

Response to Request for Information

Reference FOI 031645
Date 8 March 2016

Bullying and Harassment Policies and Potentially Violent Persons Register

Request:

Please provide any and all existing policies, procedure guidelines and best practice guidelines on the Council's bullying and harassment policies as it relates to staff.
[Please see information provided on the next page.](#)

Wolverhampton City Council



Human Resources Policy Framework

Bullying and Harassment (Dignity at Work) Policy and Procedure

Approved by:	<i>Cabinet Resources Panel (27.11.2012)</i>
<i>Published:</i>	<i>01.02.2013</i>
<i>Review date:</i>	<i>01.02.2014</i>

CONSULTATION

The following officers and/or bodies have been consulted on this policy:

Officers and/or Bodies	From	To
HR	13.09.2012	30.10.2012
CDB	08.08.2012	30.10.2012
SEB	18.10.2012	
PGSS	30.10.2012	

The following Trade Unions have been consulted on this policy:

	From	To
Unison	16.10.2012	06.11.2012
GMB	16.10.2012	06.11.2012
Unite	16.10.2012	06.11.2012

REVIEW LOG

Date	Version	Comments	Approved by
25.01.2013	0.6	Check & Review	
02.10.2012	0.6	Following moderation - LH	
13.09.2012	0.5	Redrafted with comments from SB, LM	
02.09.2012	0.4	Revisions with AD's comments	
02.08.2012	0.4	VLH	
30.07.12	0.3	VLH	
10.07.2012	0.2	VLH revisions/ comments	
14.05.2012	0.1	Redrafted with comments from HR and Ads	

EQUALITY ANALYSIS

An equality analysis has been carried out on this policy and procedure. Contact HR Strategy and Policy Team for a copy. Contact HR on 01902 552345 or by email on HR.supportdesk@wolverhampton.gov.uk for HR advice.

ADVICE

Contact HR on 01902 552345 or email HR.supportdesk@wolverhampton.gov.uk for HR advice.

COMMENTS AND AMENDMENTS

Contact HR on 01902 552345 or email HR.supportdesk@wolverhampton.gov.uk to make any comments or suggest any feedback on this policy.

DISTRIBUTION

This policy and procedure is placed on the HR intranet for managers and employees to view. Copies will be provided to recognised Trade Unions and managers electronically.

INDEX

Section	Pages
1. Policy Statement	3
2. Scope	3
3. Principles	4
4. Procedure	4
Informal Action	4
Mediation	5
Formal Action	5
Right to be Accompanied & Confidentiality	7
5. Roles and Responsibilities	7
Employees	7
Managers	8
HR	8
Trade Unions	8
6. Training and Awareness	8
7. Monitoring and Review	9
8. Links to other Policies and Procedures	9
9. Equality	9
Appendix 1 Bullying and Harassment Form	10
Appendix 2 Process Chart	11
Glossary	12

1. Policy Statement

- 1.1 Wolverhampton City Council (the Council) is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect.
- 1.2 We recognise that harassment and bullying can have serious consequences for employees and the organisation. Harassment or bullying may make people unhappy, can cause stress, affect their health and wellbeing, family and social relationships, as well as have an impact on their performance at work.
- 1.3 The effects on the organisation can include loss of morale, poor work performance, and increased turnover of staff, legal claims and damage to the Council's reputation.

2. Scope

- 2.1 This policy and procedure applies to all employees of the Council, and shall be followed in respect of all grievances of individual employees, including Chief Officers and employees based in schools i.e. teaching assistants, but excludes teachers covered by the Schools' Bullying and Harassment policy & procedure
- 2.2 The policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, e.g. at conferences and training courses or work-related social events.
- 2.3 The Council recognises that bullying and harassment takes place internally by colleagues and by third parties i.e. contractors, workers, service users, and is committed to alleviate any form of bullying and harassment and will use this policy and procedure to this end.
- 2.4 Matters which are excluded from being dealt with under this procedure are:
 - Matters dealt with under this procedure during the preceding six months.
 - Salary gradings and differentials.
 - Matters connected with an employee's unsatisfactory performance or conduct, where the employee has already been notified of an interview, investigation or formal hearing concerning that matter.
 - Matters which are already covered by a policy or procedure, or which have policy implications for the HR function.
 - Matters over which the employer has no control.
 - Grievances which are the subject of, or appropriate to, a collective dispute between the employer and the trade union.
 - The issues detailed above may be dealt with by Cabinet or Cabinet (Resources) Panel, or be subject to other procedures already in place.

3. Principles

- 3.1 All bullying and harassment is misconduct and is a disciplinary offence which will be dealt with under the Council's disciplinary policy. Bullying or harassment will often be gross misconduct, which can lead to dismissal without notice.
- 3.2 The following principles underpin this policy and outline the expected behaviour from all employees of the Council.
- The Council will not tolerate bullying and harassment from any employee of any kind
 - This includes victimisation of any employee for making allegations of bullying or harassment in good faith or for supporting someone to make such a complaint
 - Victimisation will be treated as a disciplinary offence and will result in disciplinary action
 - Allegations of bullying and harassment will be investigated and, if the grounds of the allegation(s) can be substantiated, disciplinary action will be taken
 - Employees are advised that in serious cases this may lead to civil or criminal action and such action could lead to dismissal
 - Bullying or harassment may constitute unlawful discrimination where it relates to one of the protected characteristics (see glossary).

Malicious or Vexatious Complaints

- 3.3 An employee who makes a bullying or harassment allegation that he/she knows to be untrue, or who gives evidence that he/she knows to be untrue, may be subject to disciplinary action.

4. Procedure

Informal Action

- 4.1 There is an expectation that employees and managers engage and make efforts to resolve a complaint at the lowest level before the complaint is escalated to the formal stages of the procedure. Wherever possible, cases of minor misconduct should be dealt with informally. An informal discussion may help an employee to understand that the effects of his/her behaviour are unwelcome or upsetting and resolve to change it.
- 4.2 The employee raising the concern may feel able to approach the person personally, or with the help of a manager or Human Resources, trade union representative or another employee. Alternatively, an initial approach could be made on behalf of the employee by one of these individuals.

- 4.3 The employee and/or the individual approached should tell the person concerned what behaviour they find offensive and unwelcome, and that it should stop immediately. They should keep a note of the date and what was said and done in case the unacceptable behaviour continues and it becomes necessary to make a formal complaint.

Mediation

- 4.4 It may be appropriate for the matter to be dealt with by way of mediation, depending on the nature of a complaint. This involves the appointment of a third-party mediator, who will discuss the issues raised by a complaint with all of those involved and seek to facilitate a resolution. Mediation will be used only where all parties involved in the grievance agree to this as a means to resolve the issues
- 4.5 If an informal approach does not resolve matters, or the situation is too serious to be dealt with informally, a formal complaint should be made using the Bullying and Harassment (Dignity at Work) procedure.

Formal Action – Stage 1

- 4.6 A formal complaint of Bullying and Harassment can be raised with the line manager, their manager or directly with HR. The bullying and harassment complaint form is attached at Appendix 1. All complaints must be submitted using this form.
- 4.7 The Council will treat complaints of bullying and harassment sensitively and maintain confidentiality to the maximum extent possible. Investigation of allegations will normally require limited disclosure. Information may be disclosed to managers on a “need to know” basis.
- 4.8 If the complaint had been raised but not resolved through the informal process, the formal complaint should include the reason why the outcome was not satisfactory.
- 4.9 All complaints will be investigated promptly without unreasonable delay and, if appropriate, disciplinary proceedings will be brought against the alleged harasser.
- 4.10 The line manager or the officer appointed to investigate the allegation(s) will undertake to commence an investigation into the allegation(s) made. The complaint will be acknowledged within 10 working days of being received. The complainant and the alleged harasser will be informed in writing that the investigation is being undertaken and the likely timescales.
- 4.11 As part of the investigation the line manager or investigating officer will interview the complainant, the alleged harasser and any witnesses to establish the facts.

- 4.12 Records of investigative interviews will be kept and used to assist the line manager to establish the facts and will allow the line manager to decide if there is a case to answer to and if so what action should be taken.
- 4.13 Upon completion of the investigation the line manager or investigating officer will advise management and HR of the findings from the investigation. This will determine if further action will be taken.
- 4.14 If the investigation findings do not support the allegation(s) of misconduct no further action will be taken.

Formal Action- Stage 2

- 4.15 In the event of a finding that the allegation does not constitute misconduct and the complainant feels that their complaint has not been dealt with satisfactorily, the complainant shall have the right of review under this policy. The complainant shall put their reasons in writing within **5 working days** of the outcome from the investigation to the line manager (as appropriate). They should provide justifiable reasons why they believe this to be the case. An appeal/review panel will be arranged within **15 working days** and shall consist of two senior managers, and a HR representative. If after review, alleged misconduct is found to have occurred, the alleged harasser will be subject to disciplinary action. If misconduct is not found, then no further action will be taken.

Taking action under the Disciplinary Policy

- 4.16 If after completion at the investigation stage or as a result of the outcome from the appeal stage 2, the allegation constitutes misconduct the alleged harasser will be advised in writing that they will be subject to disciplinary action.
- 4.17 If it is considered that misconduct has taken place; disciplinary action will be taken in line with the Council's disciplinary policy a disciplinary hearing will be called within **15 working days**.
- 4.18 In cases of gross misconduct the sanction will be dismissal in accordance with the Council's disciplinary procedure.
- 4.19 The right of appeal against any disciplinary sanction issued shall be in accordance with the Council's disciplinary procedure.
- 4.20 The complainant will be kept informed of the general progress of the process of investigation and the outcome of any disciplinary proceedings.
- 4.21 If the complaint is upheld, and the person found to have carried out the bullying or harassment remains in the Council's employment, every effort will be made if it can be accommodated to ensure that, if possible, the complainant does not have to continue to work alongside the harasser.

- 4.22 If the complaint is not upheld, HR will support the complainant, the alleged harasser and line manager(s) in making arrangements to continue or resume working and to help repair working relationships.
- 4.23 Employees have the right not to be victimised for making a complaint in good faith, even if the complaint is not upheld. However, an employee who makes a complaint that he/she knows to be untrue, which is malicious or vexatious, may be subject to disciplinary action.

Right to be Accompanied

- 4.24 All parties will have the right to be accompanied by trade union representative or work colleague at any meeting dealing with the complaint.
- 4.25 Where the employee's trade union representative or work colleague is unavailable on the day scheduled for the hearing it will be rescheduled, provided that the employee proposes an alternative date within **5 working days** of the scheduled date.

Confidentiality

- 4.26 Confidentiality should be maintained throughout the disciplinary process, and all parties involved in the disciplinary process should adhere to this principle.

5. Roles and Responsibilities

Roles and Responsibilities of Employees

- 5.1 All employees have a responsibility to help create and maintain a work environment free of bullying and harassment by:
- Treating colleagues with dignity and respect
 - Being aware of how behaviour may affect others
 - Making it clear that harassment and bullying are unacceptable
 - Making it clear to others when their behaviour is unacceptable
 - Intervening possibly to stop harassment or bullying and giving support to victims
 - Report harassment or bullying to a manager or HR and supporting the organisation in the investigation of complaints
 - If a complaint of harassment or bullying is made, not prejudicing or victimising the complainant or alleged harasser.
 - Not to knowingly make a malicious or vexatious bullying or harassment allegation against another employee (including agency staff), manager or contractor working for the Council.

Roles and Responsibilities of Managers

- 5.2 Managers have a particular responsibility to:

- Treat colleagues with dignity and respect
- Set a good example by their own behaviour
- Ensure that there is a supportive working environment
- Make sure that staff and contractors know what standards of behaviour are expected of them
- Intervene to stop bullying or harassment
- Report promptly to HR any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them
- Investigate and manage complaints in line with this policy

Roles and Responsibilities of HR

5.3 Under this policy, HR will provide operational support to the organisation to enable the effective handling of allegations of bullying and harassment.

HR has a responsibility to:

- Produce and maintain managers guidance notes
- Provide support and guidance to managers and employees throughout the stages of this policy.
- Ensure the communication, maintenance, regular review and updating of this policy
- Monitor and review delivery and impact of this policy.

5.4 Role of Head of HR

In consultation with the recognised Trade Unions, the Head of HR will exercise delegated authority for and be responsible for the ongoing review and updating of this Policy to ensure compliance with changes in statutory requirements and operational delivery, including responsibility for identifying the appropriate process for the regular evaluation of the effectiveness of this policy. Any fundamental changes to this policy will be brought before the Resources Panel for approval.

Role of Trade Unions

5.5 Any review and revisions of this policy will be undertaken by HR and will be in consultation with the Council's recognised trade unions.

6.0 Training and Awareness

6.1 The Council will provide appropriate training and information to employees and others engaged in work within the Council to help them understand their rights and responsibilities under this policy and what they can do to help create a working environment free of bullying and harassment.

6.2 The Council will provide support and development to managers to enable them to deal with complaints of bullying and harassment.

7. Monitoring and Review

7.1 The bullying and harassment policy and procedure will reviewed and updated annually and be available to managers and employees via the HR intranet.

8. Links to Other Policies

- Disciplinary Policy
- Grievance Policy
- Equal Opportunities Policy

9. Equality

9.1 An Equality Analysis has been carried out on this policy and procedure.

9.2 The Council has a duty to monitor the application of the policy in relation to protected characteristics under the Equality Act 2010. This is reported annually in the Council's Equality Monitoring Report.

9.3 If any aspect of the Bullying and Harassment (Dignity at Work) procedure causes you difficulty on account of any disability that you may have, or if you need assistance because English is not your first language, you should raise this issue with HR, who will make appropriate arrangements.

BULLYING AND HARASSMENT (DIGNITY AT WORK) COMPLAINT FORM**EMPLOYEE COMPLAINT**

This form is intended for use by any employee of the Council who wants to make a formal complaint about the behaviour of a colleague, his/her manager or a third party on the grounds that it constitutes bullying or harassment.

Employees should bear in mind before using this form they can request that the matter be dealt with in an informal manner by a manager. Where the employee requests that the complaint be dealt with informally, an appropriate person (as determined by HR) will discuss the matter with the employee, with a view to resolving the matter without recourse to formal procedures.

Where the employee requests that the complaint be dealt with formally, this form should be completed and the Council's bullying and harassment procedure will be invoked. If the complaint is upheld, the Council's Disciplinary procedure will be followed.

This form should be completed and delivered to your immediate line manager. If your line manager is the subject of your allegation(s) you should forward the form to the next most senior line manager. The form should be submitted in an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line. An Investigation Officer will be appointed to investigate the allegations.

Formal Complaint

Employee's Name:	
Employee's Job Title:	
Employee's Department:	
Date:	
Does your complaint relate to your line manager?	Yes/No

Please indicate the basis of your complaint by circling the relevant issue(s)

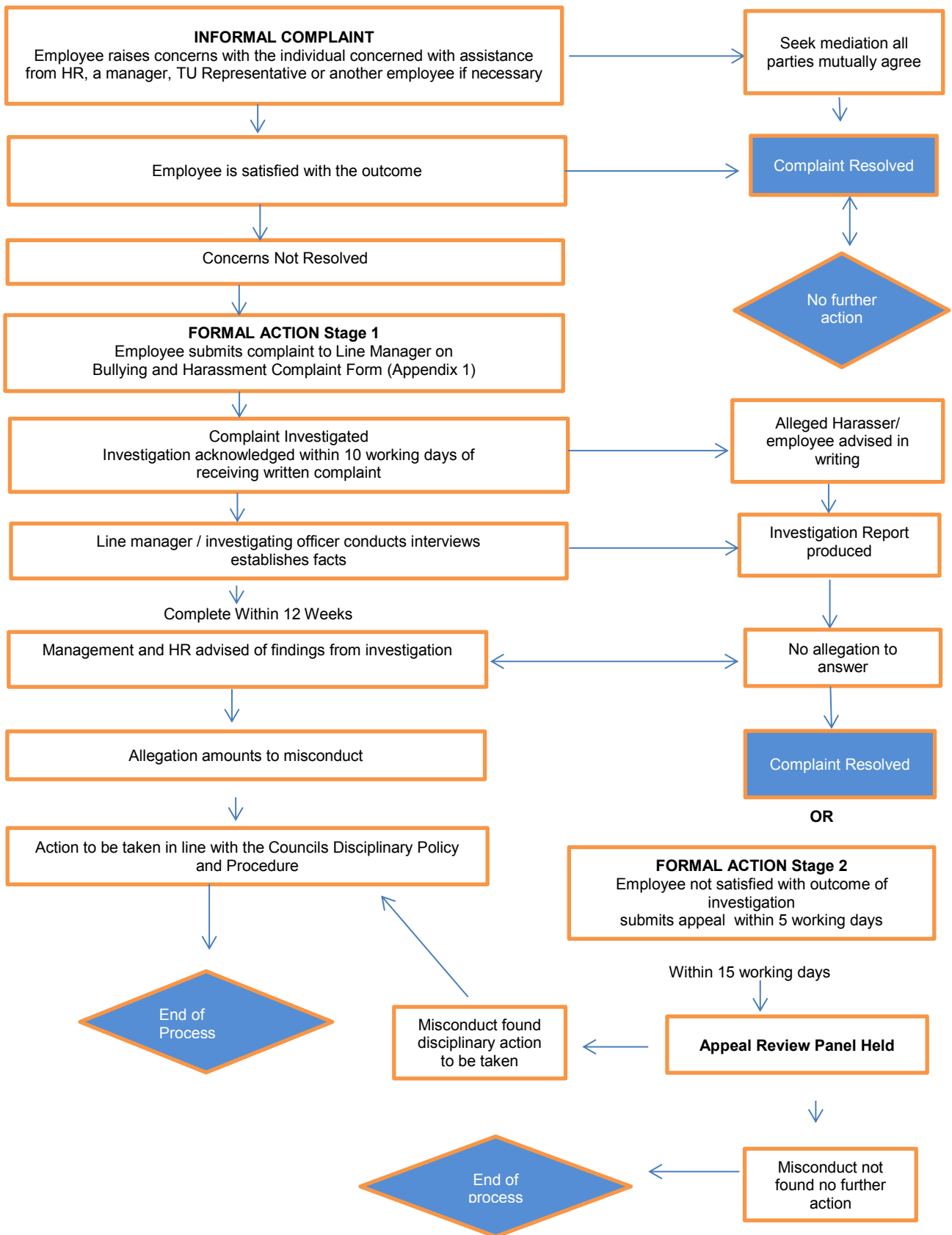
Age / disability / gender reassignment / marriage and civil partnership / pregnancy and maternity / race (which includes colour, nationality and ethnic or national origins) / religion or belief / sex / sexual orientation /other

Summary of Complaint:

Please set out the details of your complaint (providing as much detail as possible, particularly dates, times, locations and the identities of those involved). You may attach additional sheets if required.

Bullying and Harassment Process Chart

Appendix 2



Glossary

Bullying

Is defined by ACAS as “offensive, intimidating, malicious or insulting behaviour an abuse or misuse of power through means intended to undermine, humiliate denigrate or injure the recipient”.

Harassment

Is defined in the Equality Act 2010 as “unwanted conduct related to a relevant protected characteristic which has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or is reasonably considered by that person to have the effect of violating his/her dignity or of creating an Intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the Conduct”.

Harassment Based on Perception

Harassment may also occur where a person engages in unwanted conduct towards another because of perception that the recipient has a protected characteristic (for example, a perception that he/she is gay or disabled), when the recipient does not.

Harassment Based on Association

Similarly, harassment may take place where an individual is bullied or harassed because of another person with whom the individual is connected or associated for example if their child is disabled, or friend is of a particular faith.

Informal Complaint Procedure:

Complaints are best dealt with at an early stage, informally, with the immediate line manager. This gives everyone involved a chance to resolve matters effectively before they escalate.

Mediation

Mediation is a voluntary, confidential process where a neutral person (the mediator) can talk to both sides separately or together. Mediators do not make judgments or determine outcomes - they ask questions that help to uncover underlying problems, assist the parties to understand the issues and help them to clarify the options for resolving their difference or dispute.

Formal Complaint Procedure

It is not always possible to resolve matters on an informal basis, and this is when it becomes important to have a formal procedure for handling complaints. This formal procedure should always be the last resort when other attempts have failed, and not the first option.

The formal procedure requires the employee in question to submit a complaint form to their manager setting out the details of their complaint. They will then be invited to a meeting to discuss the issue.

Review/Appeal

The review/appeal is the final stage of the Bullying & Harassment (Dignity at Work) Policy and Procedure, where the employee has the right to explain why they are dissatisfied with the decision of the previous stage and request re-consideration. To access the appeal stage, the employee must formally make the request in writing, setting out the grounds within the prescribed deadlines.

Investigation Officer

The Investigating Officer is a nominated officer (or in specific circumstances may be an external expert) whose role is to gather all the relevant facts promptly, establish the exact nature of the grievance and the evidence to substantiate or refute this and summarise the findings in an investigation report which will be submitted to the relevant manager.

Third Party Harassment

Harassment also includes circumstances where an individual is subjected to unwanted conduct from a third party, such as a client or customer. If an employee feels that he/she has been bullied or harassed by customers, suppliers, vendors or visitors, he/she should report any such behaviour to their manager who will take appropriate action.

Victimisation

Is subjecting a person to a detriment because he/she has, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing him/her or someone else, or supported someone to make a complaint or given evidence in relation to a complaint.

Protected Characteristics

Bullying or harassment will constitute unlawful discrimination where it relates to one of the protected characteristics. These are defined in the Equality Act 2010 as:-

- Sex and Sexual Orientation

- Race (which includes colour, nationality and ethnic or national origins),
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Religion or Belief
- Age
- Pregnancy and Maternity



Managers' Guidance

Managing Bullying and Harassment issues in the workplace

Version	1.0
Published	February 2013
Review date	February 2014

Managers' Guidance

Managing Bullying and Harassment Issues in the Workplace

The guidance notes have been developed to assist managers when dealing with bullying and harassment issues in the workplace. The guidance is to support the Council's policy and procedure on bullying and harassment and is not intended as a substitute for following policy and procedure.

The guidance is based on best practice, recent developments in employment case law and does not form part of the Council's bullying and harassment policy and procedure.

The information contained within this document is to support the application of the policy and procedure with detailed guidance on the 'how to' that can assist when dealing with bullying and harassment issues, and check lists for managers.

For further information, please contact HR on (01902) 552345 or email HR.supportdesk@wolverhampton.gov.uk

Managers' Guidance

Managing Bullying and Harassment within the Workplace

Contents	Page
1 Introduction	3
2 Definition of Bullying	3
3 Definition of Harassment	3
4 Managers Responsibilities	4
5 Costs to the Organisation	5
6 Signs of Bullying and Harassment	5
7 Informal Resolution	6
8 Mediation	8
9 Managers Check List- Informal Stage	8
10 Formal Process-Stage 1	9
11 Managers Check List- Complaint Meeting	9
12 Working relationships during the investigation	10
13 Principles of conducting an investigation	10
14 Following Investigation	11
15 The review	12
16 Dealing with third party Harassment	13
17 Dealing with Vexatious or Malicious Complaints	14
18 Support	14

1. Introduction

Everyone has the right to be treated with dignity and respect at work. Bullying and harassment of any kind is in no-one's interest and will not be tolerated in the workplace. These guidance notes are based on best practice and give detailed information on managing a complaint of bullying and harassment and are supported by further information where indicated.

2. Definition of Bullying

Bullying is defined by ACAS as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means to undermine, humiliate, denigrate or injure the recipient.

3. Definition of Harassment

Harassment is defined in the Equality Act 2010 as “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual even if this effect was not intended by the person responsible for the conduct”. Protected characteristics are those individual characteristics that are protected by law and are:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation
- Pregnancy and maternity
- Marriage and civil partnership

Whilst most people may agree on extreme cases of bullying and harassment it is the 'grey' areas that cause most problems. These are the subtle behaviours that over time if not confronted may lead to conflict and complaints.

The following are examples of behaviours that could be construed as bullying or harassment:

- Inappropriate behaviours which involve repeated negative behaviours, are unwelcome, are an abuse of power and cause distress, offence or humiliation

- Spreading malicious rumours or insulting someone (particularly on the grounds of protected characteristics)
- Copying memos that are critical about someone to others who do not need to know
- Ridiculing or demeaning someone – picking on them or setting them up to fail
- Exclusion or victimisation
- Unfair treatment
- Overbearing supervision or other misuse of power or position
- Unwelcome sexual advances – touching, standing too close, display of offensive materials
- Making threats or comments about job security without foundation
- Deliberately undermining a competent worker by overloading and constant criticism
- Preventing individual progressing by intentionally blocking promotion or training opportunities
- Unwelcome physical contact
- Posters, graffiti, obscene gestures
- Isolation or non-cooperation and exclusion from social activities
- Automatic supervision methods (i.e. computer recording of downtime from work or recording telephone conversations – where these are not universally applied to all workers)
- Cyber bullying – detrimental texts, images of work colleagues on external websites, detrimental comments on websites

4. Managers' Responsibilities

As a manager it is important that on a day to day basis you:

- Lead by example
- Ensure that there is a working environment free from harassment, discrimination and bullying
- Ensure that staff affected by harassment, bullying or discrimination feel able to raise this with you and that they will be supported
- Advise employees of their responsibilities to ensure that the working environment is free from discrimination, harassment or bullying
- Challenge inappropriate behaviours that may cause offense
- Challenge stereotypical assertions and language
- Challenge harassment and inappropriate behaviour

Sometimes firm management is misconstrued as bullying behaviour. It is not unreasonable for managers to give legitimate, constructive and fair criticism of an employee's performance or behaviour at work. Good managerial behaviours would include the identification of poor performance by looking at all the potential reasons for the performance deficit e.g. people, systems, training, equipment.

As a manager it is important that you treat all employees with the same consideration. If you are not even-handed then it will be difficult to build relationships with staff based on mutual trust and respect and you may be vulnerable to being accused of actions of discrimination regardless of the motivation of your behaviour.

5. Costs to the Organisation

The costs to the council of poorly managed people issues – whether it is workplace conflict, conduct, performance or any other aspect of working life – ranges from the direct and quantifiable to the indirect and more difficult to quantify, both of which contributes to a negative impact on the organisation's culture and morale.

Direct costs may include:

- Time consuming formal proceedings, such as grievances or employment tribunal claims
- Increased costs of sickness absence arising from poor management of employees' complaints and concerns.
- Management time diverted to dealing with people issues rather than managing the business
- Increased staff turnover where employees 'vote with their feet' leading to greater spend on recruitment and training

Indirect costs may include:

- Potentially lower productivity resulting from lower morale leading to less commitment and effort
- Poor working relationships within and between different parts of the organisation
- Reduced focus on corporate goals and objectives
- Reputational damage where culture and morale shifts are picked up by partners and stakeholders

6. Signs of bullying and harassment

Employees are required to treat one another with dignity and respect and maintain professionalism within the workplace, however sometimes conflict occurs within the workplace causing strains on personal relationships which could lead to claims of bullying and harassment.

Not all conflict within the workplace is bad but bullying is different from normal conflict because it involves unfair and unethical behaviours that can cause extreme distress and disruption to the individual and the team.

It is important for managers to watch out for signs of conflict and deal with these early before they become difficulties. You should not ignore tensions that are building within your team and hold regular one-to-ones so that issues can be aired naturally.

As a manager you should respond promptly to any informal or formal complaints, and do not wait to be told if you have already identified a problem. Talk to the victim of the bullying/harassment for their perspective, even if they do not consider it to be a problem. If you think the employee's behaviour is unacceptable, challenge inappropriate behaviour, given the Council's standards you should still raise your concerns with the individual and address the matter.

Managers should be aware that allegations of discrimination, harassment or bullying rarely emerge from a single act, but may be the culmination of many smaller incidents occurring over a period of time, which may not constitute misconduct if considered separately.

7. Informal resolution

It is important that cases are dealt with as early as possible to nip potential issues in the bud. It may be appropriate for the affected employee just to inform the work colleague that their behaviour or language is causing offense.

Dealing with complaints – 2 approaches

An employee complains that her supervisor's behaviour is bullying and that her requests are often unreasonable. When you ask for examples she states that she is often told to do tasks now with little discussion. She states that other staff have noticed this and that the supervisor is not liked because of her demands.

Scenario 1

Before dealing with the complaint you speak to the supervisor. She is upset that her behaviour has been construed as bullying as she is a focused 'task' oriented supervisor who prides herself on her team's results. She had no idea that her requests were causing upset within the team and agrees to try a different approach. You hold weekly meetings with her and through modifications in her behaviour the issue is resolved.

Scenario 2

On receiving the complaint you decide to conduct a formal investigation. You relocate the supervisor to another work area. As part of the investigation the investigating officer needs to interview the whole team. The team are divided and naturally take sides with either the complainant or the accused. Further conflict occurs within the workplace and productivity and motivation decline. The investigation takes 9 weeks after which the supervisor is told that there is not case to answer but must be mindful of her behaviour. She is reinstated into her role and relationships are strained within the team.

The above demonstrates the advantages of dealing with issues informally where possible rather than immediately going into the formal investigation process.

There is an expectation that employees and managers engage and try to resolve issues informally in the first instance if they feel able or they may need support from yourself or HR.

When receiving a complaint from the employee it is important to:

- Remain impartial and objective
- Enquire what is required to move forward
- Separate the person from the problem as making the issue personal could make things worse
- Separate fact from feelings and perception as individuals may be working from prejudice and incorrect perceptions

Dealing with issues informally

This checklist can be used by managers to deal directly with issues informally or to provide guidance to employees on handling the issue themselves.

Talk to the employee concerned

This is appropriate when:

- The relationship is still reasonably positive and when the behaviour is recent
- There is willingness to discuss the issues and work to a win-win solution good indicator of success

Ensure that prior to the discussion you can:

- Identify the behaviours that are being experienced as unpleasant or bullying
- Define the specific incidents in terms of “when”, “what” and “how often”

Structure the discussion so that you cover:

- A clear description of the behaviour that is causing the problems
- The feeling that the behaviour evokes – e.g. ‘when you do this I feel upset’ or ‘I feel hurt’
- The needs of the individual – I need to feel part of the team, be respected
- A request for a simple action – e.g. ‘when we are in meetings I would like you to introduce me’ or ‘when you talk to me I would like you to use my name’

Benefits of talking to the employee directly

- The issue can often be resolved quickly
- Relationships can be improved

As a manager why not....
Rehearse the meeting with the complainant?
Talk about possible responses?
Help the employee to work out a strategy?

8. Mediation

When dealing with complaints of bullying and harassment the best result for the Council may not be to determine who is right or wrong but to make efforts to rebuild the working relationship. This is the most cost effective and productive way to enable conflict to be resolved and often requires the support of a third party; this could be HR or a trained mediator.

Mediation involves a neutral third party who is invited to intervene in workplace situations to deal with a constructive resolution to a specific dispute. Mediation is a voluntary process and is totally confidential. It is not concerned with who is right and wrong in a situation but with resolving the dispute between all parties concerned. Where an employee feels that the nature of their complaint can be resolved through mediation then this should be encouraged.

Mediation can be very effective except where the complaints are of a very serious nature, for example serious complaints of sexual, racial harassment.

Bullying and harassment: a judgement call - Ministry of Justice

“Sometimes certain behaviours can be perceived as discrimination, harassment and bullying, when that is not how they were intended. Mediation can be a good way to help the ‘victim’ see the other person’s perspective and help the other side see how their behaviour is affecting their colleagues. This is a difficult area and it is a judgement call for the mediators to make if it becomes clear during mediation that discrimination, harassment, bullying or poor treatment is going on. They would have to stop the mediation. They would not normally do anything about the misconduct themselves due to the confidentiality agreed before the mediation, but they can advise the parties accordingly.”

To access mediation please contact Human Resources or refer to the Mediation guidance note.

9. Managers Checklist: Informal stage

At the informal stage

- Listen to the employee’s complaint
- Encourage the individual to talk to the work colleague to explain that their behaviour or language is causing offense
- Where the individual is unable to address the concern themselves, offer support and assistance to deal with the issue on their behalf
- Seek to address the issue in a timely way
- Offer mediation where appropriate
- Provide support to all parties
- Discuss the outcome with the employee to ensure resolution
- Seek advice from HR if needed

10. The formal Process- Stage 1

The formal process should be used when the informal process has failed to resolve the issue. If the employees' complaint remains unresolved they should put their complaint in writing using the bullying complaints form to their manager (unless the grievance is about their manager in which case they should raise it with the next most senior level of management).

The employee may feel that the matter has not been resolved because informal discussions with the manager were unable to agree a remedy, or because the manager did not feel that the matter raised was of substance.

On receipt of a complaint you should arrange a meeting with the employee, ideally within 5 working days, in private where there will be no interruptions. You must allow the employee the right to be accompanied at this meeting. Discuss the complaint with the individual and explore the possible outcomes, you will need to discuss the need to investigate with the complainant and give an indication of possible time-scales. During the meeting it may be useful to agree a support programme and dates for future meetings.

11. Managers' Checklist: Complaint Meeting

Preparing for the meeting

- Ensure that the meeting is held somewhere private where there are no interruptions
- Ensure the meeting is arranged promptly
- Consider whether any similar complaints been raised before, how they were resolved, whether there is any pattern to the behaviours complained about
- Consider whether any reasonable adjustments need to be made for the complainant and/or the companion

During the meeting

- Make introductions as necessary
- Invite the employee to re-state their complaint and ask what outcome they are seeking
- Be aware that the employee may have difficulties explaining their complaint and may be upset and emotional during the meeting
- Explain the investigation process and any third parties that may be involved
- Signpost the employee to relevant support e.g. counselling
- Sum up the main points
- Let the employee know an indicative time-scale for any investigation to be completed
- Reassure the employee about confidentiality
- Discuss the issues of working relationships whilst the matter is being investigated

12. Working Relationships during the Investigation

A consideration, depending upon the severity of the accusation will be the working relationship between the complainant and the employee accused of the misconduct. Moving the accused person should not be automatic, but may need to be considered. Discuss the situation and the options with Human Resources.

Some of the issues that you may wish to consider are:

- The nature and severity of the allegation
- The likelihood and the circumstances of both staff having to work together e.g. timescale, supervised or unsupervised; consistency.
- Options available for relocation or redesigning work patterns

Ensure appropriate support is given to all employees affected by the allegation. This includes colleagues as well as the complainant and the accused. This will need to be balanced with the need for confidentiality.

Whilst any investigation is on-going it is important to keep the complainant informed and updated on the progress of the investigation. You may wish to arrange for a weekly meeting to discuss the progress and to support the employee.

13. Key Principles of Conducting an Investigation

As any complaints of bullying and harassment are stressful for both the complainant, the accused, any witnesses and work colleagues you should ensure that the investigation is conducted quickly as possible and in any event within 12 weeks of receiving the formal complaint.

There should be a prompt investigation to find out all the relevant facts before memory fades. Include anything the employee wishes to say. If, in serious cases, there are witnesses, obtain witness statements from them at the earliest opportunity. Make sure the statements are written, dated and signed. Everyone should be clear precisely what the complaint is.

When reviewing the situation the following issues should be considered:

- What the accused is alleged to have done or failed to do
- The circumstances involved
- whether the accused has been counselled about conduct before and whether this has been recorded
- Whether there are any mitigating circumstances

Having considered the above factors and collected relevant information the manager will have to decide whether:

- There is no case to answer and therefore no further action

- Some form of support or management action is needed
- The matter is serious enough for a disciplinary hearing to be arranged.

For further information on conducting investigations please refer to the Conducting and Managing Investigations guidance.

14. Following the Investigation

(a) The complainant

You should meet with the complainant to inform them of the outcome of the investigation and any further actions. The employee will have the right to be accompanied at this meeting by a trade union representative or work colleague.

Where the complaint has been upheld you should inform the employee that this is the case. Inform the employee of the process that the Council are following to deal with the bullying/harassment perpetrator(s) for example dealing with this under the disciplinary procedure, however you cannot inform them of any formal action taken against any perpetrators. You should follow up the outcome of the meeting in writing outlining the main points and outcomes.

Where, following the investigation the complaint is not upheld you will need to discuss the reasons for this with the employee and inform them that they have a right of review (appeal) under the policy. Any review (appeal) should be put in writing to their line manager (or nominated officer) within 5 working days of the outcome of the investigation.

(b) The accused or perpetrator

Where a complaint has been fully investigated and it is found that there is no basis for the complaint then a meeting should be held with the accused employee(s) to inform of the investigation's findings. At this meeting the employee(s) should be given the right to be accompanied.

Where, following investigation it is found that the complaint is not upheld it may be worth considering the use of mediation to rebuild working relationships.

Where a finding of bullying or harassment has been found through the investigation process then, depending on the severity and circumstances of the case the perpetrator will be subject to the Council's disciplinary procedure

15. The Review

If the employee is not satisfied with the outcome from the formal stage 1 meeting they have the right to request a review of the decision. The employee should put their request for a review in writing to the manager (or nominated officer) who conducted the initial grievance meeting.

When doing so the employee should:

- State clearly the grounds for the appeal/review request in writing to the manager who conducted the review hearing
- State why they disagree with the outcome
- Do so within 5 working days after receiving the decision of the outcome

The review should be heard without any undue delay by a senior manager who has not had any prior involvement in the case to ensure impartiality.

The hearing will be arranged by Human Resources and should be held within 15 working days of receiving the written request.

The employee will have the right to be accompanied to the formal meeting and the employee should where possible when confirming their attendance to an appeal hearing, advise HR if they will be accompanied.

The review (appeal) panel will consider the investigation officer's report and the reasons for why the complainant feels that the complaint hasn't been dealt with satisfactorily.

At this review it is important to consider:

- Whether the investigation report considered all of the salient facts
- Whether further evidence changes the outcome of the investigation
- The reasons for the employee asking for the review and any information that they may have that they feel hasn't been satisfactorily investigated

The senior manager hearing the review/appeal should again allow the employee to clearly state their grievance and why they feel that the decision of the panel at the stage one meeting was wrong. The panel will consider if the outcome of the stage one grievance meeting was appropriate or not and will consider the investigation officer's report and the reasons why the complainant feels that the complaint has not been upheld.

At this hearing the panel will consider whether:

- The investigation report considered all of the salient facts
- Further evidence changes the outcome of the investigation

The senior manager hearing the case must concentrate on the substance of the case and seek to clarify the facts and the employee should be given the opportunity to put their case forward.

The manager should advise the employee that they will receive the outcome in writing within 5 working days of the hearing.

16. Dealing with Third Party Harassment

An employee may come to you complaining of harassment by a 'third party' i.e. somebody who is not directly employed by Wolverhampton City Council and could be a worker (i.e. agency employee), a contractor, a service user or any other person that the employee comes into contact as part of their duties. Where a complaint is made then you should take all reasonable steps to ensure that this harassment does not continue.

This will include:

- Talking to any agency responsible for a worker
- Talking to any contractors and making them aware of the complaint
- Carrying out a risk assessment of the likelihood of the harassment occurring again
- Minimising contact with the third person and the employee

Employers are only liable for third party harassment when they are aware that it has taken place and that it has occurred on at least two separate occasions and have not taken reasonable steps to prevent it from happening again. Where an employee complains of third party harassment then you should speak to your HR advisor for additional support.

17. Dealing with Vexatious or Malicious Complaints

It is very difficult to establish whether a complaint is vexatious or malicious. Most complaints are made in good faith and where, once fully investigated they are not founded it is important to consider the motives of the complainant. As complaints are based on an individual's perception of a situation it is not always appropriate to assume that an unfounded complaint is vexatious or malicious.

Where a complaint has been investigated and as part of the investigation process it has become clear that the complainant has knowingly and deliberately set out to deceive then this should be investigated as a potential vexatious or malicious complaint. The investigation should follow the investigation guidelines under the disciplinary procedure and where founded then actions under this procedure will apply.

18. Support

Managers can access support from Human Resources who will be able to offer further advice and guidance on the process - contact HR.supportdesk@wolverhampton.gov.uk or telephone (55) 2345.

Learning and development tools are available via the Council's e-learning zone at <http://wolverhampton.learningpool.com/>

Whistleblowing Policy and Procedure

Policy statement

Every employer faces the risk that something will go badly wrong in their organisation and ought to welcome the opportunity to address it as early as possible. Whenever such a situation arises the first people to know of such a risk will usually be employees yet while these are the people best placed to speak up before damage is done, they often fear they have the most to lose if they do (otherwise known as “whistleblowing”). They may also feel that speaking up would be disloyal to their colleagues or to the Council and they may fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The Council is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we actively encourage employees, and others that we deal with, who have serious concerns about any aspect of the Council’s work to come forward and voice those concerns.

This document makes it clear that you can raise concerns without fear of victimisation, subsequent discrimination or disadvantage. This whistleblowing policy and procedure is intended to encourage and enable employees to raise serious concerns within the Council rather than overlooking a problem.

Whistleblowing is the popular term used when someone who works in an organisation raises a concern that could threaten customers, colleagues, the public or the organisation’s own reputation. As an early warning system, whistleblowing can help alert employers to risks such as:

- a danger in the workplace;
- fraud in, or by the organisation;
- offering, taking or soliciting bribes;
- damage to the environment;
- failure to comply with appropriate professional standards;
- gross waste or mismanagement of funds;
- serious misuse or abuse of authority;
- misreporting performance data; or
- neglect of people in care.

Whistleblowing concerns as distinct from grievances

Whistleblowing is where an employee has a concern about danger or illegality that has a public interest aspect to 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. Therefore, any issues surrounding an employees’ own contracts of employment, bullying or harassment, should be raised under the existing Council policies for these issues (copies of which can be obtained on the Council’s intranet site). Where issues involve potential cases of fraud, bribery or corruption, employees should also refer to the Council’s anti-fraud and corruption policy and procedure.

Aims of this policy and procedure

The aims of the whistleblowing policy and procedure are as follows:

- To encourage employees to feel confident about raising concerns and to question and act on those concerns.
- To provide ways for employees to receive feedback where appropriate on any action taken as a result.
- To reassure employees that if they raise concerns in the public interest and reasonably believe them to be true (*known as a public interest disclosure), the Council will not tolerate any reprisal against an employee because they have raised a concern under the policy, and will treat any such reprisal as a disciplinary matter which might lead to dismissal. However, this assurance is not extended to those who maliciously raise a concern that they know is false, which is also considered a disciplinary matter.
- To ensure that employees are aware of the options available to them if they are dissatisfied with the Council's response.

* No agreement made before, during or after employment, between an employee and the Council will preclude that employee from making a public interest disclosure.

Who is covered by the policy and procedure?

The Council's whistleblowing policy and procedure applies equally to employees, Councillors, job applicants, volunteers, agency workers and Council contractors, suppliers and partners.

Raising a concern

While it is hoped this policy and procedure will reassure employees to raise concerns internally, the Council accepts that employees can safely contact an appropriate external body. Therefore, you may wish to, or benefit from, talking the matter through in confidence with such an external body. If so, independent and confidential advice is available through the organisation Public Concern at Work, who can be contacted as follows:

Public Concern at Work

3rd Floor
Bank Chambers
6 -10 Borough High Street
London
SE1 9QQ
(Tel: 020 7404 6609)
(www.pcaw.org.uk)



Public Concern at Work is a whistleblowing charity that aims to protect society by encouraging workplace whistleblowing. They operate a free, confidential advice line for workers with whistleblowing dilemmas.

If you decide to go ahead with raising a whistleblowing concern, the Council hopes that you will feel able to raise it with your line manager. Where you do not feel that is an option or a sensible course (for example because the issue may involve your manager), or if the concern has been raised locally but remains unaddressed, the concern can be safely raised at a higher level by using the Council's confidential whistleblowing hotline:



Whistleblowing hotline: (01902) 550550

(24 hours a day, 7 days a week, answerphone out of office hours)

Alternately, concerns can be raised directly with the following officers:

Peter Farrow - Head of Audit Services

Tel: (01902) 554460

e-mail: peter.farrow@wolverhampton.gov.uk

Kevin O’Keefe – Director of Governance/Monitoring Officer

Tel: (01902) 554910

e-mail: kevin.o’keefe@wolverhampton.gov.uk

This policy and procedure is intended to provide you with an avenue within the Council to raise concerns. The Council hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the Council, the following may be useful contact points:

Public Concern at Work (contact details above)

The Council’s external auditors:

PricewaterhouseCoopers (PwC)

Cornwall Court

19 Cornwall Street

Birmingham

B3 2DT

(Tel: 0121 265 5000)

Whilst anonymous allegations will be assessed and action taken where appropriate, it is much more difficult to properly investigate matters raised anonymously. The whistleblowing policy and procedure is designed to protect anyone raising concerns and individuals utilising the provisions of the policy are encouraged to identify themselves. Obviously, feedback relating to any investigation which has been undertaken can only be provided where contact details are known.

How will the Council respond?

Where a concern is raised, whether formally under the policy or not, the manager will listen carefully, avoid pre-judging the issue and decide whether it should be dealt with under the whistleblowing policy.

Some concerns may be more suitable to be investigated and dealt with by managers through alternative Council procedures such as the disciplinary or grievance processes. Also, concerns or allegations which fall within the scope of other specific procedures (for example, child protection issues) will normally be referred for consideration under those procedures.

Where it is decided that it is a whistleblowing concern, and in all cases where a concern is raised formally (by invoking the policy), the manager should notify the head of audit services. A decision will then be taken between both parties, as to the most appropriate way, dependent upon how serious and urgent the risk is, in which way the concern can be investigated, for example an audit services investigation, other internal investigation, referral to the police or other external organisation.

You will be told how and by whom your concern will be handled, and be given an estimate of how long any investigation will take.

If you would like an update or feedback following the raising of your concern, you will be told, where appropriate the outcome of the investigation. However, due to the legal obligations of confidentiality the Council owes other employees, it might not be able to freely provide feedback on the outcome of any disciplinary action taken against another employee.

The Council will respect confidentiality and your identity will be kept confidential if you request, unless disclosure is required by law. However, the Council cannot guarantee that others may not try to deduce (correctly or otherwise) your identity. If you are wrongly identified as having raised a concern, the protection offered to whistleblowers within the policy, will also apply to you.

Reporting

The Head of Audit Services will maintain a record of all key details of concerns raised under the whistleblowing policy and procedure and will report on whistleblowing concerns and their outcomes, as necessary to the Audit (Monitoring of Audit Investigations) Sub-Committee in accordance with the principles on confidentiality.

In the event that a member of the Audit Sub-Committee is dissatisfied with any aspect of how the concern has been dealt with, the matter will be referred back to the main Audit Committee or the Council's external auditors.

An annual report summarising activity undertaken under the Council's whistleblowing policy and procedure will also be submitted to the Audit Committee. This report will include:

- a record of the number and types of concerns raised and the outcomes of investigations;
- feedback from individuals who have used the arrangements;
- any complaints of victimisation;
- any complaints of failures to maintain confidentiality;
- a review of other existing reporting mechanisms, such as fraud, incident reporting or health and safety;
- a review of other adverse incidents that could have been identified by staff (e.g. complaints, publicity or wrongdoing identified by third parties);
- a review of any relevant litigation; and
- a review of staff awareness, trust and confidence in the arrangements.

Review of the whistleblowing policy and procedure

The Council's whistleblowing policy and procedure will be reviewed on an annual basis by the Head of Audit Services and the Audit Committee to ensure that it remains up to date, fit for purpose and represents generally accepted good practice.

[NOT PROTECTIVELY MARKED]

Please provide any and all existing policies, procedure guidelines and best practice guidelines on the Council's bullying and harassment policies as it relates to civic centre visitors.

In respect of your above question, it has been established after careful consideration that the Council does not hold the above information in the category requested.

Consequently, we are unable to provide the information relating to the above, and are informing you as required by Section 1(1) (a) of the Act, that states:

"Any person making a request for information to a public authority is entitled to be informed in writing by the public authority whether it holds information of the description specified in the request".

However, I can advise you the information we do hold is as follows:

Complaints Procedure

City of Wolverhampton Council is a Customer First organisation. We believe that the needs of our residents are our top priority and we are committed to putting our customers first by improving the quality of our services and our customers' experience of them.

City of Wolverhampton Council wants to encourage all customers to be involved in the decisions that we make and in the development of our services. We welcome our customers' views. One of the ways in which we acquire comments and opinions in order to influence service planning and delivery is through customer comments, compliments and complaints.

This policy sets out how City of Wolverhampton Council manages and responds to comments, compliments and complaints.

Comments

If you want to make a comment about anything that the council does or if you would like to make a suggestion on how we could improve the services that we provide, we would welcome your thoughts.

Compliments

If you receive a particularly good service and wish to make a compliment, we will ensure that the person or service is made aware of your comments.

Complaints

A complaint is an expression of dissatisfaction about the council's action or lack of action or about the standard of a service, whether the action was taken or service provided by the council itself or a person or body acting on behalf of the council.

You don't need to make a complaint if you want to report:

- Litter
- Potholes
- Missed bin collection
- Abandoned vehicles
- Graffiti etc.

You can simply call us, email us or complete an online e-form. If you are dissatisfied with the action that we take in response to your enquiries then we need to know.

Exceptions

In some cases we may not be able to deal with your complaint directly, this may be because they are covered by different procedures. The types of areas that we won't deal with through our complaints procedure include:

- Staff/ex-staff complaints about employment matters including grievances or disciplinary hearings
- Penalty Charge Notice appeals
- Benefit appeals about decisions or the rate of payment
- School admission appeals
- Cases where legal action has already started
- Cases covered by our insurance procedures
- Complaints about councillors
- Council tax banding decisions
- Complaints that are being investigated under statutory procedures for children, families and vulnerable adults
- Where the complaint has already been dealt with in another way, for example, by the courts or Ombudsman.

The council will always offer advice and assistance to customers wishing to make a complaint. If it is not appropriate to treat an issue under the corporate complaints procedure, as described above, we will refer you to the appropriate procedure or we will advise you on how to make your complaint elsewhere.

1. How to make a complaint

If you are not happy with a service you have received from us or the way you have been treated, we want you to tell us so that we can, where possible find a satisfactory resolution.

There are a number of ways you can make a complaint to us:

- Phone City Direct on 01902 551155
- Complete the council's complaints form
- Complete the council's complaints e-form (www.wolverhampton.gov.uk/complaints)
- Email us at customerfeedback@wolverhampton.gov.uk
- In person at the Civic Centre
- Write to our Complaints Manager, City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RL
- Ask a friend, a relative, advocate or anyone to contact us your behalf

Make sure you give us as much information as possible. Let us know what you think has gone wrong and how you think we can correct it.

2. Complaints process

There are two stages to the council's complaints process. We aim to resolve all our complaints at stage 1.

If we have made a mistake, there are several ways we can try to put it right. This includes:

- Make an apology
- Give a full explanation
- Review a decision we have already made
- Review our procedures
- Consider and advise on financial compensation

We will consider each case on its own merits and offer the most suitable remedy.

What will happen with your complaint?

Stage 1

We will acknowledge your complaint within 4 calendar days. Your complaint will be allocated to a senior manager from the service area complained about. An investigation will take place and you will be provided with a response within 21 calendar days. If we need more time to investigate your complaint we will let you know.

Stage 2

If you are dissatisfied with the outcome of your Stage 1 complaint, please contact us as quickly as possible. We will acknowledge your complaint within 4 calendar days. Your complaint will be investigated by the Complaints Manager. When the investigation is complete a report will be prepared for the Managing Director and the Director of the Service for comment. If we need more time to investigate your complaint we will let you know.

A full response will be sent to you within 28 calendar days and you will be advised of what to do next if you wish to pursue your complaint.

The Local Government Ombudsman

Stage 2 is the final stage of the council's complaints procedure. If you remain dissatisfied with the outcome your complaint, you can contact the Local Government Ombudsman at:

Local Government Ombudsman, PO Box 4771, Coventry, CV4 0EH

Tel: 0300 061 0614

Website: www.lgo.org.uk

3. Complaints monitoring

Performance by areas of service is monitored on a monthly basis with reports produced for management as required

Performance figures will be published on the council's website:
www.wolverhampton.gov.uk/complaints

The Complaints Manager will produce an annual report for City of Wolverhampton Council providing an overview of the complaints that have been received and overall performance. This report will be published on the council's website

4. Policy on the management of unreasonable complainant behaviour

This policy sets out how we will decide which complaints will be treated as unreasonable or unreasonably persistent, and what we will do in those circumstances. The policy is for the information of staff, staff in City of Wolverhampton Council's partner organisations and councillors as well as customers. A copy of this policy is available on the council's website: www.wolverhampton.gov.uk/complaints

[NOT PROTECTIVELY MARKED]

Please provide any and all existing policies, procedure guidelines and best practice guidelines on the Council's Potential Violent Persons register policies as it relates to staff.

Please provide any and all existing policies, procedure guidelines and best practice guidelines on the Council's Potential Violent Persons register policies as it relates to civic centre visitors.

With reference to your two questions above, I am writing to inform you that the Council has decided not to disclose this information as it falls under the exemption(s) in Section 22 of the Freedom of Information Act 2000, which relates to Information Intended for Future Publication.

The above documents are currently under review, which should have an outcome by the end of this month.