

WHISTLEBLOWING POLICY

1. INTRODUCTION

1.1 Employees are often the first to realise that there may be something seriously wrong within Glasgow Life. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to Glasgow Life. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2 Glasgow Life is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, Glasgow Life expects employees and others with serious concerns about any aspect of Glasgow Life's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that staff can do so without fear of reprisals. This Whistleblowing Policy is intended to encourage and enable staff to raise serious concerns within Glasgow Life rather than overlooking a problem or 'blowing the whistle' to the media or other external bodies.

1.3 This policy has been discussed with the relevant Trade Unions and has their support.

2. AIMS AND SCOPE OF THE POLICY

2.1 This policy aims to:

2.1.1 Provide avenues for staff to raise concerns and receive feedback on any action taken;

2.1.2 Inform staff on how to take the matter further if they are dissatisfied with the response,
and

2.1.3 Reassure staff that they will be protected from reprisals or victimisation for whistleblowing in good faith.

2.2 There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures.

That concern may be about something that is:

2.2.1 Unlawful;

2.2.2 Against Glasgow Life's policies or procedures;

2.2.3 Falls below established standards or practices ;

2.2.4 Amounts to improper conduct.

3. SAFEGUARDS

3.1 Harassment or Victimisation

Glasgow Life recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. Glasgow Life will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith.

This does not mean that if a member of staff is already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

3.2 Confidentiality

Glasgow Life will do its best to protect an individual's identity when they raise a concern and do not wish their name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence.

3.3 Anonymous Allegations

This policy encourages staff to put their names to allegations. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of Glasgow Life. In exercising this discretion, the factors to be taken into account would include:

3.3.1 The seriousness of the issue raised;

3.3.2 The credibility of the concern;

3.3.3 The likelihood of confirming the allegation from attributable sources.

3.4 Untrue Allegations

If staff make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, individuals make malicious or vexatious allegations, disciplinary action may be considered and implemented.

4. RAISING A CONCERN

4.1 For some minor issues (e.g. personal use of Glasgow Life equipment, abuse of flexi-time), staff should normally raise concerns with their immediate manager or other superior. In general, however, the whistleblowing procedure is expected to be used for potentially more serious and sensitive issues (e.g. corruption, fraud) and the first step will be to

approach the relevant Head of Service (unless s/he or senior management is the subject of the complaint in which case a Director or the Chief Executive should be informed). Should the complaint be found by management to be substantiated, s/he will consult with the Chief Executive on appropriate action. Should the Chief Executive be the subject of the complaint this should be raised with the Board.

4.2 Concerns can also be raised by calling the Whistleblowing Hotline. This service is managed by Glasgow City Council Internal Audit Service and can be accessed on 0141 287 3777

4.3 Concerns are better raised in writing. The background and history of the concern, giving names, dates and places where possible, should be set out and the reason why the individual is particularly concerned about the situation. Those who do not feel able to put their concern in writing can telephone or meet an appropriate officer.

4.4 The earlier the concern is expressed, the easier it is to take action.

4.5 Although staff are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for concern.

4.6 Advice and guidance on how matters of concern may be pursued can be obtained from the Chief Executive.

4.7 Individuals may invite their Trade Union or professional association to raise a matter on their behalf.

5. HOW THE COMPLAINT WILL BE DEALT WITH

5.1 The action taken by Glasgow Life will depend on the nature of the concern. The matters raised may:

- 5.1.1 Be investigated internally;
- 5.1.2 Be referred to the Police;
- 5.1.3 Be referred to the external Auditor.

5.2 In order to protect individuals and Glasgow Life, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of other, existing, procedures (e.g. child protection or discrimination issues) will normally be referred for consideration under those procedures.

5.3 Some concerns may be resolved by agreed action without the need for investigation.

5.4 Within ten working days of a concern being received, Glasgow Life will write to the complainant:

- 5.4.1 Acknowledging that the concern has been received;

- 5.4.2 Indicating how it proposes to deal with the matter;
- 5.4.3 Giving an estimate of how long it will take to provide a final response;
- 5.4.4 Telling them whether any initial enquiries have been made;
- 5.4.5 Telling them whether further investigations will take place, and if not, why not.

5.5 The amount of contact between the body considering the issues and the complainant, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the individual.

5.6 When any meeting is arranged, employees have the right, if they so wish, to be accompanied by a Trade Union Representative/Official or employee of their choice.

5.7 Glasgow Life will take steps to minimise any difficulties that employees may experience as a result of raising a concern. For instance, if staff are required to give evidence in criminal or disciplinary proceedings, the Company will advise them about the procedure.

5.8 Glasgow Life accepts that staff need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, staff will receive information about the outcomes of any investigations.

6. ALTERNATIVE METHODS OF TAKING FORWARD A COMPLAINT

6.1 This policy is intended to provide staff with an avenue to raise concerns with Glasgow Life. Glasgow Life hopes this will satisfy staff. If an individual feels it is right to take the matter outside this process, the following are possible contact points:

- 6.1.1 The external Auditor
- 6.1.2 Relevant professional bodies or regulatory organisations
- 6.1.3 Individuals' solicitors
- 6.1.4 The Police

6.2 If staff take the matter outside Glasgow Life, they need to ensure that they do not disclose confidential information or that disclosure would be privileged.

7. THE RESPONSIBLE OFFICER

7.1 The Chief Executive has overall responsibility for the maintenance and operation of this policy. That Officer maintains a record of concerns raised and the outcomes (but in a

form which does not endanger confidentiality) and will report as necessary to the Glasgow Life Board and/or to its Audit Committee.