



Meeting	Audit, Risk and Assurance Committee
Date	14 August 2025
Location	Online
Title of Paper	Police Scotland Annual Whistleblowing Report
Presented By	ACC Lynn Ratcliff
Recommendation to Members	For Discussion
Appendix Attached	No

PURPOSE

The purpose of this paper is to provide an update in relation to Police Scotland's Whistleblowing data for Financial Year 2024/25 and planned next steps for Year 2025/26.

1 BACKGROUND

- 1.1. Police Scotland commenced a formal 'Whistleblowing' process in 2017 which is now a well embedded process within the organisation. Police Scotland continues to utilise the services of PROTECT (Whistleblowing Advice) Ltd to provide independent, confidential and expert advice to Police Scotland officers, staff and managers.
- 1.2. This report will provide an update in relation to 'Whistleblowing' matters investigated by Police Scotland during the Financial Year 2024/25 and proposed next steps for 2025/26.

2 REPORTING WRONGDOING (WHISTLEBLOWING)

- 2.1 Police Scotland is committed to creating and supporting an open, transparent and safe working environment where officers and members of staff feel able and supported to speak up. All officers and staff are encouraged to report concerns they may have about potential wrongdoing at the earliest opportunity. A variety of options are available for individuals to make a report, including:

- Directly to their line manager;
- Directly to Professional Standards Department (PSD);
- Submitting the online 'Whistleblowing' Reporting Form;
- Via Police Scotland's online confidential reporting mechanism;
- Via Crimestoppers; or
- Via the Police Anti-Corruption and Abuse Reporting Service

3 PSD NATIONAL GATEWAY ASSESSMENT UNIT (NGAU)

- 3.1 National Gateway Assessment Unit (NGAU) provides the single point of contact for all referrals submitted by local policing divisions and departments within Police Scotland regarding any issues involving on or off-duty criminality and/or the conduct or professional behaviour of serving police officers or members of police staff.
- 3.2 Between 01 April 2024 and 31 March 2025, PSD NGAU received **3,610** referrals in total. A breakdown of these referrals is as follows:

Gateway Category	Number	%
ABUSE OF AUTHORITY	14	0.39%
AUDIT REQUEST	77	2.13%
BUSINESS INTEREST	663	18.37%
CONDITIONAL POSTING	24	0.66%

OFFICIAL

CONTROLLED DRUG USE AND SUPPLY	56	1.55%
DISCLOSURE OF INFORMATION	148	4.10%
EXPLOITATION OF THE PRIVILEGE OF OFFICE	3	0.08%
GRIEVANCE RELATED MATTER	82	2.27%
INAPPROPRIATE ASSOCIATION	48	1.33%
INAPPROPRIATE SOCIAL MEDIA	31	0.86%
MISUSE OF FORCE SYSTEMS	39	1.08%
NOTIFIABLE ASSOCIATION	782	21.66%
ORGANISATIONAL RISK	499	13.82%
OTHER	19	0.53%
OTHER CRIMINAL BEHAVIOUR	328	9.09%
PERFORMANCE	475	13.16%
PERVERTING THE COURSE OF JUSTICE	3	0.08%
PUBLIC SECTOR	2	0.06%
SEXUAL MISCONDUCT	30	0.83%
SOCIAL MEDIA CAPTURE	2	0.06%
THEFT AND FRAUD	19	0.53%
VULNERABILITY	266	7.37%
Grand Total	3610	100.00%

3.3 Upon receipt, PSD NGAU officers record and triage all referrals, carry out background checks and depending on the initial assessment, allocate the referral to the relevant local policing division, department, the Professional Standards Department (PSD) or the Anti-Corruption Unit (ACU) for further action.

3.4 As a general rule, matters relating to on-duty criminality, corruption or misconduct will be allocated within PSD or ACU for progression and matters relating to off-duty criminality, local issues, workplace practices or behaviours will be reverted to the most appropriate Division for consideration and progression. In addition, People and Development will also be involved should matters relate to members of police staff.

3.5 The outcome of the aforementioned referrals is as follows:

Outcome of Enquiry	Number	%
ACU referral	240	6.65%
Advice & Guidance	14	0.39%
Allegation Disproved	19	0.53%
Allegation Malicious	7	0.19%
Allegation Not Substantiated	183	5.07%
Business Interest	616	17.06%

Conditional Posting	12	0.33%
Info only - noted iBase	447	12.38%
Memo to Division	508	14.07%
Notifiable Association Sec 4 complete & returned to Division	680	18.84%
Ongoing	254	7.04%
Other - specify in NOTES	165	4.57%
Performance - Memo to Division	45	1.25%
PSD - Complaints	88	2.44%
PSD - Conduct	161	4.46%
PSD - Investigations	140	3.88%
PSD - SI Team Enquiry	31	0.86%
Grand Total	3610	100.00%

- 3.6 PSD NGAU officers will also consider whether any reports meet the legislative criteria as outlined within the Public Interest Disclosure Act (PIDA) 1998 and formally record these on PSD systems as 'Whistleblowing'.

4 PROTECTED DISCLOSURES

- 4.1 Police Scotland's priority is to address the concern that has been raised and to allocate the matter for investigation to the most appropriate business area for consideration and progression.
- 4.2 Furthermore, the service is committed to supporting anyone who has raised a concern of wrongdoing and will not tolerate their harassment or victimisation. This is highlighted to the receiving Division/Department upon allocation.
- 4.3 Upon receipt of the report or referral, PSD NGAU will also consider whether the matter has been witnessed at work and whether the individual making the report held a reasonable belief that:
- They were acting in the public interest and;
 - That the disclosure tended to show past, present or likely future wrongdoing falling into one or more of the following categories:
 1. A criminal offence has been, is being or is likely to be committed;
 2. A person has failed, is failing or is likely to fail to comply with any legal obligation;
 3. A miscarriage of justice has occurred, is occurring or likely to occur;

4. The Health or Safety of an individual has been, is being, or is likely to be endangered;
5. The environment has been, is being or is likely to be damaged;
6. There has been deliberate concealment of information in relation to any of the above.

- 4.4 These specific cases are identifiable on PSD Systems under 'Whistleblowing' to provide early notification that the individuals making these reports may be entitled to seek redress through an Employment Tribunal if they consider that they have suffered detriment as a result of making their report.
- 4.5 Between 01 April 2024 and 31 March 2025, PSD NGAU recorded **38** matters on PSD systems which were assessed to be 'protected disclosures' as per PIDA legislation with **25** of these reports being made anonymously.
- 4.6 Since the creation of PSD NGAU in February 2017, the following referrals have been assessed to relate to 'protected disclosures' as per PIDA 1988:

Year	Total No. of Referrals Received by PSD NGAU	Total No. of Referrals Recognised (in Full or Part) as Whistleblowing
2017/18	1175	1*
2018/19	2168	4*
2019/20	2419	13*
2020/21	2743	7*
2021/22	2720	13*
2022/23	3084	15*
2023/24	3,174	25*
2024/25	3,610	38*

** These include anonymous reports that are reasonably assessed to be 'protected disclosures' as per PIDA 1998*

- 4.7 During the Year 2024/25, Police Scotland has enhanced current Whistleblowing processes, operations and governance, as follows:
- Discussions are underway to review Police Scotland's contract with PROTECT to provide independent advice to officers, staff and managers with regards to 'Reporting Wrongdoing (Whistleblowing)';
 - PROTECT continues to deliver training to officers within Professional Standards and provide the opportunity to attend webinars and seminars to ensure continuous professional development;

- Police Scotland observed 'World Whistleblower Day' on 23 June 2025 and published internal communications to encourage and support reporting within the organisation;
- Professional Standards continues to hold bi-monthly meetings with Divisional Support Superintendents to maintain oversight of matters allocated to them by PSD NGAU and to discuss ongoing enquiries, including matters assessed to be 'protected disclosures' as per PIDA 1998;
- PSD continue to schedule engagement sessions with Divisional Sergeants and Inspectors concentrating on different topics - Recently these featured the role of PSD National Gateway Assessment Unit (NGAU) and included reporting wrongdoing and protected disclosures;
- The formal consultation in relation to the 'Reporting Wrongdoing (Whistleblowing)' Guidance and Policy has now been completed and the revised Guidance has been submitted for Executive sign off. A review of the existing Moodle Training Package is underway to ensure consistency of terminology and, once completed, national communications will be delivered to raise awareness and encourage reporting;
- PSD continues to support the Chief Constable's 2030 Vision to provide safer communities, less crime, supported victims and a thriving workforce and is also fully engaged in Police Scotland's 'Policing Together Strategy', supporting the service-wide drive to raise awareness of the organisation's values of integrity, fairness and respect, and a commitment to upholding human rights. Examples of this include the publication of misconduct outcomes and the ongoing Preventions Programme focusing on our Standards of Professional Behaviour, encouraging officers and members of police staff to challenge and report inappropriate behaviours.

5 NEXT STEPS 2025/26

5.1 In order to develop and strengthen current process and practice, Police Scotland's next steps for Year 2025/26 will be as follows:-

- The Police Scotland 'Reporting Wrongdoing (Whistleblowing)' Guidance and associated Policy will be published and supported by a robust internal Communications Strategy;
- The existing moodle training package on Reporting Wrongdoing (Whistleblowing) will be re-launched and supported by internal comms to encourage completion. This will include reference to the updated guidance on the relevant edition of 'The Standard' newsletter.

- The Head of PSD / broader PSD SMT will continue to engage with Staff Associations and key stakeholders to enable early identification of any issues and promote training and awareness;
- Internal PSD workshops to raise awareness and understanding, with involvement of other key internal departments, such as HR.
- Introduction of enhanced ways of reporting concerns and wrongdoing (externally managed reporting line is likely to be introduced in July 2025), which is aimed to increase confidence in reporting and as such may result in more protected disclosure matters being raised.

6 FINANCIAL IMPLICATIONS

- 6.1. There are no direct financial implications at this time however costs will be fully explored during the formal procurement phase towards the end of the current contract with Protect.
- 6.2. Police Scotland strives to create a transparent culture within the organisation in line with our Values of Fairness, Integrity, Respect and Human Rights, to minimise potential legal costs attributed to wrongdoing within the workplace.

7 PERSONNEL IMPLICATIONS

- 7.1. Police Scotland's policy seeks to ensure staff and officers feel enabled, empowered and supported to report wrongdoing. Our officers and staff can be reassured that all reports of wrongdoing will be taken seriously and thoroughly investigated, whilst affording employees legislative protection.

8 LEGAL IMPLICATIONS

- 8.1. Processes put in place will ensure Police Scotland's compliance with the Employments Rights Act 1996 and the Public Interest Disclosure Act 1998.

9 REPUTATIONAL IMPLICATIONS

- 9.1. In 2019 Police Scotland was recognised as a benchmark for other law enforcement agencies by the UK Government call for evidence into Whistleblowing. We endeavour to develop and strengthen our process, to have a workforce that is listened to, feel empowered to report wrongdoing and create a safe working environment/culture.

This, in turn, will build public trust and confidence in policing, as these matters are in the public interest.

10 SOCIAL IMPLICATIONS

10.1. By strengthening existing process, we will create an open, honest and transparent culture which meets the needs and encompasses our full workforce and the wider communities we serve.

11 COMMUNITY IMPACT

11.1. A strong 'Reporting Wrongdoing (Whistleblowing)' process within the organisation will enhance public trust and confidence in Policing.

12 EQUALITIES IMPLICATIONS

12.1. There are no equality implications in this report.

13 ENVIRONMENT IMPLICATIONS

13.1. There are no environmental implications in this report.

RECOMMENDATIONS

Members are invited to note the information contained within this report.