

COUNCIL

Whistleblowing Policy Update

Meeting: 26 February 2020

Status: For noting

Lead responsibility: Lesley Longstone (Chief Executive & Registrar)

Paper author: Erica Wilkinson (Head of Secretariat)

Council Leads(s): Claire Minchington

Purpose

1. To provide an update as to progress with the drafting and review of the Whistleblowing policy.

Recommendations

2. Council is asked to note this paper and be aware that the draft policy will be circulated to Council for approval in between the February and May meetings.

Strategic objective

3. This work contributes towards the achievement of a trusting culture and the management of major reputational risks.

Background

4. The GOC needs to ensure that it creates an open, transparent and safe working environment where employees feel they are able to communicate any perceived wrongdoing.
5. Although it is not a legal requirement for employers to have a whistleblowing policy in place the GOC wishes to demonstrate its commitment to listen to concerns of employees.
6. The Whistleblowing Policy covers disclosures of a serious corporate nature, which are clearly defined in the policy with the Disciplinary Policy and Grievance Policy being signposted where relevant.
7. The Disciplinary Policy and Grievance Policy are currently going through the Policy Review Process enabling the GOC to have a full suite of fit for purpose complaints related policies.

8. Full consultation is taking place with the relevant leads within the organisation to ensure that these related policies are consistent, and the full scope of disclosure, grievance and complaints are covered.
9. The GOC believes that it is essential for the organisation to set the standards for whistleblowing by way of example for the businesses it oversees and to instil a culture that encourages and supports employees to make disclosures where they deem necessary.
10. The draft policy has been considered by our internal Policy Review Group which forms part of our Policy Review Process. The next stage is for the draft policy to be considered by the “Like it or Strike it Group”, thereafter, the final process of staff consultation will take place, which takes approximately two weeks. Given the timeframes, we are aiming for a final draft to be sent out for Council’s consideration and approval towards the end of March.

Analysis

11. The internal audit carried out by Mazars in December 2019, which has been duly considered by the Audit, Risk and Finance Committee, highlighted challenges that the GOC faces in encouraging an open and honest reporting culture, with some confusion regarding the difference between whistle-blowing and other complaints.
12. We have addressed these challenges by ensuring that the policy we provide is clear in definition and process. The suite of policies, as mentioned above, will dovetail to cover complaints, grievances and whistleblowing and will be rolled out with effective training.
13. The policies and the training will demonstrate that we take our responsibilities very seriously. Through the training provided, all employees will have a full understanding of the support mechanisms that are in place to deal with disclosures and complaints.

Finance

14. Training will be delivered in-house and so there are no financial implications regarding the implementation of the policy.

Risks

15. This policy is a mitigating action in relation to risks of impropriety, providing a mechanism by which concerns can be identified and addressed at an early stage, minimising financial or reputational damage.

Equality Impacts

16. An impact assessment has been completed and considered as part of the Policy Review Process and does not raise any adverse issues.

Devolved nations

17. Relevant legislation is UK wide.

Other Impacts

18. No other impacts have been identified.

Communications

External communications

19. Once approved this policy will be made available on our website.

Internal communications

20. Relevant training will take place within Q1 2020/2021 .

Next steps

21. Training to staff and continued improvement in dealing with disclosures, grievances and complaints.