



## Whistleblowing Policy (Incorporating Public Interest Disclosure)

NEE/CCG/2013/020

<b>Target Audience</b>	Board members, sub-committee members and all staff working for, or on behalf of, the NEE CCG including agency, contractors, consultants, those on secondment, trainees, volunteers and office holders. This policy is also applicable to provider organisations wishing to put forward a concern.
<b>Brief Description (max 50 words)</b>	This policy sets out the principles by which the North East Essex Clinical Commissioning Group will manage Whistleblowing within the organisation.
<b>Action Required</b>	Following approval by the CCG Board, the revised policy will be communicated to all staff and the latest version uploaded to the website.

### Document Information

<b>Title /Version Number/(Date)</b>	Whistleblowing Policy/4.0/ April 2017
<b>Document Status (for information/ action etc.) and</b>	For immediate implementation
<b>Accountable Executive</b>	Director of Resources (CFO)
<b>Responsible Post holder/Policy Owner</b>	Corporate Business Manager
<b>Date Approved</b>	28 <sup>th</sup> March 2017
<b>Approved By</b>	Board
<b>Review Date</b>	March 2018
<b>Equality Impact Assessment</b>	<b>EQUALITY IMPACT ASSESSMENT</b> This document has been assessed for equality impact on the protected groups, as set out in the Equality Act 2010. This Policy is applicable to the Board, every member of staff within the CCG irrespective of their age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, marriage or civil partnership, and those who work on behalf of the CCG
<b>Contact details for further information</b>	All queries to the Corporate Business Manager 01206 918700.

## Amendment History

Version	Date	Reviewer Name(s)	Comments
2.0	October 2014	Corporate Business Manager	Policy reviewed to produce version 2.0
2.1	January 2015	Chief Finance Officer	A Step 5 process has been added within 7.Procedure on page 13. The contact details for the Local Counter Fraud Specialist on page 16 have been updated.
2.2	January 2015	Corporate Support Officer	Policy review date amended following Board approval of a review period of 12 months.
3.0	December 2015	Corporate Services Manager/Corporate Services Officer/LCFS Mazars	Policy review undertaken.
3.1	March 2016	Corporate Services	Amendments made as suggested at the March Board.
4.0	February 2017	Corporate/Mazars	Details of Public Concern at Work included. Contact details updated and further detail added to section 9) Referring the matter to an external body.

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## **1. Scope**

This policy applies to all North East Essex Clinical Commissioning Group (NEE CCG) employees; Board members, including Lay members; contractors; and any third parties working on behalf of NEE CCG, irrespective of hours worked, whether employed permanently, or their length of service.

For the purposes of this policy when reference is made to 'staff' this applies to all staff groups including commissioner and provider organisations.

## **2. Equality Impact Assessment**

This policy has been assessed for equality impact. This policy is applicable to every member of staff within the CCG, irrespective of their race, ethnic origin, nationality, gender, culture, religion or belief, sexual orientation, age or disability.

## **3. Introduction**

NEE CCG has in place a number of policies and procedures to enable managers and staff to resolve concerns or issues that may arise during the course of employment or delivery of services. If there are concerns about unlawful conduct, financial malpractice, dangers to the public or environment or patient care it may be difficult to know what to do and this Policy provides a framework for internal and external staff to raise any such concerns in line with the Public Interest Disclosure Act 1998, and enable concerns about any malpractice to be raised at an early stage and in the right way.

NEE CCG aims to create an environment where all staff are able to raise concerns about malpractice without fear of victimisation and encourage staff to express any concerns in a constructive way and to put forward suggestions, in order to contribute towards the delivery of care and services to patients or clients.

NEE CCG endorses the right and duty of individual staff to raise any matters of concern they may have about health service issues concerned with the delivery of care or services to a patient or client of the CCG, or about financial malpractice, unlawful conduct, dangers to health and safety and the environment. All issues and concerns raised under this policy will be dealt with in a thorough and fair manner.

NEE CCG believes that a culture of openness and dialogue is in the best interests of patient care. However, this must be set in the context of our duty of confidentiality to patients and the CCG. This policy sets out the procedures which have been put in place for staff if they wish to raise their concerns, and the responsibilities managers at all levels have to ensure that these are dealt with thoroughly and fairly.

You may want to raise a concern in confidence under this policy. If you ask us to protect your identity, we will not disclose it without your consent. If the situation arises where

we are not able to resolve the concern without revealing your identity (for example, your evidence may be needed in court), we will discuss with you whether and how we can proceed.

NEE CCG will consider anonymous reports, but this policy does not cover concerns raised anonymously.

The CCG has a lead Lay Member for Whistleblowing who is Chair of the Audit Committee, their contact details are shown in 12. Document Information and Contact details.

### **Right of Representation**

A staff member has the right to be accompanied at any stage of the whistleblowing procedures, by either a Trade Union representative or work colleague. Legal representation is not permitted at any stage. The staff member is responsible for making their own arrangements for any representation required.

### **Victimisation**

NEE CCG aims to create an environment where members of staff are able to raise concerns about malpractice without fear of retaliation or victimization (See section 4.). Any member of staff who is believed to be victimising another employee for raising concerns under this policy will be investigated and if proven, the matter will be regarded as serious; possibly gross misconduct, and relevant disciplinary action taken in line with the CCG Disciplinary Policy.

### **Support Available**

NEE CCG recognises that anyone making a disclosure under this policy may require someone to talk to in confidence, or counselling, to assist them in coping and dealing with the situation. The support provided will be in the strictest confidence, non-judgmental and free from bias.

Alternative methods of reporting and support services include:

- **HR** who will provide advice, support and guidance to anyone involved in the process, contact details of which can be found within section 12.
- **Trade Union Representative** who will provide advice, support and guidance to any of their members involved in the process
- **Occupational Health** who can provide advice and support on a personal level including Counselling if appropriate.
- **Whistle-blowing helpline** is free, independent and confidential and offers advice to employees and organisations working within the NHS and Social Care. The helpline

number is 08000 724 725 and operates on weekdays between 08.00 and 18.00 with an out-of-hours answering service available at weekends and on public holidays. You can contact the helpline if you have concerns but are unsure how to raise them or simply want advice on best practice.

- **Public Concern at Work** an independent charity who provides free confidential advice about malpractice at work and offers advice to employees with whistleblowing dilemmas. They also support organisations with their whistleblowing arrangements and inform on public policy seeking legislative change. For whistleblowing advice call 0207 404 6609 or see their website [www.pcaw.org.uk](http://www.pcaw.org.uk)

#### **4. Legal Context**

The Public Interest Disclosures Act, 1998 came into force in July 1999 and aims to protect staff and workers who raise genuine concerns and report their employer for breaking the law or for serious matters of malpractice from victimisation and dismissal. An employee or staff member who “blows the whistle” will be protected if the disclosure is in good faith and they follow agreed internal procedures. Such procedures must include explanation as to when disclosure to external bodies including the police, the media and members of parliament would be acceptable. They must not act for the purpose of financial gain.

#### **5. How we will handle the concern**

5.1 Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. The investigation will be objective and evidence based, and will produce a report that focuses on learning lessons to prevent problems recurring. We will tell you who is handling the matter, how you can contact him / her and whether your further assistance may be needed. If you request it, we will write to you summarising your concern and setting out how we propose to handle it.

5.2 We are committed to listening to our staff, learning lessons and improving patient care. On receipt, the concern will be recorded and you will receive an acknowledgement within two working days. The central record will record the date the concern was received, whether you have requested confidentiality, a summary of the concerns and dates when we have given you updates or feedback.

5.3 If the concern relates to another organisation we will advise you to report the matter to one of the Whistleblowing contact points in the organisation to which the matter refers.

5.4 Once an investigation has taken place and if it is a case where there has been evidence of malpractice the options for possible sanctions include;

- Criminal Prosecution; and/or

- Civil Proceedings; and/or
- Disciplinary Action; and/or
- Refer to Professional Body.

5.5 When you raise your concern you may be asked how you think the matter might best be resolved. If you do have any personal interest in the matter, we do ask that you tell us at the outset. If your concern falls more properly within the Grievance Procedure we will tell you.

5.6 If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

## 6. Roles & Responsibilities

### 6.1 Employees/Staff member

Employees or member of staff should:

- Act without delay
  - Inform someone of authority
  - Raise your concerns in writing if people are at risk
  - Be professionally accountable for acts or omissions
  - Must be able to justify decisions
- raise genuine concerns relating to patient services or matters they consider to be damaging to the interests of a patient, client, a member or members of staff, the environment or the NHS as a whole, in accordance with this policy
  - exhaust the internal procedures of the organisation before considering approaching external agencies
  - maintain patient and client confidentiality. Advice should be sought from your trade union or professional association before disclosing confidential information, even if it is deemed to be in the public interest. Unauthorised disclosure of personal information about any patient or client will be regarded as a most serious matter and may lead to disciplinary action.

### 6.2 Managers

Managers should ensure:

- staff are given every opportunity to contribute their views on all aspects of health service activities, especially about delivery of care and services to patients or clients
- that a culture exists where staff feel that their views will be welcomed, appreciated and, where appropriate, acted on positively
- that any concerns raised are taken seriously
- that staff concerns are investigated properly and that the staff member is kept advised of progress

- that any action necessary to resolve the issue is taken
- that under no circumstances staff who express their genuine concerns about health service issues in accordance with this policy are penalised in any way for doing so

### **6.3 NEE CCG**

NEE CCG will ensure that:

- staff are given every opportunity to contribute views
- if managers receive specific concerns they must keep the staff member informed of the progress of any investigation. If no action is to be taken, the employee must be given the reasons for this decision
- every effort is made to keep the identity of the discloser confidential, providing they act in accordance with this policy and procedure.
- appropriate support is offered to any discloser where their identity has to be revealed
- processes are in place and up to date to support staff members to raise concerns internal, external and confidentially

### **6.4 Human Resources**

Human Resources have a responsibility to:

- ensure this policy and procedure is easily accessible to all employees via the NEE CCG intranet
- ensure any issues relating to whistleblowing are dealt with in accordance with this policy
- provide support, guidance and advice to managers and staff throughout the stages of this policy
- ensure the policy is updated annually in line with current legislation and best practice. Although the policy may be updated more regularly should legislation dictate.
- provide communication and training as necessary to ensure understanding of the policy and procedures
- recognise the importance of understanding and being aware of the legislation to protect those who raise concerns and know how to access the appropriate guidance, legislation and communication tools

### **6.5 Local Counter Fraud Specialist**

The LCFS is responsible for taking forward all anti-fraud work locally in accordance with national standards and reporting directly to the Director of Resources (CFO)



Adhering to NHS Protect standards is important in ensuring that the organisation has appropriate Whistleblowing procedures in place and the LCFS can effectively respond to system weaknesses and investigate allegations of fraud and corruption.

It is the LCFS's role to investigate any allegations of fraud. When investigating, the LCFS will need to liaise with employees within the organisation such as Human Resources to obtain relevant documentations which may support or disprove any allegations of fraud. The LCFS will conduct risk assessments in relation to their work to prevent fraud, bribery and corruption.

## **7. Definitions**

### **7.1 Openness**

Openness is defined as the disclosure by an employee or ex-employee, of confidential information which relates to any wrong doing such as fraud, malpractice, mismanagement, breach of any health and safety law or any other illegal or unethical conduct connected with the workplace including patient care, on the part of any employee of NEE CCG .

### **7.2 Qualifying Disclosures**

Certain kinds of disclosures qualify for protection – “Qualifying Disclosures”. These are disclosures of information which an employee reasonably believe tends to show one or more of the following is happening, took place in the past or is likely to happen in the future:

- A criminal offence
- Miscarriage of justice
- Failure to comply with legal obligations, breaches of legislation, e.g. Data Protection
- A danger to the health and safety of any individual
- Risks or damage to the environment
- Information that any of the above has been, is being or is likely to be deliberately concealed

In making a disclosure or ‘blowing the whistle’ an employee must have a reasonable belief that the information disclosed tends to show that one or more of the above offences or breaches, is, or has taken place. The belief need not be correct; if it is discovered subsequently that the employee was in fact wrong, they must be able to

show that it was a reasonable belief to hold, in the circumstances at the time of the disclosure.

A disclosure of information is not a qualifying disclosure if the person making the disclosure commits a criminal offence by raising the matter or if it is made by a legal adviser to whom the information has been disclosed in course of a client obtaining legal advice.

### 7.3 Protected Disclosures

A protected disclosure is a qualifying disclosure made in good faith by the employee in accordance with one of the following procedures. Disclosure to:

- NEE CCG or other Responsible Person
- A Legal Adviser
- A Minister of the Crown
- A Prescribed Person
- Other Cases
- An Exceptionally Serious Failure

#### 7.3.1 NEE CCG or Other Responsible Person

A member of staff can make disclosures in good faith to NEE CCG or to a person the individual reasonably believes is responsible for that matter (other than NEE CCG) and which falls within the list under section 6.3 above.

Any qualifying disclosure should be made using the procedure outlined in Section 7 of this Policy.

#### 7.3.2 Disclosure to Legal Adviser

A qualifying disclosure is a protected disclosure if it is made in the course of obtaining legal advice.

#### 7.3.3 Disclosures to Ministers

Where someone in the NHS or a public body 'blows the whistle' in good faith direct to the Sponsoring Department, for example the Department of Health, the disclosure is protected.

#### 7.3.4 Prescribed Person

An employee can make a disclosure, in good faith, to a prescribed person or body, where they reasonably believe that the information and any allegation in it are

substantially true and the disclosure falls within the jurisdiction of the person. Examples include:

- Health and Safety risks : HSE and local authority
- Environmental issues: the Environment Agency
- Financial Services Authority
- Fraud and fiscal irregularities: Serious Fraud Office, HM Revenue & Customs (Inland Revenue), , NHS Protect, NEE CCG's Local Counter Fraud Specialist
- Others: Occupational Pensions Regulatory Authority
- Office of Fair Trading

### 7.3.5 Other Cases

A qualifying disclosure is a protected disclosure if:

- The employee makes the disclosure in good faith
- he/she believes the information disclosed and any allegation contained in it, are substantially true
- he/she does not make the disclosure for financial or personal gain
- any the above 3 conditions are satisfied and:
  - the employee believes they will be subjected to a detriment by NEE CCG if they make a disclosure to NEE CCG or a prescribed person
  - the employee believes evidence is likely to be concealed or destroyed if they make a disclosure
  - the employee has previously made a disclosure of substantially the same information
- If all of the above are satisfied it is reasonable for the employee to make the disclosure

Factors to be taken into account to determine if the disclosure was reasonable are:

- The identity of the person to whom the disclosure is made
- The seriousness of the matter
- Whether there is a continuing failure to deal with the matter or such a failure is likely to occur in the future
- Whether the disclosure is made in breach of a duty of confidentiality
- Any action which might reasonably be expected to be taken as a result of any previous disclosure
- Whether the employee complied with any NEE CCG procedure for making a disclosure

### 7.3.6 Exceptionally Serious Failure

A qualifying disclosure is a protected disclosure if

- The employee makes the disclosure in good faith
- he/she believes the information disclosed and any allegation contained in it, are substantially true
- he/she does not make the disclosure for financial or personal gain
- the matter is of an exceptionally serious nature
- In all the circumstances of the case it is reasonable for the employee to make the disclosure. Regard should be given in particular to the identity of the person to whom the disclosure is made.

### 7.4 External Disclosures

Employees should follow the procedures outlined in this policy for expressing concerns. If they consider the evidence would be destroyed or they would be penalised for raising the issue then the matter can be disclosed to a person prescribed (appointed by the Secretary of State) before consulting a member of parliament in confidence or disclosing the issue to the media. If external disclosure is made unjustifiably, it could result in disciplinary action and might unreasonably undermine public confidence in the Service.

However, employees will be protected in accordance with the provisions of the Public Interest Disclosure Act 1998. Wider disclosures may be protected under the Act, without being raised first with the employer or prescribed regulator, only if such disclosures are:

- not made for personal gain
- the employee reasonably believed they would be victimised if she/he did so
- there is no prescribed regulator
- the employee reasonably believed there would be a cover-up; or
- the matter was exceptionally serious.

In addition, they must have a reasonable belief that the information disclosed and/or the allegations are substantially true, and it is made reasonably in all the circumstances.

## 8. Procedure

Staff members should raise genuine concerns relating to patient or client services in accordance with this procedure. The procedure should be exhausted before consideration is given to raising the issue with an external agency.

The procedure is for use if you have any concerns at all about wrongdoing within the CCG or within a commissioned service including any criminal offence, failure to comply with legal obligations or professional codes of practice, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these.

If your concern is a personal complaint about your employment that affects only you, rather than a concern about something that affects others, then you may wish to raise a grievance using our grievance policy.

### 8.1 Step 1

Staff who have concerns about service provision or patient care, should in the first instance, raise these with their direct line manager.

It is acknowledged that for some staff this will be a difficult experience, and managers should ensure that a member of staff concerns are taken seriously and that they are given full and objective consideration.

Any concerns raised will be treated as strictly confidential and will not result in you being named in any report to anyone both internally and externally to the NEE CCG, unless you have given your permission. If there is no alternative to this course of action you will be advised and the reasons discussed with you.

If your concern is about your manager, you should take the matter up with the next line of management.

Your issue will be acknowledged within 10 (ten) working days and you will be advised of the action being taken.

Where the issue is complex, or further investigation is required you will be advised of this and a time scale for the completion of the investigation given. Upon completion of the investigation you will be notified of what action has been taken as a result. Where action is not considered practicable or appropriate, you will be advised of the reasons for this.

### 8.2 Step 2

If you are dissatisfied with the outcome of Step 1 the matter can be raised with the next managerial level, unless you report directly to that manager, in which case this will be the first stage and you should contact a Director.

It is acknowledged that for some staff this will be a difficult experience, and managers should ensure that employee concerns are taken seriously and that they are given full and objective consideration.

Any concerns raised will be treated as strictly confidential and will not result in you being named in any report to anyone within NEE CCG, unless you have given your permission or there is not an alternative to this course of action, in which situation you will be advised.

Your issue will be acknowledged within 10 (ten) working days and you will be advised of the action being taken.

Where the issue is complex, or further investigation is required you will be advised of this and a time scale for the completion of the investigation given. Upon completion of the investigation you will be notified of what action has been taken as a result. Where action is not considered practicable or appropriate, you will be advised of the reasons for this.

### 8.3 Step 3

If an issue is not resolved in Steps 1 and 2 you can raise your concerns directly, in writing, with the Director of Resources (CFO) who will investigate the matter and respond to you within 10 (ten) working days of receiving your notification.

### 8.4 Step 4

If the matter is still not resolved for the individual, the matter should be raised, in writing with the Chairman. The Chairman, or Vice Chairman, will investigate the matter and respond to you within 10 (ten) working days of the receipt of your notification.

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### 8.5 Step 5

If at this stage you are not completely satisfied that the matter has been resolved or appropriately dealt with or there is a conflict of interest, you can raise your concerns with the Chair of the Audit Committee whose contact details can be found on page 16 under item 11 Document Information.

## **9. Referring the matter to an external body**

In cases where you feel that the matter has not been fully resolved and the risk continues contacting the regulatory bodies including Care Quality Commission, Monitor, or professional body such as GMC NMC or CSP.

If the individual perceives there is an immediate risk to life then it is recommended that they should consider calling the emergency services.

In cases of fraud and/or bribery the member of staff may approach either NEECCG's Local Counter Fraud Specialist ('LCFS'), the contact details for whom can be found in section 12 of this policy, or on the dedicated counter fraud intranet page and in various locations throughout NEE CCG e.g. posters and leaflets on notice boards or the Local Counter Fraud Specialist for their own organisation.

Where all of the above options have been exhausted in regard to reporting fraud, bribery or corruption if you feel the matter has not been resolved you are entitled to report your concerns to the Police or Crimestoppers in the first instance please report your concerns to the LCFS or Director of Resources (CFO),

Where a suspicion of fraud, bribery or corruption is suspected against the LCFS or Director of Finance, a report should be made to NHS Protect through their reporting hotline – 0800 028 40 60. Informants to this service can remain anonymous. Informants should also stipulate in the referral that it involves either the LCFS or Director of Resources who will not be made aware a report has been made. If the report is not clearly related to the LCFS, the LCFS will be made aware.

Before taking this course of action you are advised to seek guidance from your trade union representative or professional body.

Any such action may result in an investigation being carried out and where a disclosure was found to be malicious, inappropriate or inaccurate disciplinary action may be taken. It should be noted that any disclosure made in good faith but found to be false will not be subject to any adverse actions.

## **10. Frequently Asked Questions**

### **Q. What is Whistleblowing?**

**A.** Whistleblowing is when an employee or worker provides information to the organisation or a regulator about illegal or dishonest practices, which have come to their attention through work. The whistleblower is usually not directly, personally, affected by the danger or illegality. Whistleblowing occurs when a worker or employee raises a concern about danger or illegality that affects others, for example members of the public.

**Q. Is there Whistleblowing legislation?**

**A.** Yes, the key piece of legislation is the Public Interest Disclosure Act 1998 which applies to almost all workers and employees who ordinarily work in Great Britain. There are other related Acts including Employment Rights Act 1996 and the Management of Health & Safety at Work Regulations 1999, and the Fraud Act 2006.

The Public Interest Disclosure Act 1998 was passed following the Zebrugge disaster and the Bristol Royal Infirmary Heart operations scandal which may have been prevented if workers who knew about the dangers had not been too scared to blow the whistle.

**Q. Can I be dismissed for blowing the whistle?**

**A.** If you make a qualifying disclosure in good faith it will be regarded as unfair dismissal if your contract is terminated for any reason connected with the issue you raise. However, if you make a disclosure that is malicious, inappropriate or inaccurate disciplinary action may be taken and may result in dismissal.

**11. Cross Reference to other Policies**

This policy should be read in conjunction with the [CCG's Anti-Fraud and Bribery Policy](#), [Managing Conflicts of Interest, Gifts, Hospitality and Sponsorship Policy](#), [Dignity at Work Policy](#) and [Safeguarding Adults at Risk Policy](#).

NEE CCG operates a zero-tolerance to any attempts at bribery by, or of, its employees and encourages all employees and associated persons to report any suspected attempts or activity, in accordance with the procedures outlined in the Anti-Fraud & Corruption Policy. Any employee who reports a suspected bribery in good faith will be supported even if, following an investigation, there is no finding that bribery took place.



## 12. Document Information and Contact details

<b>Original Author:</b>	Human Resources – NHS North East Essex		
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