporting it. On the contrary, colleagues are to be encouraged and applauded for raising legitimate concerns as it protects individuals and Valleys to Coast from risk.

Issue	Conditions for using this procedure
One or more people are at risk of injury or death including where a child, young person or vulnerable adult is at risk of neglect	The person reporting the concern does not believe or is not convinced, in good faith that the risk being addressed at all or adequately or with sufficient urgency leaving a person or the organisation exposed to risk
Property of Valleys to Coast or a customer is at risk of being damaged by our actions or inaction	The person reporting the concern does not believe or is not convinced, in good faith, that the risk being addressed at all or adequately or with sufficient urgency leaving the property or the organisation exposed to risk
Dishonesty, corruption, theft or fraud may be occurring or is occurring	The person reporting the concern believes in good faith that this is or may be occurring and that the organisation or its property, assets or finance are at risk
Some other improper behaviour may be occurring including anything illegal, breach of proper procedures, breach of duty, harassment or bullying	The person reporting the concern believes in good faith that this is or may be occurring and the organisation is at risk

If you think your concern cannot be categorised in the table here, but you remain concerned, we encourage you to raise it anyway.

Who should concerns be reported to:

Concerns may be reported under this procedure to any of the following (regardless of whether that person has any direct responsibility for the area in question):

- Any Service Director
- The Chief Operations Officer
- The Chief Finance Officer
- The Chief Executive.

If the concern relates to the behaviour of one of the Executive Team then the concern may be reported to the Chair of the Board or Chair of the Audit and Risk Committee.

Colleagues with enhanced responsibilities to report concerns.

The following post holders have a compliance oversight within their responsibilities which means they have a specific responsibility within their job to protect the organisation from risk and, as such, they have a responsibility to report concerns within their field of operations:

- All Service Directors and EMT;
- The Procurement Business Partner;
- The Governance and Assurance Manager (including data protection);
- The Director of Corporate Services and HR Business Partners;
- The Finance Director and Finance Managers;
- The Director of ICT;
- The Health and Safety Business Partner and Health and Safety Officer;
- The lead officer for **each** of the tenant safety compliance areas such as fire, gas, electrics, etc;
- Property Managers managing major works sites.

Internal audit

As part of their commission, the internal and external audit services are required to raise any immediate concerns with the Chief Executive or Chair of Audit and Risk Committee whether or not these relate to the scope of their commissioned work.

Customer concerns

We will work to ensure that any customer concerns about safety issues will be:

- Correctly identified by staff receiving it as a safety concern;

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- Logged as such in a way that enables it to be identified as a safety issue;
- Reviewed and assessed by a responsible officer;
- Actively managed until resolved;
- Logged in such a way that reports can be generated on the nature of concerns being raised and the actions and timing of resolution being taken;
- Reported back to the tenant on the action taken.

Contractors concerns

We will work to ensure that any contractor concerns about safety issues will be:

- Correctly identified by staff receiving it as a safety concern;
- Logged and recorded as part of our contract management system;
- Reviewed and assessed by a responsible officer;
- Actively managed until resolved;
- Logged in such a way that reports can be generated on the nature of concerns being raised and the actions and timing of resolution being taken.

Investigation and action

When a concern is reported the following will take place:

- The person receiving the concern will document it;
- They will escalate and/or handover the matter as appropriate within the Strategic Leadership Team;
- A decision will be made carefully on how to investigate and check if the concern is valid taking account of any legitimate worries of the person reporting about being identified;
- If the concern is valid, a decision will be made on how to address it;
- Where possible and where this does not conflict with confidentiality requirements, the person raising the concern will be informed of the action being taken;
- Once any risk has been mitigated, a review will take place on whether any changes are required to internal controls or management arrangements to avoid any repetition or similar instance occurring.