

SCOTTISH POLICE
AUTHORITY

Meeting	Public SPA Board Meeting
Date	25 May 2017
Location	Golden Jubilee Conference Hotel, Clydebank
Title of Paper	SPA Whistleblowing Policy
Item Number	15.1
Presented By	John Foley
Recommendation to Members	For Approval
Appendix Attached	Yes

PURPOSE

The purpose of this paper is to;

- confirm the process that took place to determine the SPA Policy and Guidance should mirror Police Scotland's approach with differences in processes for SPA being recognised; and,
- seek approval for its implementation.

1. BACKGROUND

- 1.1 Following the publication of the Review of Governance in Policing, which stated that it may be appropriate to have separate SPA and Police Scotland Whistleblowing policies to recognise any distinct and subtle issues, progress was made in relation to the development of a Whistleblowing Policy for SPA. Following consultation with the SPA SMG and key SPA Members, a version was circulated for consultation with stakeholders including staff from Corporate and Forensic Services, Trade Unions and HMICS.
- 1.2 Feedback from HMICS and UNISON reflected a strong view that the approach to whistleblowing for SPA and Police Scotland should be similar, where possible. The feedback also recognised that positive work and significant internal and external consultation had been progressed in relation to Police Scotland's draft Whistleblowing Policy and Guidance.
- 1.6 Prior to the Full Board, the SPA Whistleblowing Policy has been considered and endorsed by the Counter Corruption Reference Group and recommended to the Board for approval by the People Committee. In addition the paper was provided to the Audit Committee and actions have been taken to provide assurance in relation to the monitoring, communication and training of whistleblowing at the next Audit Committee.

2. FURTHER DETAIL ON THE REPORT TOPIC

- 2.1 Rather than dual brand the Whistleblowing Policy and Guidance the decision was taken to have separate SPA and Police Scotland documents that mirror each other, whilst recognising different routes of escalation within each organisation.
- 2.2 This approach aims to mitigate any risk that Police Scotland or SPA staff inadvertently use the wrong route of escalation and therefore would not be legally protected under whistleblowing legislation.

3. FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications in this report.

4. PERSONNEL IMPLICATIONS

- 4.1 There are no personnel implications associated with this paper.

5. LEGAL IMPLICATIONS

5.1 There are no further legal implications in this paper to those listed above.

6. REPUTATIONAL IMPLICATIONS

6.1 There are no reputational implications associated with this paper.

7. SOCIAL IMPLICATIONS

7.1 There are no social implications associated with this paper.

8. COMMUNITY IMPACT

8.1 There are no community implications associated with this paper.

9. EQUALITIES IMPLICATIONS

9.1 There are equality implications associated with this paper.

9.2 Individuals with a protected characteristic may in some circumstances, need extra safeguards or support to protect them from potential harassment, victimisation or bullying. The Whistleblowing Policy and Guidance contains specific reference to this point and SPA are committed to the principles outlined in the Equality Diversity and Dignity SOP and does not tolerate any form of discrimination, victimisation, bullying or harassment.

9.3 SPA will monitor and evaluate any issues and concerns raised in order to identify and respond to any trends and ensure all statutory duties are met under the Equality Act 2010 and the Public Sector Equality Duties.

10. ENVIRONMENT IMPLICATIONS

10.1 There are no equality implications associated with this paper.

RECOMMENDATIONS

Members are requested to:

Review and approve the SPA Whistleblowing Policy and Guidance for implementation.

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**Whistleblowing
Policy**

Owning Department:	SPA Complaints and Conduct Team
Version Number:	1.00
Date Published:	DD/MM/YYYY

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Compliance Record

Equality and Human Rights Impact Assessment (EqHRIA):	Date Initially Completed	DD/MM/YYYY
	Reviewed/Updated	DD/MM/YYYY
Information Management Compliant:	Yes/No	
Health & Safety Compliant:	Yes/No	
Publishable Externally in Current Format:	Yes/No	

Version Control Table

Version Number:	History of Amendments:	Date:
V0.04	Initial draft – HR Policy Formatted	DD/MM/YYYY
V1.00	Authorised version	DD/MM/YYYY

The Scottish Police Authority (SPA) are committed to developing and maintaining a safe working environment for all individuals. This commitment is reflected in the SPA values.

It is important that individuals are empowered to raise concerns with confidence and that such concerns are properly addressed. Individuals are often the first to realise that there may be something wrong within their workplace. SPA views reporting of this as a positive act.

SPA is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices. This Policy and associated [Guidance](#) encourages individuals to report any concerns, confident that they will be properly addressed.

That [Guidance](#) and this Policy applies to authority staff, contractors and agency staff working for SPA Corporate and Forensics.

All activity undertaken in respect of both this Policy and the associated [Guidance](#) will reflect the values of Accountability, Integrity and Respect and ensure the requirements of the [Human Rights Act \(1998\)](#) are discharged.

SCOTTISH POLICE
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Whistleblowing Guidance

Owning Department	SPA Complaints and Conduct Team
Version Number	1.00
Date Published	DD/MM/YYYY

Compliance Record

Equality and Human Rights Impact Assessment (EqHRIA): Date Completed/Reviewed:	DD/MM/YY
Information Management Compliant:	Yes/No
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Version Control Table

Version	History of Amendments	Approval Date
1.00	Initial Approved Version	DD/MM/YY

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1. Introduction

- 1.1 This guidance applies to all members of authority staff, contractors and agency staff working for SPA Corporate and Forensics, referred to as authority staff from this point forward. Police Scotland has its own whistleblowing policy and guidance for police officers and members of police staff.
- 1.2 It provides guidance on how whistleblowing will be undertaken for SPA.
- 1.5 This guidance only applies to whistleblowing. Complaints relating to grievances or bullying or harassment should be raised using the relevant procedures: - [Grievance SOP](#); [Disciplinary SOP](#) (authority/police staff); [Complaints about the Police SOP](#).
- 1.6 SPA wants to create an environment where individuals feel confident to come forward to raise concerns when they reasonably believe that the wrong thing is being or has been done.
- 1.7 Such an environment is often referred to under the title of Whistleblowing and has many potential benefits to any organisation. It is an environment which is encouraged within SPA.
- 1.8 Whistleblowing is welcomed by SPA as an important source of information that may highlight serious risks to the effectiveness and efficiency of the organisation or potential fraud or corruption.
- 1.9 Individuals are often best placed to identify deficiencies and problems before any damage is done, so the importance of their role as the 'eyes and ears' of SPA cannot be overstated.
- 1.10 Encouraging people to speak out has many benefits, it:
 - Protects others by preventing wrong-doing
 - Promotes a culture of openness and transparency
 - Protects and reassures others in the workforce
 - Helps to maintain a healthy working culture and an effective and efficient organisation
- 1.11 SPA's willingness to examine areas of potential weakness and to listen carefully to issues and concerns raised by individuals' means prompt action can be taken to address potential problems.
- 1.12 Within SPA there are a range of opportunities for individuals to raise concerns, including speaking with line managers, Heads of Function and using SPA/Police Scotland's online confidential reporting system, [Integrity Matters](#).
- 1.13 [Integrity Matters](#) is an online confidential reporting mechanism providing an opportunity for all individuals to anonymously report any concerns they have regarding unethical, unacceptable, unprofessional or illegal behaviour.

- 1.14 The [Public Interest Disclosure Act \(1998\)](#) is the legislation that pertains to whistleblowing. It sets out the protections afforded to whistleblowers as well as the types of situation where it would be reasonably expected for an individual to raise a concern. These details are set out in Section 3 below.

2. Whistleblower or Not?

- 2.1 A simple way to establish whether an individual is likely to be regarded as a 'whistleblower' or not is to consider what the issue is about:
- Does it raise issues for 'others' e.g. the organisation, colleagues, clients, or the wider public? If yes, then it is likely to be treated as whistleblowing.
 - Does it raise issues which really only concern the individual ('self') e.g. a personal grievance about terms of employment, pay, or unfair treatment? If yes, then it is more likely that it should be raised as a grievance or bullying and harassment matter – although it could still be whistleblowing if it is assessed to be so serious as to be in the public interest too.
- 2.2 Generally a whistleblower has no self interest in the issue being raised. However, the distinction may not always be clear cut.

3. Who is Protected by the Law and What Types of Concerns Could be Raised as Whistleblowing?

- 3.1 As discussed in paragraph 1.13 above, the [Public Interest Disclosure Act \(1998\)](#) sets out the situations where it would be expected that an individual may blow the whistle. Where that occurs, the [Public Interest Disclosure Act \(1998\)](#) offers the whistleblower certain protections.
- 3.2 You're protected if you're a 'worker', e.g. you are:
- An employee, such as a member of authority staff
 - An agency worker or contractor working for SPA Corporate or Forensics;
- and you disclose any information which in your **reasonable belief** is made in the **public interest** and tends to show one or more of the following:
- that a criminal offence has been committed, is being committed or is likely to be committed
 - that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
 - that a miscarriage of justice has occurred, is occurring or is likely to occur
 - that the health or safety of any individual has been, is being or is likely to be endangered
 - that the environment has been, is being or is likely to be damaged

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- that there has been or is likely to be deliberate concealment of information tending to show any of the above

3.3 The individual raising the concern only needs to have a **reasonable belief** that the issue has occurred, is occurring, or is likely to occur in the future. It is best to raise the concern as early as possible, even if it is only a reasonable belief, to allow the matter to be looked into promptly.

3.4 Evidence or proof of wrongdoing is not necessarily required, albeit this would assist in supporting the concerns raised. However provided the reporting is based upon a reasonable belief, it does not matter that the individual may be mistaken.

4. Responsibilities to Report Wrongdoing

4.1 All authority staff are expected to report any criminal offence that is disclosed to them.

4.2 By failing to act you may be assisting in the wrongdoing and may be liable for criminal and/or misconduct proceedings depending on the seriousness of the wrongdoing.

4.3 There is a legal obligation in respect of reporting Health and Safety matters.

4.4 Individuals must never ignore situations where colleagues are behaving unethically or unprofessionally, irrespective of the individual's rank, grade or role.

4.5 All staff have a positive obligation to question the conduct of colleagues that they believe falls below expected standards and, if necessary, challenge, report or take action against such conduct.

4.6 How such breaches should be reported is set out below within Section 6.

5. Assurances

5.1 Confidentiality

5.1.1 Concerns can be raised openly, confidentially or anonymously.

5.1.2 If a concern is raised in confidence, SPA will seek to respect that confidence as far as possible.

5.1.3 It may not always be possible to maintain confidentiality, for example when the concern relates to a matter of criminality. Where this is the case, the matter will be discussed with the reporter, and where possible, consent gained prior to taking any action which could identify them. Should such consent not be

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gained, then the person receiving the report should consider whether the issue might be resolved without the reporter being identified and whether this would be appropriate. If not, then this should be made clear to the reporter and they should be supported appropriately.

5.1.4 It is important to note that all information which relates to individuals will be managed in accordance with the rights and obligations provided under the Human Rights Act 1998 and the Data Protection Act 1998.

5.1.5 All individuals dealing with reporters should be mindful of practical steps to ensure confidentiality is maintained, for example:

- Ensuring that documents are properly classified in line with [Government Protective Marking Scheme \(GPMS\) SOP](#) and that electronic files are properly protected
- Ensuring that the minimum number of people necessary have access to documents
- Being discreet about when and where any meetings are held with the reporter
- Ensuring that sensitive case papers are not left in open view to those who are not entitled to see them
- Advice and guidance in relation to information security is available in the Information Security SOP

5.2 Support and Protection from Harassment

5.2.1 SPA are committed to supporting anyone who has raised a concern and will not tolerate their harassment or victimisation where their confidentiality has not been maintained.

5.2.2 Where the reporter feels that this has not been achieved then it is important that they work with SPA to resolve matters. This should be done through line management or through escalation to a Director/Head of Function.

5.2.3 Where an individual raises a concern, they should be aware that the protections afforded continue indefinitely. To that end, no detriment should be suffered by reporters at any point in the future, for example raising a concern will not affect an individual's progression. Should reporters remain concerned about issues of confidentiality, then it may be appropriate for them to consider reporting their concern via [Integrity Matters](#).

5.2.4 The [Employee Assistance Programme \(EAP\)](#) can provide emotional support and legal advice to any member of staff who has reported a concern. The [EAP](#) can be accessed at any stage in the process of reporting concerns.

5.2.5 If however, this has not been successful then it may be that the complainer may wish to seek remedy through an Employment Tribunal.

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- 5.2.6 Advice on access to Employment Tribunals can be found by visiting [Citizens Advice Scotland](#), [ACAS](#) or [Public Concern at Work](#). Additionally, reporters may seek advice from their Trade Union or Staff Association.
- 5.2.7 Reporters should note time frames for raising an action at an Employment Tribunal are limited. In general, this should be done within three months, less one day from the incident taking place.
- 5.2.8 SPA are committed to supporting any whistleblower who has raised a concern and will not tolerate their harassment or victimisation. It is recognised that individuals with a protected characteristic may in some circumstances, need extra safeguards or support to protect them from harassment, victimisation or bullying.
- 5.2.9 SPA is committed to the principles outlined in the [Equality Diversity and Dignity SOP](#) and does not tolerate any form of discrimination, victimisation, bullying or harassment.

6. How to Blow the Whistle

6.1 Option One

- 6.1.1 When an individual has a concern they wish to raise, if appropriate, it should be raised first with their line manager or another manager. This can be done verbally or in writing.
- 6.1.2 Notwithstanding Section 3 - 'Who is Protected by the Law and What Types of Complaints Could be Raised as Whistleblowing?' above, all concerns will, at the outset be treated in confidence.
- 6.1.3 Should the individual wish to, they may be accompanied by a Trade Union or Staff Association Representative or colleague at any meeting.
- 6.1.4 It is the responsibility of the manager to raise issues of confidentiality with the reporter and to record both the wishes of the reporter and, where that confidentiality cannot be guaranteed, to set out the rationale why that is the case and record that this has been discussed with the reporter.6.2

6.2 Option Two

- 6.2.1 If, for whatever reason the individual raising the concern feels that raising it with a manager is not appropriate, or it has not worked, the concern may be raised with one of the following:
- A Director/Head of Function
 - The Chief Executive Officer
 - Report your concern via the on-line [Integrity Matters](#) system and use this as a means of reporting

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6.2.2 It is the responsibility of individuals noted at 6.1.1 with whom the concern is raised, to discuss issues of confidentiality with the reporter and to record both the wishes of the reporter and, where that confidentiality cannot be guaranteed, to set out the rationale why that is the case and record that this has been discussed with the reporter.

6.2.3 The presumption exists that all concerns will be treated in confidence. However, there may be instances where that presumption cannot be met due to legal requirements. Where this is the case, the responsibility lies with the manager to explain the rationale for this decision to the reporter.

6.2.4 It may be that the reporter does not wish their complaint to be treated in confidence. This issue will also be matter for discussion with the manager when noting the concern.

6.3 **Option Three**

6.3.1 For Authority staff working within SPA Corporate and Forensic Services concerns can be raised directly with the Chair of the People Committee.

6.4 **Option Four**

6.4.1 This guidance has been developed to empower individuals to raise concerns safely and openly using internal routes.

6.4.2 However, there may be times where the reporter feels none of the above options would be suitable for raising their concern. In such circumstances it is possible to raise a concern with another body.

6.4.3 In order to retain the protections offered under the [Public Interest Disclosure Act \(1998\)](#), reporters who wish to report their concerns externally should do so only to one of the organisations prescribed within that legislation.

6.4.4 A full list of prescribed persons and bodies is contained at Appendix 'E' - 'Public Interest Disclosure Act (1998) Prescribed Persons' of this guidance and at [Blowing the whistle: list of prescribed people and bodies \(Scottish Government\)](#).

7. **Confidential Reporting Mechanisms**

7.1 The purpose of [Public Interest Disclosure Act \(1998\)](#) is to encourage the raising of concerns in the public interest.

7.2 SPA welcomes and recognises the value of anonymous disclosure but there may be limitations for the outcomes; these include the following:

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- Detailed investigations may be more difficult, or even impossible, to progress if the individual raising the concern cannot be contacted for further information
- The information provided may not easily be understood and may need clarification or further explanation
- There is a chance that information provided may reveal the identity of the individual raising the concern in any event
- Similarly, where a matter has been reported confidentially for the reasons set out in paragraph 5.1 above, it may not be possible to ensure the reporter's details remain confidential throughout any investigation.

7.3 However in recognition that some individuals may prefer to raise concerns in a manner other than the above, they may do by utilising [Integrity Matters](#). Through this process it is possible to report matters on an open, confidential or anonymous basis.

8. How to Respond if Someone Blows the Whistle

8.1 Managers who receive whistleblowing concerns from individuals should:

- Have a positive and supportive attitude towards the person
- Record as much detail as possible about the concern being raised and verify the content of the concern with the individual raising it
- Be aware of the process following the raising of a concern and explain this to the individual
- Make sure the individual raising the concern knows what to expect, for example in relation to feedback on it
- Inform them that their confidentiality will be protected as far as possible, if they request this; Section 5 - Assurances above refers to this
- Make no promises and manage the expectations of the individual raising the concern
- Make clear that SPA will not tolerate harassment of anyone raising a whistleblowing concern and ask them to let you know if this happens
- Refer the individual raising the concern to available sources of support, for example their Staff Association or Trade Union
- Pass the information as quickly as possible to senior management so that the appropriate procedures for consideration and investigation of the concern can be initiated
- Complete in as much detail as possible, the [Whistleblowing Report Form 006-001](#). These reports will be retained for the appropriate period as set out in the [Record Retention SOP](#).

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- 8.2 It is important that all concerns are properly recorded to ensure that investigations are properly managed and learning is shared appropriately across SPA.
- 8.3 The SPA Complaints and Conduct Team record and assess all incoming reports from authority staff including those submitted via [Integrity Matters](#) and consider where and how they should be investigated.
- 8.4 In order to maintain a single database in relation to whistleblowing, the SPA Complaints and Conduct Team will also be responsible for recording details of all whistleblowing concerns raised by authority staff including those that have been resolved locally at the point of intimation.

9. How Whistleblowing Concerns Will be Dealt With

- 9.1 All concerns raised will be taken seriously. However, it may not be necessary to carry out a formal investigation in each case. There are a range of possibilities depending on the nature of each case, for example:
- Explaining the context of an issue to the individual raising a concern may be enough to alleviate their concerns
 - Minor concerns might be dealt with straight away by line management
 - Should the matter be resolved, as described in the above sections, the circumstances should still be reported to the SPA Complaints and Conduct Team (SPA) by the recipient of the claim as described at paragraph 8.4.
 - There may however be a clear need for a formal investigation
- 9.2 Regardless of how the matter is dealt with, provided it has not been raised anonymously, the individual raising the concern will be advised of who is dealing with the matter and how they can be contacted. They will also be offered the opportunity of a meeting to fully discuss the issue.
- 9.3 It is important that the concern be investigated and resolved timeously. To that end, timescales for investigation should be set and agreed by the reporter and line manager. These should be realistic and achievable. It is important to note they must be subject to review should the needs of the particular issue dictate.
- 9.4 Reporters will be contacted in writing by the person investigating their concerns, summarising the complaint and setting out proposals to handle it.
- 9.5 The individual raising the concern will be provided with as much feedback as possible.
- 9.6 Ideally, expectations regarding timescales for updates and methods of communication will be agreed between the person raising the concern and the individual it is being reported to. It is important to note that these may change in light to any investigation. In which case, the member of staff investigating the concern will be responsible for updating the reporter regarding timescales.

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- 9.7 There may be occasions however where it is not possible to provide precise details of action taken, for example, where it would infringe a duty of confidence owed to another party or where it could prejudice an investigation or other proceedings.
- 9.8 Such matters should be dealt with sensitively and with as much openness as possible.
- 9.9 All concerns raised must be notified to the SPA Complaints and Conduct Team so that they are carefully recorded and monitored, and to enable reports to be made to the SPA Chief Executive Officer in a timely manner.

10. Strategic Oversight

- 10.1 It is important that there is executive oversight of whistleblowing.
- 10.2 To that end, the Director of Governance and Assurance who will report to the SPA Chief Executive Officer on a quarterly basis. The SPA Chief Executive Officer will be responsible for ensuring that all issues of whistleblowing raised within the SPA have been dealt with timeously and that the learning achieved from such reports has been shared across SPA.
- 10.3 Where issues of confidentiality allow, and in the interests of transparency, members of the Staff Associations and Trades Unions will be invited to attend any review meetings.

11. Independent Advice

- 11.1 If an individual is unsure whether or how to raise a concern, or they want confidential advice at any stage, they may contact their Trade Union, Staff Association or the [EAP](#). Individuals may also contact the independent charity [Public Concern at Work](#) on 020 7404 6609 or by email at helpline@pcaw.co.uk. [Public Concern at Work](#), staff will talk through options and help individuals raise their concerns about malpractice at work.
- 11.2 In addition, individuals may wish to contact [ACAS](#) or the [Citizens Advice Scotland](#) who offer specific advice relating to whistleblowing.

12. External Disclosures

- 12.1 As noted at paragraph 6.4 above, there may be instances where a complainer may feel it appropriate to make raise a concern with an external person.
- 12.2 The persons recognised within the [Public Interest Disclosure Act \(1998\)](#) are contained at Appendix 'E' - 'Public Interest Disclosure Act (1998) Prescribed Persons'.

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- 12.3 Reporting a concern to one of these ‘prescribed persons’ affords the reporter all the protections set out in the legislation.
- 12.4 It is important to remember such protections are not applicable to reporters who report matters to people or bodies not listed within Appendix ‘E’ - ‘Public Interest Disclosure Act (1998) Prescribed Persons’, such as media outlets.
- 12.5 In addition, the opportunity exists for authority staff to report issues directly to the Scottish Government where they believe that the response does not represent a reasonable response from the SPA, to the grounds of their concern.
- 12.6 In that case individuals may then report the matter in writing to a nominated official in the Scottish Government Sponsor Team at the following email address; police_policy_strategy_support_team@scotland.gsi.gov.uk.

13. Malicious Reports

- 13.1 SPA actively encourages the reporting of wrongdoing and recognises that the vast majority of individuals making concerns do so out of a desire to ‘do the right thing’ for the organisation.
- 13.2 However where it appears that a report has been made maliciously this will be investigated.

14. The Reporting Process

- 14.1 The diagram in Appendix ‘F’ – ‘Options for Reporting Concerns’ outlines four options for raising a concern within SPA. This is offered as guidance only as it may be the case that complainers might move directly to option two, three or four depending on the circumstance of the particular concern.
- 14.2 It should also be noted that all complaints must be reported by the relevant manager to SPA Complaints and Conduct Team (SPA).

List of Associated Legislation

- [Public Interest Disclosure Act \(1998\)](#)

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List of Associated Reference Documents

Standard Operating Procedures

- [Complaints about the Police SOP](#)
- [Disciplinary SOP](#)
- [Equality Diversity and Dignity SOP](#)
- [Government Protective Marking Scheme \(GPMS\) SOP](#)
- [Grievance SOP](#)
- [Information Security SOP](#)
- [Record Retention SOP](#)

Guidance

- [ACAS](#)
- [Blowing the whistle: list of prescribed people and bodies \(Scot Gov\)](#)
- [Citizens Advice Scotland](#)
- [Employee Assistance Programme](#)
- [Integrity Matters](#)
- [Public Concern at Work](#)

List of Associated Forms

- Whistleblowing Report Form 006-001

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Contact Details

Public Concern at Work

- Tel: 020 7404 6609
- Email: helpline@pcaw.co.uk

Scottish Government Sponsor Team

- Email: police_policy_strategy_support_team@scotland.gsi.gov.uk

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Public Interest Disclosure Act (1998) Prescribed Persons

The Chief Executive of the Scottish Criminal Cases Review Commission about actual or potential miscarriages of justice in Scotland.

- Scottish Criminal Cases Review Commission
5th Floor, Portland House 1
7 Renfield Street
Glasgow
G2 5AH
- Tel: 0141 270 7030; Fax: 0141 270 7040
- Email: info@sccrc.org.uk
- Website: www.sccrc.org.uk

Accounts Commission for Scotland about the proper conduct of public business, value for money, fraud and corruption in local government bodies in Scotland.

- The Secretary to the Accounts Commission Accounts Commission for Scotland
102 West Port
Edinburgh
EH3 9DN
- Tel: 0131 625 1500
- Email: correspondence@audit-scotland.gov.uk
- Website: www.audit-scotland.gov.uk

The Auditor General for Scotland about the proper conduct of public businesses in Scotland, including value for money, fraud and corruption in relation to the provision of public services in Scotland.

- The Auditor General for Scotland Audit Scotland
102 West Port
Edinburgh
EH3 9DN
- Tel: 0131 625 1500
- Email: correspondence@audit-scotland.gov.uk
- Website: www.audit-scotland.gov.uk

Audit Scotland about the proper conduct of public businesses in Scotland, including value for money, fraud and corruption in public bodies in Scotland.

- The Chief Operating Officer Audit Scotland

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102 West Port
Edinburgh
EH3 9DN

- Tel: 0131 625 1500
- Email: correspondence@audit-scotland.gov.uk
- Website: www.audit-scotland.gov.uk

Commissioner for Ethical Standards in Public Life in Scotland about breaches by a councillor or a member of a devolved public body of the code of conduct applicable to that councillor or member in Scotland.

- Commissioner for Ethical Standards in Public Life in Scotland
Thistle House
91 Haymarket Terrace
Edinburgh
EH12 5HE
- Tel: 0300 011 0550
- Email: investigations@ethicalstandards.org.uk

The Lord Advocate, Scotland about serious or complex fraud in Scotland.

- The Head of the Serious and Organised Crime Division
Crown Office
25 Chambers Street
Edinburgh
EH1 1LA
- Tel: 08445 614061
- Email: SOCDADMINEast@copfs.gsi.gov.uk

The Scottish Information Commissioner about compliance with the requirement of legislation relating to freedom of information in Scotland.

- Office of the Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
KY16 9DS
- Tel: 01344 464610
- Email: enquiries@itspublicknowledge.info
- Website: www.itspublicknowledge.info

The Scottish Environment Protection Agency about acts or omissions which have an actual or potential effect on the environment or the management or regulation of

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the environment, including those relating to flood warning systems and systems and pollution in Scotland.

- Customer Service Scottish Environment Protection Agency
Erskine Court Castle Business Park
Stirling
FK9 4TR
- Tel: 08456 124 124
- Email: CustomerServices@sepa.org.uk
- Website: www.sepa.org.uk

The Health and Safety Executive about matters relating to those industries and work activities for which the Health and Safety Executive is the enforcing authority under the [Health and Safety \(Enforcing Authority\) Regulations \(1998\)](#) and which are about the health and safety of individuals at work, or the health and safety of the public arising out of or in connection with the activities of persons at work.

- Health and Safety Executive
- Tel: 0300 003 1647
- Online form: <http://www.hse.gov.uk/contact/raising-your-concern.htm>
- Website: www.hse.gov.uk

Revenue Scotland about the administration of the devolved taxes in Scotland, (Land and Buildings Transaction Tax, and Scottish Landfill Tax)

- Revenue Scotland
Victoria Quay
Edinburgh,
EH6 6QQ
- Email: info@revenue.scot
- Website: www.revenue.scot

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Options for Reporting Concerns (Authority Staff working for SPA Corporate and Forensic Services)

Option One

If you have a concern, raise it first with your manager.

This can be done verbally or in writing.

Option Two

If you feel unable to raise the matter with your manager, for whatever reason, raise the matter with any of the following:

- A Director/Head of Function
- The Chief Executive Officer
- Report your concern via [Integrity Matters](#)

Option Three

If these options have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of those listed above, you can contact the Chair of the People Committee.

Option Four

Should you feel that the matter you are concerned about is so serious it cannot be discussed with anyone within policing then there is an opportunity to raise the matter directly with one of the 'prescribed persons' set out in Appendix 'E' of this guidance.

Alternatively, if you are a member of police staff, you have the opportunity to report your concerns directly to [Scottish Government Sponsor Team](#).

NOT PROTECTIVELY MARKED