

## Feedback summary – Comments, Compliments and Complaints and Whistleblowing Policy

**Bold=feedback** *italics=document extracts for context.*

Source	Feedback received	Response to feedback
Professional Standards Department 09/04/2019	<p><i>Whistleblowing Policy</i> <i>Deal with legitimate allegations effectively and in a timely manner – change to</i> <b>Shouldn't this be 'all' allegations effectively and in a timely manner?</b> <i>Deal seriously with vexatious allegations, including use of the Service's Disciplinary</i> <b>Use of word seriously and use of disciplinary procedures is an open threat. The statement is important and the point made without using either but adopting same principle as the earlier bullet point.</b></p> <p><b>I note it is captured at para 4.1 however consideration of a 4<sup>th</sup> point here - To identify any organisational learning and take appropriate measures to improve overall service for users and employees</b></p> <p><i>Comment, Compliments and Complaints policy</i> <i>Complaints are an expression of discontent or dissatisfaction affecting any member of the public, groups of individuals or an organisation regarding the standard of service, actions or lack of action by the Authority or by its staff.</i> <b>This is very broad and means anyone can complain – within the Police service there is a tighter definition namely;</b></p> <p><b>A complaint may be made by any of the following;</b></p> <ol style="list-style-type: none"> <li><b>1. A member of the public who claims the conduct alleged took place in relation to him or her.</b></li> <li><b>2. A member of the public who claims to have been adversely affected by the conduct, even if it did not take place in relation to him or her</b></li> <li><b>3. A member of the public who claims to have witnessed the conduct</b></li> <li><b>4. A person acting on behalf of someone who falls within any of the above. (written consent required)</b></li> </ol> <p><b>Also define who cannot make a complaint i.e.</b></p> <p><b>Anyone who was under the direction and control of the Chief Fire Officer at the time of the alleged conduct/incident</b></p> <p><i>there are a small number of complainants, who, because of the frequency of their contact with the Authority</i> <b>Would this include 'and having a disproportionate impact on the service'.</b> <i>we refer to as 'unreasonably persistent complainants'. In these exceptional circumstances we will take action to limit their contact with our Service.</i> <b>Rather than restricted to persistent consider broadening to vexatious and repetitive.</b></p>	<p>Amended to:- Deal with all allegations appropriately, effectively and in a timely manner</p> <p>Statement removed.</p> <p>Point added to Service responsibilities.</p> <p>No amendment made. These new policies are aiming to encourage feedback, preference is not to restrict who can provide it.</p> <p>Amended to 'there are a small number of complainants, who, because of the frequency of their contact or persistent nature of the contact with the Authority, we refer to as 'unreasonably persistent complainants'. In these exceptional circumstances we will take action to limit their contact with our Service</p>

	<p><i>Comment, Compliments and Complaints procedure within 20 working days</i></p> <p><b>I note a timeframe of 20 days to log an appeal/review of the investigation outcome.</b></p> <p><b>Under para 2.3</b>  <b>How will your complaint be handled? reference is made to adhering to same standards and timings outlined in the guidance albeit I can find no other reference to timeframes only one imposed on the complainant for raising an appeal.</b></p> <p><b>Has the Chief Fire Officer / or is it nationally set that complaints will be finalised within a set period?</b></p>	<p>5 working days to acknowledge  20 working days for investigating and responding.  20 working days to log an appeal  All detailed in the procedure document.</p> <p>No nationally set period.</p>
FRSA	No feedback received to date	
FOA 1/4/2019	<p><b>As discussed, the FOA have no comments/issues to raise regarding the Whistleblowing Policy and Comments, Compliments and Complaints Policy.</b></p> <p><b>Thank you for giving us the time to look at these.</b></p>	Noted
FBU 7/3/19	<p><b><u>Whistleblowing</u></b></p> <ul style="list-style-type: none"> <li>• <b>How we define a disclosure?</b></li> <li>• <b>Vexatious allegations.</b></li> <li>• <b>Allegation raised in good faith (reasonably believes - that the information disclosed, and any allegation contained in it, are substantially true.).</b></li> <li>• <b>Who the disclosure should be reported to &amp; who should be aware of any disclosure?</b></li> <li>• <b>Whether personal gain is the motivation for making the disclosure or whether personal gain is just a consequence of the disclosure.</b></li> <li>• <b>Reporting of misconduct &amp; gross misconduct?</b></li> </ul> <p><b><u>Compliments and complaints</u></b></p> <ul style="list-style-type: none"> <li>• <b>The requirement to name an investigating officer.</b></li> <li>• <b>What information is provided to a complainant following an investigation?</b></li> <li>• <b>Why two appeals?</b></li> </ul>	<p>Raising concerns about misconduct within an organisation  Concerns that can be raised include but are not limited to:-</p> <p>Unsafe working practises/conditions  Impropriety  Breach of procedure or policy  Neglect of duty  Breach of acceptable standards of ethical/professional conduct  A criminal offence  Suspicion of fraud  A bullying culture (across a team or organisation rather than an individual instance which should be managed against the Bullying and Harassment Policy)  Inadequate training or induction for staff  Deliberate concealment of information in relation to any of the above.</p> <p>Disclosure routes are detailed in the Whistleblowing procedure</p> <p>Reporting of misconduct/gross misconduct by staff should be reported under the Grievance Policy in the first instance</p> <p>The Investigating Officer is named to the complainant in their acknowledgement letter.</p> <p>Following investigation the findings and reasons for the findings are provided to the complainant.</p>

		1 appeal and then referral if the complainant choses to the Ombudsman. Wording in policy amended to be clearer.
Unison 19/2/2019	<p><b>Thank you for the attached documents. I have looked through them and everything looks fine to me. If there have been any contentious issues raised I would be grateful if you would let me know.</b></p> <p><b>Kindest Regards</b> <b>Branch Secretary</b></p>	Noted
Feedback – Working Group 05/03/2019	<p><b>Who logs Whistleblowing reports and outcomes? These can be reported to multiple sources e.g. Line Manager, Monitoring Officer etc</b></p> <p><b><u>Umbrella Document</u></b></p> <p><b>Expand Chief Fire Office section to Chief Fire Officer and Principle Officer</b> <b>Incorporate avenue for complaints against the Deputy PFCC</b> <b>Incorporate avenue for complaints against the Monitoring Officer</b> <b>Add appeal avenue for complaints against the CFO and Principle Officers</b> <b>Add contact details for Safeguarding Complaints (email/telephone?)</b></p> <p><b><u>Whistleblowing Procedure</u></b></p> <p><b>Remove or adapt external contact options.</b> <b>Add Performance Monitoring to Section 7 and ensure details of dip sampling by PFCC for process scrutiny</b></p> <p><b><u>Comments, Compliments and Complaints Policy</u></b></p> <p><b>Add Performance Monitoring to Section 6 and ensure details of dip sampling by PFCC for process scrutiny</b></p> <p><b><u>Comments, Compliments and Complaints Procedure</u></b></p> <p><b>Change word escalate to appeal (pg2)</b> <b>Change Department Director to Appeals officer (pg2)</b></p> <p><b>Expand Appeals Officer to be as near to source as possible, an appropriate level to conduct the appeal will be selected as near to source as possible.</b></p> <p><b>Expand complaints against the CFO and Principle Officers with handling and appeal procedure.</b></p> <p><b>Adapt Section 7 (pg 6) to include the Authority will dip sample/review cases</b></p>	<p>Central Register held by Information Officers in the Performance and Data Team, procedure amended to include requirements of person handling the whistleblowing report to notify Information Officers for logging only.</p> <p>Amendments actioned.</p>
Hope Osayande – Data Protection	<p><b>Thank you for these.</b></p> <p><b>I have looked at these documents and they look OK to me.</b></p>	Noted

Officer and Management responsibility for Compliment and complaint handling staff 13/2/19		
Colette Black 6/0/18	<b>General Grammatical and typing amends</b>	Actioned
Nikki Geaves – Equality and Diversity Lead	<b>These policies and procedures have been subjected to an Equality Impact Assessment and has been graded as having low potential impact. The assessment concluded that the proposals in these documents would have no potential or actual differential impact on grounds of race, ethnicity, nationality, gender, transgender, disability, age, religion or belief or sexual orientation.</b>	Noted and incorporated into policy documents