



<b>Meeting</b>	<b>SPA Audit, Risk and Assurance Committee</b>
<b>Date</b>	<b>14 August 2025</b>
<b>Location</b>	<b>Online</b>
<b>Title of Paper</b>	<b>SPA Annual Whistleblowing Report</b>
<b>Presented By</b>	<b>John McNellis, Head of Finance, Audit and Risk</b>
<b>Recommendation to Members</b>	<b>For Discussion</b>
<b>Appendix Attached</b>	<b>No</b>

## PURPOSE

The purpose of this paper is to provide an annual update and assessment on the effectiveness of whistleblowing arrangements within the Scottish Police Authority (SPA).

## 1 BACKGROUND

- 1.1. The SPA Whistleblowing Policy outlines the requirement to provide an annual update to the Audit, Risk and Assurance Committee with a particular focus on concluded whistleblowing cases and lessons learned as a result.
- 1.2. This annual update goes beyond the specific policy commitment with further information to ensure a full and rounded assessment of the effectiveness of whistleblowing arrangements.

## 2 POLICY ASSURANCE PROCESS

- 2.1 There are a number of routes available to raise a whistleblowing concern under the [SPA Whistleblowing Policy](#), each of which entail notification to the SPA Complaints & Conduct team for recording (and, in specific circumstances, coordinating investigation). There have been **no notifications of Whistleblowing disclosures during 2024/25**, with any matters raised prior to 2024/25 having been concluded prior to the reporting period.
- 2.2 Ordinarily, a six-monthly SPA assurance process is in place ensuring the SPA Chief Executive, Director of Forensic Services and SPA Whistleblowing Champion (SPA Board Member) receive an update of the effectiveness of the policy against criteria set out below. However, in the absence of any cases during the reporting period, no assessment is provided.

Policy Requirements
The number of whistleblowing concerns that are outstanding, how they are being dealt with and for how long they have been outstanding.
The number of whistleblowing concerns that have been closed, along with the outcome, lessons learned, and improvements made as a result of the concern being raised.
The extent to which procedures used are adequate to track the actions taken and in ensuring appropriate follow-up action has been taken to investigate and, if necessary, resolve.
The extent to which whistleblowers are being effectively provided with updates and feedback.
The extent to which there have been any difficulties with confidentiality.
The extent to which there have been any concerns in relation to fair treatment.
The extent to which issues raised could have been resolved earlier before the concern was raised.
Any relevant views from the whistleblower and/or trade unions on the current whistleblowing policy.

### 3 POLICY/PRACTICE SELF-ASSESSMENT

- 3.1 Previous assurance reports have confirmed that the whistleblowing policy/practice strongly aligns with ISO 37002, the whistleblowing management system standard published in July 2021. SPA's approach to whistleblowing is particularly strong in relation to the content of the policy and the supporting governance process that includes a regular assurance report to the SPA Chief Executive, Director of Forensic Services and the SPA Whistleblowing Champion. This is also supported by an annual update on the effectiveness of arrangements to the Audit, Risk and Assurance Committee.
- 3.2 In the spirit of continuous improvement areas for potential development have been identified linked to the ISO standard.

Areas for Development	Status
Consider explicit inclusion of specific intended whistleblowing outcomes that can then be considered as part of the assurance process.	Draft update developed however policy yet to be progressed for consultation during 2025/26.
Consider the need for there to be scope to offer different levels of support based on case-by-case assessment of risk of detriment.	
Consider need for specific reference to the fact that criminal allegations also require to be reported to Police Scotland.	
Ensure engagement with Information Management as part of policy review (considering detail of ISO guidance) to determine extent to which policy should be more specific in relation to data protection, retention and confidentiality.	Will form part of upcoming consultation process during 2025/26.
Ensure accessibility assessment forms part of policy review.	When any EqHRIA is understand this will be considered .

### 4 TRAINING PLAN

- 4.1 Specific training was developed and implemented for the SPA Complaints & Conduct team in line with their responsibilities in relation to quality assurance relating to assessment of:
- Concerns raised which do not reference whistleblowing but actually meet the legal definition.
  - Concerns raised which reference whistleblowing but actually meet the legal definition.

- 4.2 An e-learning package was developed and implemented for all staff in SPA Corporate and Forensic Services.
- 4.3 As of 17 July 2025, 44 (96%) of SPA Corporate staff and 455 (73%) of SPA Forensic Services staff had completed the training.

## 5 MEASUREMENT OF KNOWLEDGE AND CONFIDENCE RELATED TO WHISTLEBLOWING

### SPA Corporate

- 5.1 In previous years SPA corporate have measured understanding and confidence levels related to SPA Corporate, and the results are outlined below.

	<b>I understand what constitutes a whistleblowing concern and how to bring this to the attention of the organisation</b>				<b>If I had a whistleblowing concern, I am confident to raise this</b>		
	<b>2022</b>	<b>2023</b>	<b>2024</b>		<b>2022</b>	<b>2023</b>	<b>2024</b>
Agree	95.4%	84.1%	94.7%		84.0%	79.6%	84.2%

- 5.2 Whilst not being complacent about the need to always work to embed a culture that encourages individuals to raise concerns it is positive to note that results have improved in terms of knowledge and confidence levels.

### Your Voice Matters

- 5.3 Previous updates have confirmed that there is a focus in ensuring the staff survey for all officers/staff in policing includes appropriate questions that would allow for the confidence to raise concerns to be measured going forward beyond SPA Corporate only.
- 5.4 Your Voice Matters was launched on 1 July 2024, seeking views on the statement "Our organisation creates a safe environment and support systems for colleagues to raise concerns". Acknowledging that this statement is not specific to whistleblowing concerns, 79% of SPA Corporate staff, and 43% of SPA Forensics staff agreed with the statement.

- 5.5 A further survey launched on 4 August 2025 with results due to be available towards the end of the calendar year.

## 6 ASSESSMENT OF EFFECTIVENESS

- 6.1 This assessment considers the policy and practice, based on the detail above.

### Policy

- Policy very clear in relation to benefits of raising concerns and encourages individuals to raise concerns.
- Policy was developed in line good practice and has been subject to self-assessment with conclusion re alignment to the Whistleblowing Commission Code of Practice and ISO Standards.
- Evidence that lessons learned in practice will continue to inform policy development.

### Practice

- Self-assessments demonstrate alignment with good practice.
- Steps have been and are being taken to make improvements based on lessons learned from previous cases and consideration of ISO standards.

### Training and Awareness

- Current Policy easily accessible.
- Training package in place.
- Improved capability and quality assurance process that identifies whether a concern does or doesn't meet whistleblowing definition irrespective of whether it formally comes through whistleblowing channels.

### Staff Confidence

- Earlier survey results for SPA Corporate demonstrate high levels of confidence to raise concerns and high levels of knowledge in the process.
- Your Voice Matters survey has appropriate question to ensure measuring of confidence to raise concerns for whole of policing going forward.

- 6.2 In summary the current SPA whistleblowing arrangements are considered effective. Further improvements will be considered over 2025/26.

## **7 FINANCIAL IMPLICATIONS**

- 7.1 There are no direct financial implications. However, an open and transparent culture will help to mitigate the associated costs of malpractice and poor financial decision making.

## **8 PERSONNEL IMPLICATIONS**

- 8.1 The Authority approach to whistleblowing seeks to ensure that staff work in an open, transparent and safe working environment where people feel able to speak up.

## **9 LEGAL IMPLICATIONS**

- 9.1 The policy seeks to ensure internal controls and processes are in place to enable SPA compliance with the relevant legislation. The work in relation to the implementation of the training plan seeks to build on this.

## **10 REPUTATIONAL IMPLICATIONS**

- 10.1 An effective approach to whistleblowing is essential in detecting and deterring wrongdoing, whilst also raising the bar on standards and quality. The reputational benefit of having an open, transparent and safe working environment is clear.

## **11 SOCIAL IMPLICATIONS**

- 11.1 There are no social implications in this report.

## **12 COMMUNITY IMPACT**

- 12.1 There are no community implications in this report.

## **13 EQUALITIES IMPLICATIONS**

- 13.1 Policy developments being considered are being supported by an Equality and Human Rights Impact assessment to ensure mitigation of negative impact whilst ensuring opportunities are taken to maximise positive impact.

## **14 ENVIRONMENT IMPLICATIONS**

- 14.1 A specific category for raising whistleblowing concerns relates to damage to the environment. No issues have yet been identified through the updated whistleblowing policy.

### **RECOMMENDATIONS**

Members are requested to discuss the report.