Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final

1.   Title of proposal

Introduction of new Whistleblowing Policy and Toolkit – **Final** IIA

2.   What will change as a result of this proposal?

An updated policy will be introduced, and a new toolkit will be introduced. There are not a great number of changes, because there is already an existing policy which has been in operation for a number of years. The main changes include:

1. The introduction of speak up supporters to WB process.
2. New early resolution process for straightforward concerns.
3. Enhancement of '500 disclosures' and associated processes.
4. Greater input from Safecall as a critical friend for more complex internal investigations.
5. The new toolkit to give more information about the procedure and what to expect.
6. New associated learning modules that will be launched alongside the refreshed policy and new toolkit, including a video module.

3.   Briefly describe public involvement in this proposal to date and planned

As the proposal will not affect members of the public (internal policy and toolkit only), public involvement is not required. However, extensive consultation on the proposals has taken place with our trade union partners (who have had input on the drafting of the documents) and with the Councillors who sit on the Council's Governance, Risk and Best Value Committee.

4.   Is the proposal considered strategic under the Fairer Scotland Duty?

The proposal is unlikely to be considered strategic under the Fairer Scotland Duty but, in any event, as part of the IIA we did consider whether the proposals would or could reduce inequalities of outcome caused by socio- economic disadvantage.

5.   Date of IIA

27 September 2023

6.   **Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)**

Name	Job Title	Date of IIA training
Abigail Drummond, Facilitator and Lead Officer	Senior Solicitor	6 September 2023
Laura Turton	Senior HR Consultant	6 December 2023
Caroline McKeller	Resources and Talent Consultant (Equality and Diversity Specialist)	2 November 2023
Richard Thrall	Governance Officer	7 November 2019

7. **Evidence available at the time of the IIA**

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	The new policy and toolkit will affect the whole of the Council's staff cohort so we were mindful that this may include people in need.	All groups will potentially be impacted.
Data on service uptake/access	We had statistics on the number of WB complaints raised each year from 2018 to date.	The evidence gave us an overview on the number of WB raised. It does not have a breakdown as to what type of people/ groups raised a WH complaint (they are often raised anonymously).
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	The new policy and toolkit will affect the whole of the Council's staff cohort so we were mindful that this would be applicable to staff who work in the lower grade jobs and may experience low income/ wealth or material deprivation.	All groups will potentially be impacted.
Data on equality outcomes	We were in receipt of statistical demographic information on our staff body in relation to protected characteristics from our equality and diversity	All groups will potentially be impacted.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	framework (this was dated 2020).	
Research/literature evidence	The 'Tanner Report' following the Independent Inquiry and Review conducted by Pinsent Masons LLP and overseen by Inquiry Chair Susanne Tanner KC (the Independent Inquiry). This Report set out recommendations for changes to our WB process.	All groups will potentially be impacted.
Public/patient/client experience information	Not applicable	Not applicable
Evidence of inclusive engagement of people who use the service and involvement findings	There was extensive feedback provided by users of the WB service throughout the Independent Inquiry which led to various recommendations as part of the Tanner Report.	The evidence gathered led to specific recommendations which have all been considered and implemented in the new policy, toolkit and associated learning modules and recording/ reporting mechanisms.
Evidence of unmet need	There was no evidence of unmet need as such, with a robust WB process already in place. There were, however, improvements that could be made to the service which were identified.	The improvements have been implemented through the new policy, toolkit, introduction of speak up supporters and associated learning modules.
Good practice guidelines	The new Policy and Toolkit are compatible with the principles set out in the UK Governments Whistleblowing Guidance for Employers and Code of Practice found here	
Carbon emissions generated/reduced data	Not applicable	Not applicable
Environmental data	Not applicable	Not applicable
Risk from cumulative impacts	Not applicable	Not applicable
Other (please specify)	Not applicable	Not applicable

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Additional evidence required	None	No further information required- we consider that this can be a final IIA.

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
Positive The new policy and toolkit provide a variety of ways to report concerns e.g. raising a complaint to manager, HR, governance team, Speak- Up supporters, Safecall. Previously the policy focussed on raising complaints with Safecall which may have been perceived as very formal and seen as a barrier. This broader approach may make it easier for people with disabilities to raise a complaint – positive impact. The new policy and toolkit are more accessible – it is easier for people to understand the process through toolkit, and a digital video module that will go along with it, which may assist people who are neurodiverse or have low literacy levels. The Speak Up Supporters can assist too. It has clear guidance on different steps and who is involved. The orb Gateway Project has increased access to the Orb. This may have a positive impact on Disabled people and people who do not speak English as a first language. The Speak Up Supporters are a diverse group and include men, women and people of different ages and ethnicity. This may make people feel more comfortable in raising concerns if they can speak to someone who is not a manager about it informally to begin with. The Orb gateway project which increases access to the orb for frontline workers and the associated toolbox talks will have a positive impact on those who do shift work/ parttime and will allow them access to the information about whistleblowing.	Disabled people (includes physical disability, learning disability, sensory loss, long-term medical conditions, mental health problems) Minority ethnic people (includes Gypsy/Travellers, migrant workers, non-English speakers) Men (include trans men), Women (include trans women) and non-binary people. (Include issues relating to pregnancy and maternity including same sex parents) **Staff** • Full-time • Part-time • Shift workers

Equality, Health and Wellbeing and Human Rights	Affected populations
For those who still do not have access to the Orb there will also be a page on the external website which will link to an Edinburgh Specific landing page naming CEC and Safecall and will outline timelines and processes which again improve accessibility. As part of our public sector equalities duties, we want to foster a culture that encourages people to speak up and feel confident in doing so. The WB policy and Toolkit are pro participation and assist in creating a culture of openness where no one is above reproach. The enhancement of the '500 Disclosures' processes and the alternative method of investigating them with increased independence will give people comfort and confidence that matters are being investigated in an impartial manner. This will help foster good relations – positive impact. In terms of wellbeing and mental health, the introduction of speak up supporters and knowing that people are supported to speak up may have a positive impact on wellbeing and mental health. In addition, the introduction of the early resolution process should lead to better management/staff relationships as positions will not become so entrenched which will have a positive mental health impact.	• Staff with protected characteristics • Staff vulnerable to falling into poverty All Staff
Negative None identified.	

Environment and Sustainability including climate change emissions and impacts	Affected populations
Positive The introduction of the 15-day early resolution process may cut down what is a lengthy manual process, reducing the amount of time on laptops/ reduce need for producing reports that are 100s of pages long. This may lead to some energy efficiency savings.	Positive environmental impact
Negative None identified.	

Environment and Sustainability including climate change emissions and impacts	Affected populations

Economic	Affected populations
Positive The increased accessibility with the online digital module will assist those with low literacy- positive impact. The fact that any complaint of domestic or other physical or sexual abuse is now routinely reported to the Monitoring Officer will have a positive impact and ensure that trends are picked up and reported.	Those vulnerable to falling into poverty: eg have low or no wealth, on low income, live in areas of deprivation, experiencing material deprivation (socio-economic disadvantage)
Negative None Identified.	

9.   Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?

Part of this service will be carried out by Safecall, a third-party Whistleblowing Investigation provider. Safecall were consulted with in the drafting of the new Policy and Toolkit and were informed of the recommendations following the Tanner Report and are fully aware of the Council's position towards equality, environmental and sustainability matters.

10.   Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

The policy and related learning will be communicated to colleagues through a range of current digital channels including:
-    The Orb
-    News Beat
-    Manager's News
-    Colleague News

The policy will also be included in printed materials and at in-person events for non-digitally enabled colleagues, including:

-    leaflets, posters and stickers highlighting Our Behaviours, Speak Up Supporters and ways of raising concerns for depots, fleet vehicles and events

- information cards about speaking up and how to do so for new staff card holders
- Speak Up representative at colleague Wellbeing Roadshow (November 2023)
- team talk toolkits provided to managers to discuss with team members.

All communications will comply with our 'house style', best practice writing guidelines and current accessibility standards.

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a <u>Strategic Environmental Assessment</u> (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

Not applicable

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

No further evidence is required.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Introduction of Speak Up Supporters to organisation	Richard Thrall, Governance Officer	Already launched	Feb 2024
Implementation of new Policy and Toolkit	Nick Smith, Service Director Legal and Assurance	End Jan 2024	Feb 2024
Communications/ Learning programme launched	Simone Duffy, Senior Communications Officer	End Jan 2024	Feb 2024

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?
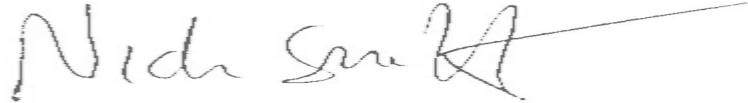
No.

15.   How will you monitor how this proposal affects different groups, including people with protected characteristics?

The number of whistleblowing complaints will continue to be monitored by the Council's Governance Team with quarterly reports being made to the Council's Governance, Risk and Best Value Committee.

16.   Sign off by Head of Service

Name

Date   14 November 2023

17.   Publication

Completed and signed IIAs should be sent to: integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments
Edinburgh Integration Joint Board/Health and Social Care
sarah.bryson@edinburgh.gov.uk to be published at www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/