



Regulatory Committee:	Audit & Governance Committee
Date:	25 April 2024
Report Title:	Annual Review of Whistleblowing Policy
Chair:	Cllr John Bloxsom
Presenting Officer:	Rob Ayliffe, Monitoring Officer
Item Type:	For information
Purpose of Report:	To review activity under the Council's Whistleblowing Policy to ensure that it is operating effectively
Recommendations or Actions Sought:	That Audit and Governance Committee: <ul style="list-style-type: none">• notes the information provided in this report• confirms that no changes are needed to the Council's Whistleblowing Policy• supports the development priorities identified for 2024
Background Documents:	Gloucestershire County Council Whistleblowing Procedure
Forthcoming Decisions:	Not applicable
Appendices:	Summary of Whistleblowing Cases: Jan – Dec 2023 (Exempt)
Contact Information (For information on the report)	Rob Ayliffe, Monitoring Officer Tel: 01452 328506 Email: rob.ayliffe@gloucestershire.gov.uk

Introduction

1. The Council's Whistleblowing Policy was introduced in its current form in 2017. It applies to all of the Council's workforce, including those who are employed by external agencies from whom the Council contracts services. It sets out the arrangements by which employees can raise concerns about something which **affects other people** including issues of health and safety, fraud, corruption, malpractice or maladministration. It is incorporated into the Employee Code of Conduct and the Council's Constitution.
2. The policy follows best practice, and is informed by advice and guidance from Protect – an independent Whistleblowing charity with whom GCC maintains a subscription through which staff can access advice, support and training.
3. The whistleblowing policy allows concerns to be raised at 3 levels:
 - Level 1 - In the first instance, employees are encouraged to raise concerns with their line manager or team leader
 - Level 2 - If they feel unable to do this, they can raise the matter with any of the following: their Head of Service, Assistant Director, Director or Executive Director; the Chief Internal Auditor; Human Resources; the Assistant Director of Legal Services; or (in the case of schools) the Director of Education.
 - Level 3 - If concerns remain unaddressed, or are so serious that the individual does not want to discuss them with any of the above, they can be raised directly with the Monitoring Officer.
4. Whistleblowing concerns can be raised face-to-face, by email or anonymously via a form on the Council's website.
5. The Monitoring Officer has overall responsibility for the Whistleblowing policy and its implementation. Whistleblowing activity is reported to, reviewed and analysed on a monthly basis by Statutory Officers to ensure that cases are progressing and being managed appropriately, and to identify emerging patterns and concerns. This Committee has responsibility for reviewing the policy and its operation annually.
6. During 2022, a Whistleblowing Steering Group was established, chaired by the Monitoring Officer and comprising officers from Legal Services, Complaints and Governance, Education, Audit (Counter Fraud) and Human Resources. This group has continued to meet every few months.
7. As the policy appears to be operating as intended, no amendments are recommended for the coming year.

Whistleblowing concerns raised during 2023

8. The appendix to this report provides a summary of whistleblowing concerns raised during 2023 and the outcome of any subsequent action taken.
9. In all 17 concerns were raised. This is the same number of concerns as were received during 2022. Of those
 - seven were found to be unfounded – there was sufficient evidence to disprove the concern;
 - four were investigated and identified minor failures or opportunities to improve – improvements were subsequently put in place
 - one was investigated and found irregularities in the way a council procedure had been followed – appropriate management action has been taken
 - in one case there was insufficient evidence to follow up the concern as the report was made anonymously and provided insufficient information;
 - three related to matters outside GCC’s jurisdiction, and were referred to the appropriate body;
 - one concern is still being investigated – the outcome is awaited.
10. The majority of concerns continue to be raised anonymously, though in five of these cases, the whistleblower did choose to identify themselves.

Staff survey results

11. The 2023 staff survey results included questions that measured staff confidence in the council’s whistleblowing arrangements. These are shown in the table below.

	Agree/ Strongly agree	Neutral
In the past year have you observed or had any concerns about or experienced wrongdoing, risk or malpractice at work?	9.8%	
If you had a concern about wrongdoing, risk or malpractice at work, would you feel able to raise it with your manager?	89.2%	
I am confident that issues of wrongdoing, risk or malpractice are dealt with appropriately	60.0%	32.5%
Are you aware of the 'Speak out if it's not right' whistleblowing campaign?	77.3%	

12. While we are not complacent, according to advice from Protect, these results benchmark well against similar organisations. Nevertheless, the council is not complacent, and we are discussing results with staff groups to identify opportunities to raise awareness and make further improvements.
13. The high percentage of neutral responses to the question "*I am confident that issues of wrongdoing, risk or malpractice are dealt with appropriately*", suggests that we need to do more to raise awareness of the actions we take when concerns do arise. The limited number of concerns, and the need to protect anonymity makes that difficult, but there is an opportunity to talk (in suitably anonymised terms) where a whistleblowing report has resulted in improvements.
14. We continue to issue regular communications to council staff via a number of channels, as well as using the Annual Governance Statement process to raise awareness amongst council managers of the Whistleblowing arrangements. The staff survey results will enable us to take a more targeted approach amongst those teams where awareness is lowest.

Other changes introduced during 2023

15. During 2023, in light of concerns arising elsewhere in the country, the National Fire Chief Councils asked all fire and rescue services to consider providing an independent whistleblowing line for staff. Although levels of confidence in the Council's arrangements are relatively high in the Fire and Rescue Service (at 83.1%), the council agreed to subscribe to a Whistleblowing service provided by Crimestoppers (and already in use at a number of other Fire and Rescue Authorities). This service is low cost, but allows individuals to raise concerns without passing their details on to the Council. Where further information is needed, this allows Crimestoppers to make enquiries on the Council's behalf without having to disclose the identity of the whistleblower. This is a facility that we cannot replicate internally, so provides the council with added benefit.
16. To date, only two concerns have been raised via this route, but our intention is to review the service after a year, and consider whether there is any merit in extending it more widely across GCC.

ENDS