

BBC progress report in response to the Dame Janet Smith Review

**July 2016** 



#### **Foreword**

When Dame Janet Smith published her Review of the cultures and practices in the BBC during the Jimmy Savile and Stuart Hall years I, like everyone else, was shocked and saddened by what she found.

I said then that what happened was profoundly wrong and could never be excused. That we owe a vast debt of thanks to those survivors who came forward and allowed their stories to come to light. And that we owe it to them to do everything possible to make sure that nothing like it ever happens again.

That was our over-riding focus in responding to and addressing the findings of the Review. And that feeling remains just as strong – if not stronger – today.

Since the publication of the report, we have been taking a hard look at what we do, how we do it and how it could be done better. Whilst our work to address Dame Janet's findings will be a process that continues, we still have much to report and I'm pleased that we are publishing this update on where we are today.

I think the detail in this report shows that we have made significant progress since 2012. Our child protection, complaints, whistleblowing and investigations processes are all sound – and we are doing even more to make sure all our staff are aware of them.

But of course we can always make further improvements.

The BBC has to be sure it is doing everything we can and that's why, over the coming months, we will build on what we have already done to simplify all our policies and to make sure they are accessible and succinct. We will further consult with staff over the summer to understand the kind of culture and behaviours we all want to see at the BBC – then we will put this into practice.

We will continue to work with partners – such as NAPAC and the NSPCC – to further develop and improve our child protection and staff support arrangements. And we will open ourselves up to further external scrutiny and review – this is why we are asking GoodCorporation to undertake a further independent and objective audit of what we do. That audit will report later in the autumn and we are committed to making any changes that it recommends.

Our final response to Dame Janet's Review will be published later in the year, but that will not be the end of the process – lessons will continue to be learned, processes improved and protections strengthened. That is the only way we truly can ensure we rebuild the trust and faith of those who we failed.

Tony Hall

**Director-General** 

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# BBC progress report in response to the Dame Janet Smith Review July 2016

## **Background**

In February 2016 Dame Janet Smith published her Review of the cultures and practices in the BBC during the years that Jimmy Savile and Stuart Hall worked here. The report made sobering reading for the BBC and set out in detail the unacceptable circumstances that led to so many abuses being carried out on BBC premises. It was only because of the courage of the survivors who came forward to tell their stories that these events came fully to light. The BBC owes them a debt of thanks and recognises that it must do all it can to ensure that what they encountered can never happen again.

Dame Janet's report made a number of very clear findings about failings in the BBC during the relevant time and about things that could have been done better. However, given the passage of time and the prevalence of many of those failings in society more widely in that era, Dame Janet chose to make one overarching recommendation – that the BBC should:

demonstrate to the public that it has taken the current criticisms seriously and has made, or is making, such changes as are necessary and appropriate to ensure that these terrible events cannot occur again... within, say, six months of this report, the BBC should set out its official response to all the reports<sup>1</sup> and should explain what its current rules, policies and procedures are in respect of each of the areas which have been open to criticism and demonstrate that these apply current best practice.

For the avoidance of doubt, the issues which should be dealt with in this way include the protection of children and young people, complaints and whistleblowing procedures and the procedures for investigating complaints whether internal or external. Examining these issues will also entail close examination of the operation of the Human Resources function. In addition, a commitment from the very top of the organisation to the principles of good practice in all these areas must be demonstrated.

It was also suggested the BBC should commission an external audit of these policies and procedures, setting out the scope of the review, the timetable for completion and agreeing to accept any recommendations for improvement made as a result of that work.

Responding to the report, the BBC committed to undertake, in full, the steps proposed by Dame Janet. The Director-General said that:

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<sup>&</sup>lt;sup>1</sup> Respect At Work Report May 2013, GoodCorporation Review of the BBC Whistle Blowing and Child Protection Policies and Processes July 2015, The Dame Janet Smith Review Report February 2016



We will, as Dame Janet recommends, review all our policies and procedures in light of her report... I am committed – we are all committed – to creating a more open BBC where everyone has the confidence to raise issues and believe that something will be done about them.

We promised to publish our progress alongside the 2015/16 Annual Report and, as such, this report sets out what has been achieved to date – what we have in place already, what we intend to do, and what additional scrutiny we will open ourselves to in the coming months. The BBC's final response to Dame Janet's Review will be published later in the year, following an external review and audit of our efforts to date. This will be conducted by GoodCorporation over the coming months. We set out below the timetable for this review, and what it will cover.

## Our current rules, policies and procedures

Dame Janet's report highlighted three particular areas that the BBC should give further attention to and review – the protection of children and young people, complaints and whistleblowing processes and the procedures for investigating complaints. At the time of publication, the Director-General made clear that, in each of these areas, we haven't been standing still. Much has been done in the past few years to embed best practice in what we do, and this work has been subject to significant internal and external scrutiny: through the work undertaken by Dame Janet Smith and Dame Linda Dobbs; Dinah Rose QC's Respect at Work review; as well as by GoodCorporation.

This section sets out more detail on where we are now – and what we intend to build on – in each of the areas specified by Dame Janet. Information on all our policies and practices will be published in our final response, following a further external audit.

#### **Child Safeguarding**

Across the BBC there are over 40 Child Protection Advisers who act as a point of contact for all staff. Their role is to act as a safeguarding champion within their division and to provide advice and guidance to staff regarding working with children, as well as to act as a conduit for safeguarding concerns and referrals to the Head of Child Protection and Safeguarding. They are fully trained and supported in their role and they meet on a quarterly basis to discuss policy and practice changes, risks identified, case management and other issues.

Our Child Protection Advisers attend an annual training day facilitated by the Head of Child Protection and to which external speakers are invited. We have also run four training days attended by Child Protection Advisers, BBC Investigations and HR staff, looking at how we identify and manage allegations made against people working with children.



A Child Protection Steering group is responsible for overseeing and receiving reports on all aspects of child protection across the BBC, to ensure that safeguarding remains a priority. The remit of the group includes oversight of policy and practice, quality assurance, monitoring and compliance. It meets quarterly and is currently chaired by the Director HR. Its members are senior managers across the organisation including World Service, Global News and BBC Worldwide.

The BBC's current Child Protection Policy has been in place since September 2013. Since that time it has been revised to take account of changes in legislation, best practice and to reflect learning. The latest revision was in April 2016. Alongside the Child Protection policy the BBC has a Child Protection code of conduct which everyone working with children is required to adhere to and which was revised and re-launched in June this year.

All our policies and guidance which support best practice for working with children are kept under regular review and are available internally on the BBC's 'Working with Children' web site. The Child Protection policy, code of conduct and a Child Protection checklist are also available on our website<sup>2</sup>.

There are two levels of safeguarding training available to all staff.

- An online course, 'Working with Children', is mandatory for all staff who will be working with children. This course has a validity period of three years. Some 4,500 people have received this training in the past two years.
- A face to face course on working with children is mandatory for all staff working within BBC Children's as well as for anyone who will be coming into contact with children in other areas of the BBC. Run monthly in Salford and London, this course has a validity period of three years.

We have updated this mandatory face to face and online safeguarding training and made the online training available to independent production companies when they are commissioned to make programmes on behalf of the BBC. Through the training we actively reinforce that any concern for a child must be shared with the Child Protection Adviser, that concerns will be listened and responded to and that there will be no personal detriment to the individual making the report.

We have also made changes to the way we engage Supporting Artists. From January 2016 it became a requirement that no Supporting Artist could work on a BBC production involving

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<sup>&</sup>lt;sup>2</sup> See the relevant documents at:

http://www.bbc.co.uk/aboutthebbc/insidethebbc/howwework/policiesandguidelines/child protection.html



children at any time without having been subject to a Basic Check from Disclosure Scotland showing that they had no specific unspent convictions.

We also have in place a clear and comprehensive child protection referrals system, ensuring that welfare concerns for children that are identified by BBC staff or members of the public are handled consistently and appropriately. These referrals can arise for a range of reasons – from children attending our shows, to entering competitions, taking part in events or writing on message boards – and they can relate to all forms of abuse, including online. These concerns will be responded to by the Child Protection Team and appropriate action taken within 24 hours. This means that we will have shared our concerns with a statutory agency such as Social Services, the police or the NSPCC and may also, dependent upon the degree and nature of the concern, have made contact with the child's school to share information.

## Complaints and whistleblowing procedures

Raising concerns

Across the BBC, we have a wide variety of means by which complaints can be raised, both internally and externally<sup>3</sup>.

For our staff, the BBC has a range of ways in which employees can find support, advice or raise a concern, either informally or formally. Staff can always raise an issue with their line management or union representative, and we also have a dedicated HR Service Centre available to offer assistance on any concerns. However, as well as these informal routes, we also offer a range of other options.

- A mediation service, with some 30 trained staff volunteers from all across the BBC, to resolve issues.
- A dedicated Support at Work team in our HR function professionally handle all formal claims of bullying and harassment through to resolution.
- An independent 24/7, confidential and dedicated help line for all our staff, whether employees or freelancers. This offers confidential and practical advice and information to anyone experiencing bullying, harassment, or who has a concern about behaviour at work. Individual calls are not reported to or shared with BBC management or HR.
- An Employee Assistance Programme, provided by an external provider, which offers free, independent and confidential information, advice, counselling or legal assistance on a wide range of work, family and personal issues.
- Our dedicated whistleblowing channels (for more information, see below).

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<sup>&</sup>lt;sup>3</sup> Members of the public can raise complaints through a variety of routes. Further information about raising a complaint externally can be found at: <a href="http://www.bbc.co.uk/bbctrust/contact\_us/making\_a\_complaint.html">http://www.bbc.co.uk/bbctrust/contact\_us/making\_a\_complaint.html</a>



The HR department regularly reviews and evaluates its processes to ensure they are in line with business needs and best practice. More recently we have transformed the way that HR works for our people and created a new model which simplifies the way in which our people engage with our HR services.

As part of this, we have standardised our online channel, Gateway, making it easier for all employees to access information and guidance on how to resolve employment issues. Through our new HR Service Centre, both employees and team managers are provided with advisory services, aiming to resolve queries on first contact, and manage escalations where this cannot be achieved 'first time'.

We created a specialist 'Manager Advice' service to coach and advise managers seeking help and support on handling certain employee issues. We now use a sophisticated case management tool to signal trends in behaviour, enabling us to manage more proactively. In addition, specialist HR teams have been created to support in resolving specific issues, including Employee Relations and Support at Work.

#### Whistleblowing

Despite all these changes, however, we recognise that some complaints or issues cannot be raised through the formal channels outlined above.

Because of this, we have put in place an improved whistleblowing policy that provides both staff and members of the public with a number of routes to raise concerns confidentially. We have an external, anonymous and confidential service that can help with any concerns about malpractice at work through a dedicated hotline or via an external email link. People may also go directly to the Director of Risk and Assurance or the Senior Independent Director, Dame Fiona Reynolds.

Last year, 31 cases were received through one of our channels and treated as whistleblowing – more detail on these, and how they were handled, is in the annex to this report.

#### Investigating complaints

Since 2012, our policies on grievances – including bullying and harassment issues in particular and the way these are handled – have been revised in the light of feedback we received from previous external investigations and audits.

We now have a small, dedicated team of cases managers within HR who deal with bullying and harassment cases. We have also contracted with an external firm to provide an



independent view at case hearings and to date there has been agreement over the case outcomes determined by the hearing managers. Case hearings themselves are heard by a trained senior manager from outside of the complainant's business area, so as to ensure impartiality.

Some 41 formal grievances relating to bullying, harassment or sexual harassment were dealt with by our Support at Work team in the 12 months to March 2016. The average time to investigate and close a case was 58 working days, down from 83 days on average in 2014/15.

Additionally there have been 11 disciplinary cases (5 bullying and harassment cases and 6 sexual harassment cases), of which 9 were related to grievances raised and 2 were unrelated to grievances. The table annexed to this report lists the volume of cases we have received in the 12 months to end March 2016, together with the outcome.

We are not aware of any other similar organisations that freely publish such data and are therefore unable to comment on the BBC's relative performance in this area. The publication of these statistics is part of our commitment to being as open as possible and provides evidence that we are carefully monitoring – and dealing with – these kinds of cases. We remain committed to ensuring that we have appropriate and well-publicised routes available to all our staff to raise issues.

Our confidential independent helpline provider, Care First, tells us that the majority of the calls they receive concern the use of inappropriate language and, after being given advice about how to raise this with the perpetrator, the issue is resolved. Very often the individual had not been aware that they had caused offence.

Wherever possible, of course, we seek to resolve issues amicably and informally and, over the past year, 23 cases were referred to our internal mediation service.

In addition to the handling of bullying and harassment cases, the BBC also has a dedicated, internal investigative capability, which is now part of the Corporate Security and Investigations team. The investigators in the team manage a caseload ranging across issues from personnel security to theft and fraud. The team is a key interface between the BBC and the civil police authorities. It is also an integral part of the BBC complaints process, works closely with the Child Protection network and supports the whistleblowing policy and associated procedures.

All allegations are recorded on a central database, maintained by our Investigations department, and are investigated either directly by Investigations or by relevant line/HR management.



The results of these investigations can include:

- referral to the police or other authorities;
- formal disciplinary processes with outcomes ranging from dismissal to warnings;
- recommendations for improvements in policies and processes including communications and training activities. These will generally involve speaking to the individuals subject to the allegations and making them aware of any changes needed in their actions or behaviour; or
- concluding that no evidence was provided or found to substantiate the allegations.

## Building on what we do

Since publication of the Dame Janet Smith Review, we have continued to take forward a large programme of work, both across the areas highlighted by the Review and also in those areas where we said we wanted to do more – including as a programme maker and on developing our culture. Much of this builds on the work we undertook in response to the Respect at Work review and the findings of the GoodCorporation. We will publish more detail on all our work in the autumn, in the meantime the information below gives a sense of what we have been doing, and what is yet to do.

#### Raising awareness

By putting all the processes set out above in place, we aim to make it easy for people to raise a concern and to create an environment where they feel confident in speaking up if they have concerns about any issues of potential malpractice, including the way they are treated. We measure this in our annual survey – which covers both employees and freelancers – to get their views on how the BBC is performing and what it could do better. Our most recent survey closed in November 2015. 93% of our staff said they were proud to work for the BBC and 95% believe they demonstrate the BBC's values in their work.

This is encouraging but, whilst 72% said they knew where to go to find information and support if they experienced or saw bullying or harassment, only 49% said they would be confident that relevant policies and procedures would be applied fairly and effectively, and 47% would be confident in action having a fair outcome. Furthermore only 55% of respondents knew of the BBC Whistleblowing policy.

Dame Janet specifically commented on the fact that awareness of the BBC's whistleblowing policies and processes was comparatively low, outside of senior levels. We want to improve on these responses very significantly.

We followed up the staff survey with focus groups to better understand issues and develop localised action plans. In June we launched the first of what will be a regular and wide-



ranging awareness campaign across the BBC, encouraging everyone to be able to "speak up". This highlights not just our whistleblowing channels, but all of the ways that staff can raise concerns and seek resolution. Some examples of this campaign are shown below – we are rolling this out across the BBC.





To raise awareness of bullying and harassment as an issue and to educate people on what form this can take we have also produced an online training module on the subject, and this is being woven into our new manager training programmes. We have revitalised our training for new managers, which was piloted in May and June, to raise awareness. Part of our ongoing work includes activities to define and establish a better understanding of what we believe good management and good behaviour should look like at the BBC.

## Review of policies

When Dame Janet's report was published we said that we would begin by reviewing our policies and procedures and their operation. Anne Bulford, Deputy Director-General, has led this work, which has looked across all our systems to:

- assess how easy it is for staff to raise issues in practice;
- look at the operation of our systems; and
- benchmark what we do against both the experiences of and the approaches deployed by other large organisations.

With external professional help to supplement our internal teams we have looked at how the policies are deployed in practice. In doing so we have also met with a number of UK



organisations to compare and contrast how the BBC operates. These included companies who were previously in the public sector, companies with diverse business operations, some whose workforce was geographically spread, remote from offices or who had limited access to traditional communication routes such as intranets. Employee size varied from 20,000 through to global businesses of 100,000+ employees. We have looked at policies, processes, communication, accessibility, volumes of cases and accountabilities.

From the findings of this internal review, we are confident that our policies and practices are fundamentally sound and the actions from the previous Respect at Work and GoodCorporation reviews have been implemented.

However this work has also identified that there are some areas where we can do better and action has been taken quickly to strengthen these. For example, when new people join us we need to do more to ensure they are fully aware of the range of help lines and the importance of being able to raise concerns – this is now being implemented in our staff induction training. However, the number of different ways in which people can raise issues or concerns is very comprehensive, to the point where it could be confusing for people and so we will also be streamlining this.

In addition, having looked at other companies' practices, we believe we can improve significantly on how we make our policies come alive for our people in a more meaningful way and form a fundamental part of how we do things at the BBC. This is not about changing the substance of the policies themselves, but rather to change the way they are communicated. We must ensure that the good intent of our policies is not masked in too many, overly complex documents.

So, over the next few months, we will be addressing this, making all our policies simple, plain speaking, and easily accessible. They need to be presented as an integral part of how our people can expect to be treated when working at the BBC and, in turn, what is expected of them – including their responsibility to speak up if they see or hear things they believe are not right.

We also recognise that we need to do more work in the area of management information so that we can more easily consolidate all relevant information into one place, thus enabling us better to track the health of the organisation and identify trends.

On screen



We said in February that the BBC has an important duty to do more as a programme-maker, to ensure that the issues Dame Janet and others have raised are given a broad platform and debated fully in the public arena.

In March, for example, we screened *Abused: The Untold Story* on BBC1, a powerful and moving documentary about the survivors of abuse – in their own words. The 90-minute film included contributions from survivors who were breaking their silence, along with journalists and charity workers. It showed how cultural awareness of sexual abuse has greatly increased. The documentary was seen by over 2.3 million viewers on BBC1 and was requested almost 400,000 times on iPlayer. We supported broadcast of the film through additional coverage, debate and interviews with survivors on the *Today* programme, *Victoria Derbyshire* and *Newsnight*. Our News website also provided coverage and a page featuring video of a survivor relating their experience was viewed 200,000 times.

The National Association for People Abused in Childhood (NAPAC) reported that they experienced a doubling of call volumes to their helplines immediately after the programme was transmitted. We are now discussing with NAPAC how we can follow up the programme by helping our producers with guidance on how we document the experiences of victims of abuse and how we support those that come forward.

#### Working with partners

Abused: The Untold Story was a great example of how what we do can be improved by working with – and learning from – partners who understand the complex issues faced by those who have encountered and survived abuse. We are determined to build on what we do already by working with others who have valuable expertise we can use.

As such, we are also discussing with NAPAC how their expertise and good services can be deployed internally as appropriate: for example by attending our child protection adviser network to talk about the dynamics of abuse. Their work is hugely valuable in helping our staff to understand the issues faced by those who have suffered abuse, and also to understand better how to communicate those issues and to learn more about how we can tell the stories of survivors in the clearest possible way.

In June, we also began working with the NSPCC, who have agreed to help and advise us on developing a future-looking Child Protection strategy, which will build on our existing good work – for example, by:

 helping us to strengthen the position of our child protection function and our governance arrangements, embedding good practice further, right across everything we do;



- assessing the right balance of accountability in our relationship with independent producers;
- looking at how we communicate our strategy and use it to help improve standards across our industry; and
- helping us to look closely at what is happening in the digital arena, given how rapidly that is developing.

We will say more about the new strategy in our final response.

## Developing our culture

In February we agreed with Dame Janet's view that we should start work to look in detail at how the culture of the BBC can be developed in order to better support the BBC we want. A great deal of work is already underway.

- In May we commissioned Change Associates, who helped with the Respect at Work
  Report, to gather information and views from a wide range of staff and senior
  management. Their work will give us a clear and unambiguous understanding of
  progress made since we published Respect at Work, making clear where we are now
  and where we need to get to.
- As part of this work, Change Associates have sought the views of our on and off screen talent, recent new entrants, freelancers and our specialised diversity groups.
- We are discussing our approach with other similarly-sized organisations, to learn from others' experiences and compare what we do.
- We are announcing changes to the structure and design of the BBC, to create an organisation that is simpler, leaner and makes the lines of accountability clearer.
- And we have defined and communicated the role of the team manager across the BBC and continue to work with our people managers to develop their skills.

Very many other organisations that we have spoken to have brought together a range of policies that relate to behaviours into a single document, often called a code of conduct or a code of behaviour. We have commenced building a similar approach and need to invest time in doing this well and seeking the active involvement of our staff and unions in writing it. Once complete it will be launched to all existing staff and we will ensure that future new entrants are properly made aware of and trained in what it means for them.

The aim of this work is to move to an approach based on behaviours that better reflect the desired culture of the BBC. In so doing, we want to build and sustain an open and honest culture where people feel free to raise any concerns and are encouraged to do so because they hear their leaders talk about these subjects.



But it is important to stress that this work is not a single project or an initiative that will solve the problems identified by Dame Janet by itself. What we want to do is to begin to embed the culture we want right throughout the organisation – to normalise it as part of an ongoing process. We can't just do this work and finish, just as what we say in our final response to Dane Janet Smith's report in the autumn won't be the end of the story. Instead, we will make sure we have the right tools and processes in place – our staff survey, our staff forums and groups, our independent routes for raising concerns – to enable us to continually understand and react to the views and feelings of our people.

#### The next steps

Whilst we have taken steps to address the recommendations made by Dame Janet and others, there is also more for us to do to ensure that we rebuild trust in our processes and confidence in our approach.

Over the coming months, we will continue to work hard to assess what we do against best practice and ensure we are able to demonstrate we have taken all the current criticisms seriously and with due care. Before we make our final response, we will:

- Continue to implement the findings of our internal review of policies and practices, including strengthening induction and training, simplifying and consolidating our information flows.
- Continue our work with the NSPCC, to develop a new child protection strategy, and with NAPAC to help develop and support our staff.
- Listen to and assess the findings of recent focus groups with our people and the work of Change Associates, using the results to modify our approach and develop our culture as necessary.
- Simplify our policies and make them accessible to all staff in a simple way.
- Review our existing audience controls, to ensure that audiences, including children, coming to our shows and those made for us by our independent partners are looked after and any risks managed in a proper way.
- Continue to develop ways to collaborate across different parts of the BBC, to
  ensure clarity of accountability and responsibility in the areas considered by Dame
  Janet.
- Build our code of behaviour and launch it to staff, putting into practice the kind of behaviours and culture we all want to see in the BBC.

But we can't just look at ourselves internally and ask others to accept that we have made changes and improvements.



We agreed in February with Dame Janet's view that we should not only present to the public an outline of all our policies and practices, but also open ourselves up to further external scrutiny to ensure that those policies and those practices are operating effectively, and in line with best practice.

As such, we have appointed the GoodCorporation to conduct an independent and objective audit of what we do. This will cover:

- reviewing the policies and systems for child protection, whistleblowing, investigations, bullying and harassment and complaints to ensure that they are fit for purpose;
- identifying any gaps in these policies and their deployment, making recommendations for improvement where needed; and
- benchmarking our child protection and whistleblowing policies and systems against the BBC's performance in 2014, to identify whether or not improvements have been made.

The audit will utilise an examination of policies, interviews with staff accountable for those policies and a cross section of BBC staff, individual case reviews and visits to production teams across the UK. This work is scheduled to complete by the end of September and we will share the findings in our final response, alongside our work on culture and the assurances Dame Janet asked for that our policies and processes meet with best practice.

What we are doing now is vital work and we believe it builds upon what was already a strong foundation in the BBC. It is crucial that we learn from what happened, however, and we remain fully aware of the circumstances that led us to this place. We want to make sure we do all we can to support a more open BBC and a more open society, one where people feel they are able to come forward with concerns and know where to go to do so. This is the very least the BBC should do.



## **Annex - Volumes of internal complaints**

The following table summarises the volume of internal complaints received in relation to allegations of bullying, harassment and sexual harassment. Data of this sort is not published by other, similar organisations, so we are unable to compare our performance.

Complaints made and investigated - 2015/16		2014/2015	2013/2014
Bullying and Harassment grievance complaints Notified either direct to HR, via a grievance being raised, or via the confidential B&H help line	41 formal cases <sup>4</sup> :  • I sexual harassment  • 40 bullying and harassment  • 28 closed:  • 4 upheld  • 24 not upheld  • 8 ongoing  • 5 withdrawn  Average time to close case: 58 days	47 cases <sup>5</sup> :  I sexual harassment  46 bullying and harassment  I3 upheld partially  or fully  31 not upheld  2 withdrawn  Average time to close case: 83 days	88 cases <sup>6</sup> :  • 3 sexual harassment  • 85 bullying and harassment Average time to close case: 85 days
Whistleblowing cases <sup>7</sup> Whistleblowing allegations are received either via Expolink, who manage an independent whistleblowing hotline on our behalf, via senior management including the Senior Independent Director, or directly to the Business Assurance and Investigations teams.	31 cases in total (covering a range of issues covering safety, theft, fraud):  o 15 upheld o 12 unsupported o 4 ongoing	20 cases in total	36 cases in total

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<sup>&</sup>lt;sup>4</sup> In addition, in 2015/16, 2 B&H cases were heard as disciplinaries, relating to complaints of misconduct made outside the grievance process

<sup>&</sup>lt;sup>5</sup> In addition, in 2014/15, 2 B&H cases were heard as disciplinaries, relating to complaints of misconduct made outside the grievance process

<sup>&</sup>lt;sup>6</sup> This number includes the numbers of disciplinary cases, of which some may relate to the grievances raised

Where a specific B&H grievance has been raised through Whistleblowing routes, this has been counted in the B&H grievance statistics