

WHISTLEBLOWING POLICY

Policy and Guidance for Whistleblowers

Date: February 2018

Document Control

Title	Greater Manchester Combined Authority – Whistleblowing Policy
Document Type	Anti-Fraud and Corruption Policy
Author	Tom Powell, GMCA Head Audit and Risk Management
Owner	GMCA Head of Audit and Risk Management
Management Approval	GMCA Treasurer
Committee Approval	Audit Committee and Standards Committee
Protective marking	None
Date of Approval	Last approved July 2017 Updated for approval by Standards Committee March 2018
Review due	Two years from date of approval or earlier if there are relevant legislative or organisational changes which impact on this policy.

Contents

- 1) Introduction
- 2) Aims and Scope
- 3) What is Whistleblowing
- 4) Making a Disclosure or Raising a Concern
- 5) How To Report a Whistleblowing Concern
- 6) How The Authority Will Respond
- 7) Outcomes
- 8) Safeguards
- 9) Data Protection and FOI
- 10) Monitoring of Whistleblowing Complaints
- 11) Training and Awareness
- 12) Frequently Asked Questions
- 13) Appendix 1 – Whistleblowing Report
- 14) Appendix 2 – Nolan Principles

Introduction

Greater Manchester Combined Authority (GMCA) is committed to the highest possible standards of honesty, openness and accountability and will not tolerate malpractice or wrongdoing.

The GMCA's Whistleblowing Policy is a vital element of our governance arrangements and is designed to allow those employed by the GMCA and/or members of the public to come forward and raise both disclosures and serious allegations of wrongdoing involving the actions of GMCA employees, Members, contractors or any aspect of the GMCA's activities. The policy also extends to the activities of the Greater Manchester Local Enterprise Partnership (GM LEP), its Board Members and staff. The GM LEP works in partnership with GMCA and as such is covered under the requirements set out in this policy.

The GMCA is committed to a policy which seeks to protect those individuals who make certain disclosures with regard to any instance of malpractice or wrongdoing and to investigate them in the public interest.

Whistleblowing is generally the term used when someone who is employed in an organisation reports a concern about suspected wrongdoing, malpractice, illegality or risk in the workplace.

This can include:

- criminal offences;
- failure to comply with a legal duty;
- miscarriages of justice;
- fraud or corruption;
- abuse of authority;
- serious breaches of authority or procedure;
- unethical conduct and actions deemed unprofessional or inappropriate; this could include breaches of regulations and of the 'Nolan Principles' which are the basis of ethical standards expected of public office holders (Appendix B);
- the health and safety of any individual has been, or is likely to be, endangered;
- the environment has been, is being or is likely to be, damaged (as a result of the GMCA's actions or inactions); and
- information about any of the above has been, is being, or is likely to be, deliberately concealed.

This policy seeks to set out how the GMCA will handle and respond to serious allegations of perceived wrongdoing irrespective of whether the individual raising the concern is employed by the GMCA or not.

Aims and Scope

Our Whistleblowing Policy seeks to cover all disclosures and allegations made by employees of the GMCA, including temporary and agency staff.

It also extends to any other individual who wants to raise an allegation of perceived wrongdoing. This could include consultants, contractors, sub-contractors who are engaged in work for the GMCA or anyone who uses the GMCA's services or any member of the public. The policy also allows for disclosures and allegations either from or in relation to the activities of the GM LEP, LEP Board Members and staff.

This policy has specific sections to advise those employed by the GMCA and members of the public of the process to be followed when raising a disclosure or allegation and how the GMCA will respond.

The policy seeks to:

- provide for a culture of zero tolerance toward fraud and corruption and deter wrongdoing;
- encourage employees and others with serious concerns about any aspect of the GMCA's work to feel confident to come forward and voice those concerns;
- raise concerns at an early stage and in the right way ensuring that critical information gets to the people who need to know and who are able to take action;
- provide safeguards to reassure those who raise concerns in the public interest and not maliciously or for personal gain, that they can do so without fear of reprisals or victimisation or disciplinary action, regardless of whether these are subsequently proven;
- set out how the GMCA will respond to allegations made and enable them to get feedback on any action taken;
- ensure that employees know what to do if they are not satisfied with actions taken.

The Whistleblowing Policy is not to be used where other more appropriate internal reporting procedures are available. There are existing procedures which enable employees to lodge a grievance relating to their conditions of employment, raise matters of harassment or to make a general complaint, which by contrast, generally have no additional public interest dimension.

This Policy covers concerns that fall outside the scope of those existing internal procedures. Equally, any allegations made through the above procedures, which raise serious concerns over wrongdoing, the GMCA will investigate under the whistleblowing process.

What is Whistleblowing?

Whistleblowing is the confidential disclosure by an individual of any concerns relating to a perceived wrongdoing involving any aspect of the GMCA's work or those who work for the GMCA. The

whistleblowing process assists individuals, who believe they have discovered malpractice, impropriety or wrongdoing, to raise a concern, in order that this can be addressed.

The **Public Interest Disclosure Act 1998 (PIDA)** is known as the whistleblowing law and is designed to encourage and enable employees to “speak out” and to report suspected wrongdoing at work. This is commonly known as “blowing the whistle”.

PIDA legislation legally protects employees, temporary workers and agency staff from any detriment from their employer or colleagues that arises as a result of making a “protected disclosure” (a qualifying disclosure) in the public interest. This includes protection from harassment, victimisation or dismissal by their employer.

A qualifying disclosure means any disclosure of information made to the GMCA or other prescribed person, which in the reasonable belief of the worker making the disclosure, is made in the public interest and tends to show one or more of the following;

- (a) a criminal offence has been committed, is being committed or is likely to be committed;
- (b) a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- (c) a miscarriage of justice has occurred, is occurring or is likely to occur;
- (d) the health or safety of any individual has been, is being or is likely to be endangered;
- (e) the environment has been, is being or is likely to be damaged; or
- (f) information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

A disclosure of information is not a qualifying disclosure if the person making the disclosure commits an offence by making it.

A prescribed person is someone who is independent of the employee’s organisation, but usually has an authoritative relationship with the organisation, such as a regulatory or legislative body.

Whilst protection under PIDA covers most workers it is not extended to partners, contractors, non-executive directors, volunteers or the self-employed. However, the principles outlined in this policy, as far as they can be, will be applied to whistleblowing allegations received from sources other than employees of the GMCA. As with internally reported cases, particular consideration needs to be given to matters of confidentiality.

Making a Disclosure or Raising a Concern

Once an employee or other has decided to raise a concern, then wherever possible, it should be expressed either verbally or in writing. This should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the individual is particularly concerned about the situation.

Although individuals raising concerns are not expected to have supporting evidence to prove the truth of an allegation before reporting, he or she must reasonably believe that the information is substantially true to enable the matter to be taken forward.

Details of all reports received by managers should be logged and reported to the GMCA's Internal Audit Section to allow a central record of whistleblowing cases to be maintained.

Whistleblowing by employees

It is the hope and intention of the GMCA that an employee with a concern about any aspect of the GMCA's operations or its conduct, feels able to first raise those concerns internally with line management. This includes where the employee wants to make a protected disclosure. Alternatively they may contact Internal Audit (see contact details on page 8) or one or more of the officers listed below:

- Head of Internal Audit and Risk Management.
- The Chief Executive.
- The GMCA Monitoring Officer.
- The GMCA Treasurer.

Before making a disclosure, an employee may first wish to discuss the concern on a confidential basis with a work colleague, trade union representative, solicitor or professional body and seek advice on how to proceed. These discussions may help assess how justified their concern is, and if they then wish to proceed, the most appropriate and effective way to report it. This is important because the report should be made so as to allow the most effective investigation, whilst affording the whistleblower protection under the PIDA.

Additional information about PIDA law can be obtained from the whistleblowing charity [Public Concern at Work \(PCaW\)](#), which contributed to the formulation of the PIDA and is a legal advice centre designated as such by the Bar Council. For information visit www.pcaw.org.uk or telephone their advice line 020 7404 6609.

Employees are protected when they make a disclosure. In making a protected disclosure the employee must:

- reasonably believe that the disclosure they are making is in the public interest;
- reasonably believe that the information detailed and any allegation in it are substantially true; and
- the matter disclosed must fall within the matters prescribed for that regulator.

The earlier an employee expresses a concern, the easier it will be to take action. Employees should raise a concern as soon they have a reasonable suspicion and are not expected to investigate the concern themselves to prove their suspicions are well-founded.

Whistleblowing by members of the public

If you are not a GMCA employee you can still contact the GMCA to report any concerns or disclosures over wrongdoing and these will be treated in the same way. Unlike disclosures made by employees, protection under PIDA law does not extend to disclosures made by members of the public.

Where allegations are made against Internal Audit, in order to ensure impartiality and integrity of the investigation, these allegations will be immediately referred to the GMCA Monitoring Officer who will make appropriate arrangements for an independent investigation to take place. Where allegations are made which may relate to both Internal Audit and the GMCA Monitoring Officer, those allegations will immediately be referred to the Chief Executive, who will make arrangements for an independent investigation to take place.

To ensure transparency where any allegations are made in respect of Internal Audit, it will be appropriate that the Chair of Audit Committee, Treasurer and External Audit are made aware, on a confidential basis, that such allegations have been made and the arrangements that have been put in place to investigate them.

How To Report A Whistleblowing Concern

Anybody who has a whistleblowing concern relating to the GMCA or GM LEP can use our whistleblowing reporting procedures.

Any person reporting a concern should provide as much information as possible, including:

- who the allegations are against;
- full details on the nature of the alleged wrongdoing;
- provide any evidence they have in support of the allegation;
- state if the person making the disclosure is an employee of the GMCA;
- name and contact details (unless they wish to remain anonymous).

GMCA employees can report a concern through their manager if they feel confident to do so. The manager must follow the obligation of confidentiality and reporting procedures in accordance with the details included within the section 'How the Council Will Respond'.

For monitoring purposes, all whistleblowing cases referred to managers must be reported on receipt to Internal Audit. This may be done by the whistleblower, receiving manager or the senior manager investigating the allegations. Internal Audit will also offer advice and support to the appointed investigator.

Alternatively any person can report a concern regarding GMCA or GM LEP to Internal Audit via the following:

- E-mail at: internal.audit@greatermanchester-ca.gov.uk
- Telephone: **0800 694 0121**
- Use the GMCA's secure online whistleblowing reporting form.
- Concerns can also be reported in writing to:

**Head of Internal Audit and Risk Management,
Confidential
Greater Manchester Combined Authority,
1st Floor, Churchgate House**

56 Oxford Street
Manchester, M1 6EU

Internal Audit will gather as much information as possible about concerns raised from calls made to the GMCA's whistleblowing hotline. If contact details are provided we may get in touch to seek further information.

Concerns can also be raised with the GMCA Treasurer via the following:

- E-mail at: Richard.Paver@Greatermanchester-ca.gov.uk
- Telephone: 0161 778 7004

In the event that an employee does not feel comfortable in making a disclosure to the GMCA then you are entitled to make a protected disclosure to one of the prescribed organisations listed.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/183340/11-641-blowing-the-whistle-to-a-prescribed-person.pdf

How the GMCA Will Respond

An acknowledgement will be sent within 10 working days to indicate:

- how the GMCA proposes to deal with the matter; and the policy under which it will be investigated;
- whether the GMCA considers it to be a protected disclosure;
- contact details for the officer handling the investigation;
- arrangements for confidentiality;
- an estimate of how long it will take to provide a response on the outcome;
- any initial enquiries which may have been made;
- if no action is planned, why not.

All proposed action should be notified and agreed with Internal Audit on behalf of the GMCA Treasurer and in consultation with the relevant GMCA Senior Officer.

All allegations will be handled confidentially and discreetly by those managers who are directly involved in the investigating process. The ongoing point of contact for the whistleblower will be given in the acknowledgement letter.

If necessary, further information will be sought from the whistleblower. This will depend on the nature of the matters raised, the potential difficulties involved in conducting an investigation and the clarity of the information provided.

At any meeting arranged to discuss an employee's concerns the employee has the right, if they so wish, to be accompanied by their Trade Union representative or a friend who is not involved in the area to which the concern relates.

The GMCA will do what it lawfully can to minimise any difficulties that an employee may experience as a result of raising a concern. For example, if an employee is required to give evidence in criminal or disciplinary proceedings, the GMCA will advise you about the procedures in terms of what will happen and what will be expected of you.

Anonymous allegations

The GMCA recognise that there may be circumstances where individuals are worried about being identified when they report concerns about their employer. If you have come to us anonymously and not provided your contact details we will treat your allegations just as seriously. However, this policy encourages individuals to put their name to an allegation wherever possible as we believe that open or confidential whistleblowing is the best means of addressing the concerns and protecting individuals.

Concerns expressed anonymously are more difficult to investigate, and harder to substantiate, and further liaison with the whistleblower is not possible. Nevertheless, anonymous allegations will always be individually considered and action taken at the discretion of the responsible GMCA Senior Officer, Head of Internal Audit and Risk Management and/or GMCA Treasurer depending upon:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegations from attributable sources.

Outcomes

The GMCA will, subject to legal constraints, seek to advise the whistleblower on the outcomes of the investigation in order to assure them that the matter has been properly addressed. Some concerns raised may be resolved by agreed action, once the whistleblower's concerns have been explained, without the need for investigation.

Investigation reports will be required for all cases. These will usually be issued by the Investigating Officer to the Senior GMCA Officer of the department involved and to the GMCA Treasurer, GMCA Monitoring Officer and Chief Executive. Internal Audit will also require confirmation of the outcome of the work and any system risk issues which arise from it. Internal Audit may carry out follow up work as a result of any identified areas of risk.

Safeguards

In order to ensure that allegations are investigated in the right spirit with the right outcome, the following safeguards or principles should be applied in all cases.

Confidentiality and Anonymity

The GMCA's Whistleblowing Policy seeks to protect the identity of the individual making a disclosure, meaning that your name will not be revealed without your explicit consent, even if the disclosure is not considered to be a qualifying disclosure under the PIDA. Your name will initially be logged at the outset and will be visible at times when data monitoring is taking place.

However, in alleged cases of serious wrongdoing, it must be appreciated that the GMCA cannot guarantee that this will be maintained particularly if external legal action results from the disclosure. In some cases an employee's concern may require further action and they may have to act as a witness and/or provide evidence, for example serious criminal offences which are referred to the Police.

Harassment and Victimisation

The GMCA acknowledges that the decision to report a concern can be a difficult decision for an employee to take, not least because of the fear of reprisal from those responsible for the malpractice. Any employee who makes a 'qualifying disclosure' which meets the requirements of the PIDA is legally protected against victimisation or harassment for whistleblowing.

The GMCA will not tolerate harassment or victimisation against an employee who has raised a genuine concern under the whistleblowing policy. Any employee who victimises a whistleblower will be subject to a disciplinary action which may lead to dismissal.

Senior GMCA Officers should monitor how whistleblowers are subsequently treated after raising a matter of concern. They should ensure that any harassment or victimisation is dealt with under disciplinary arrangements.

Any employee who believes they have been victimised as a result of making a disclosure or blowing the whistle should report their concerns to the GMCA Monitoring Officer.

False and malicious allegations

While encouraging employees to bring forward matters of concern, the GMCA must guard against claims which are untrue. This is because of the risk of claims made to deliberately damage the reputation of other employees or the GMCA as a whole and not least because the cost of investigation is high.

If an employee makes an allegation, but it is not confirmed by the investigation, no action will be considered or taken against them. However, if an employee makes false, malicious or vexatious allegations this will be treated as a serious disciplinary offence and disciplinary action will be taken. The PIDA only offers protection from dismissal or detriment if the worker reasonably believes their disclosure was made in the public interest.

Misuse of the policy

The whistleblowing policy is designed to promote and encourage reporting genuine concerns. The policy is not designed to allow:

- individuals who have acted inappropriately to escape punishment by highlighting any malpractices they were involved in;
- employment protection in relation a redundancy situation or pre-existing disciplinary issues as a result of reporting a wrongdoing;
- an individual to raise a concern for some private motive and not to prevent or correct the wrongdoing.

Data Protection and FOI

The Freedom of Information Act 2000 gives a general right of access to all types of recorded information held by public authorities. As such the GMCA often receives requests for information under the Freedom of Information Act.

The GMCA has a legal obligation to provide the information unless it falls under one of the exemptions of the Act.

The Freedom of Information Act contains exemptions which may be applicable to permit the withholding of information identifying the whistleblower, including:

- Section 40 Personal Data;
- Section 41 Information which, if disclosed, would give rise to an actionable breach of confidence.

Many people making a disclosure to the GMCA will wish to protect their identity and the GMCA will always seek to protect the identity of individuals during the course of progressing an investigation. If the GMCA receives a request for information identifying a whistleblower, the GMCA will contact the whistleblower to seek their views beforehand and will, wherever possible, seek to comply with those views.

The principle of maintaining confidentiality should also be applied to the identity of any individual who may be the subject of a disclosure.

The GMCA will ensure that our handling of concerns meets the requirements of the Data Protection Act 1998 and the Freedom of Information Act 2000.

Monitoring of Whistleblowing Referrals

Internal Audit will maintain a central record of all whistleblowing referrals made under this policy and monitor the outcome of these cases. The collection, monitoring, review and storage of these records will at all times be carried out in accordance with the GMCA's Data Protection and Information Management Policies.

As such, details of any allegation should be reported to Internal Audit by the receiving manager on receipt. Internal Audit will log and allocate each case a reference number whether or not Internal Audit are involved in the investigation work. The outcome of the investigation should be notified to Internal Audit by the Investigating officer.

The records held by Internal Audit will be used to analyse the impact and effectiveness of the arrangements in place. The detailed case records form part of the process of reporting back to

Members on the effectiveness and outcomes of the Policy and form the record of actions taken in the case of any matters raised under the Public Interest Disclosure Act. This information will be referred to for monitoring purposes and periodic assurance reports provided to the Audit Committee by the Head of Internal Audit and Risk Management as part of this process.

The GMCA Treasurer and the Chief Executive retain responsibility for monitoring the effectiveness of the GMCA's whistleblowing policy and process. The Standards Committee has an overview of the Policy.

Whistleblowing referrals in respect of the GM LEP and any actions required to investigate these will be reported to and agreed with the LEP Chair and/or the GMCA Monitoring Officer on behalf of the GM Mayor.

A whistleblowing record sheet (Appendix A) should be used to record a summary for each case. A copy should be sent to Internal Audit and one retained with the investigation paperwork on completion.

Training and Awareness

Senior GMCA Officers are responsible for ensuring that their employees are aware of the whistleblowing policy and process and that any training needs are addressed which may arise from the application of the policy. Raising awareness of the GMCA's Whistleblowing Policy should form part of the induction training for all employees and should be addressed as refresher training for all employees.

Employees have a responsibility to ensure that they are aware of and understand the GMCA's policy in relation to whistleblowing.

Frequently Asked Questions

What is the difference between whistleblowing and making a complaint or grievance

In general terms, whistleblowing occurs when an employee raises a concern about danger or illegality that affects others and which has a public interest dimension to it. The person blowing the whistle is usually not directly or personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concerns. As a result, the whistleblower should not be expected to prove their case; rather he or she raises the concern so others can address it.

A grievance or private complaint is, by contrast, a dispute about the employee's own employment position and has no additional public interest dimension. When someone complains, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint, and, for this reason, is expected to be able to prove their case.

For example – bullying and discrimination issues should be dealt with under the respective policy or under grievance procedure.

Can concerns be raised confidentially or anonymously?

The GMCA encourages whistleblowers to identify themselves and raise concerns openly. Openness makes it easier for the GMCA to assess the issue, work out how to investigate the matter, understand any motive and get more information. The effectiveness of any whistleblowing investigation may be limited where an individual chooses not to be identified.

An individual raises a concern confidentially if he or she gives his or her name on the condition that it is not revealed without their consent. An individual raises a concern anonymously if he or she does not give his or her name at all. Clearly, if the GMCA does not know who provided the information, it is not possible to reassure or protect them.

Does the Public Interest Disclosure Act (PIDA) require an employer to keep a whistleblower's identity secret?

The simple answer is no - PIDA contains no specific provision on confidentiality. The protections within the Act can be deemed to encourage employees to raise issues openly. A good whistleblowing policy will provide a confidential port of call for a worried employee and employers should respect any promise of confidentiality they make. However in some cases it will be impossible to take action on the concern without the open testimony of a whistleblower. Further it may later become necessary to waiver anonymity because of the course of the investigation for example if the matter has had to be referred to the police.

Who is protected?

The following people may be protected:

- employees;
- agency workers;
- people that are training with an employer, but not employed;
- self-employed workers, if supervised or working off-site.

A worker will be eligible for protection if (all these apply):

- they honestly think what they're reporting is true;
- they are telling the right person;
- **they believe that their disclosure is in the public interest.**

Am I protected from dismissal if I blow the whistle?

A worker cannot be dismissed because they blow the whistle. If they are, they can claim unfair dismissal - they'll be protected by PIDA law as long as certain criteria are met.

The types of whistleblowing eligible for protection are called 'qualifying disclosures'. They include when someone reports:

- that someone's health and safety is in danger;
- damage to the environment;
- a criminal offence;
- that the company is not obeying the law (like not having the right insurance);
- that someone's covering up wrongdoing;
- there has been or is likely to be a miscarriage of justice.

Who is not protected?

A worker will not be protected by PIDA in the following circumstances:

- they break the law when they report something, for example because they signed the Official Secrets Act;
- they were part of the wrongdoing;
- they found out about the wrongdoing when someone wanted legal advice ('legal professional privilege'), for example if they are a solicitor
- its not in the public interest.

Workers who are not employees cannot claim unfair dismissal because of whistleblowing, but they are protected and can claim 'detrimental treatment'.

What information should a whistleblower provide?

Supporting evidence for the allegations, if available, is clearly helpful. However, PIDA does not require individuals to have evidence before reporting the matter, but it does say that the individual must reasonably believe the information is substantially true. Individuals should report concerns to line management or other at the earliest opportunity rather than wait to collate any evidence.

Whistleblowers are encouraged to provide their contact details to allow the GMCA to seek further information, where necessary and advise on outcomes.

Where can I get independent advice?

Individuals can contact the independent charity Public Concern at Work for free, independent and confidential advice, for example to find out what is protected by PIDA and how best to raise concerns. The charity runs a UK helpline on their advice line tel: 020 7404 6609 or visit their website www.pcaaw.org.uk

Appendix 1

Greater Manchester Combined Authority Whistleblowing Report	
<p>The date the concern / allegation / disclosure was received in the GMCA.</p> <p>Service involved.</p> <p>How the report was received (verbal or written).</p>	
<p>Details of who the concerns were raised with?</p> <p>Name and job role.</p>	
<p>Name and job role of employee making complaint/allegation: (unless anonymity was requested).</p>	
<p>Was confidentiality requested / explained or promised?</p>	
<p>A summary of the concern / allegation raised:</p>	
<p>Details of any feedback given and any response from the employee</p>	
<p>Matter reported to Head of Internal Audit and Risk Management (Yes/No). Date referred:</p>	
<p>Has formal acknowledgement provided to employee in line with the policy? (Acknowledgement of receipt within 10 working days).</p>	

Senior GMCA Officer and Officer handling the investigation: (Names)	
Summary outcome of investigation: (Proved not proved, action plans and recommendations)	
Date notification of outcome given to employee:	
Papers retained (location), responsible officer and review date:	

Appendix 2

SEVEN NOLAN PRINCIPLES

The following are the Seven Nolan Principles underpinning standards for Public Life:

The principles of public life apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the civil service, local government, the police, courts and probation services and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public services. The principles also have application to all those in other sectors delivering public services.

1. Selflessness: Holders of public office should act solely in terms of the public interest.
2. Integrity: Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
3. Objectivity: Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
4. Accountability: Holders of public office are accountable to the public for their decisions and actions and must admit themselves to the scrutiny necessary to ensure this.
5. Openness: Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
6. Honesty: Holders of public office should be truthful.
7. Leadership: Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Source: The Committees website is at <http://www.public-standards.gov.uk/>