

18 September 2024

Whistleblowing policy

Executive Summary

The Audit and Risk Assurance Committee (ARAC) has responsibility for the review of the whistleblowing policy and monitoring its operation. The whistleblowing policy is approved by the Council following recommendation by the ARAC. The Chair of the ARAC is also a designated point of contact for employees under the whistleblowing policy.

When the whistleblowing policy was last reviewed it was completely revised to be much shorter and more employee focused, in line with best practice. Since the whistleblowing policy was last updated no internal whistleblowing concerns have been reported. Although this does not necessarily reflect negatively on the policy, it does highlight the need to review the policy to see if it can be improved and increase awareness about how to raise concerns among HCPC employees. The recently published report following an independent review of the culture of the Nursing and Midwifery Council also highlighted the importance of ensuring employees feel comfortable speaking up and the range of routes through which they can do this.

We are planning to continue the evolution of the whistleblowing policy in the latest review and move to a policy that encourages and welcomes speaking up in the broadest sense, which will also be reflected in a change in the name of the policy.

The proposed changes to the policy:

- will bring together the full range of options for speaking up and raising specific concerns and provide details of the various contact points and mechanisms within the HCPC to support employees in speaking up in any way they feel comfortable about any subject, concern or idea;
 - will provide some examples of what can be raised through speaking up, which we can build on through our experiences and other communications and engagement once the new policy is in place;
 - will encourage employees to speak up at the earliest opportunity whether they have evidence for their concerns or not and without the need to set anything out in writing at that stage, recognising that employees may not know whether there is anything wrong;
 - will introduce a speaking up guardian to support those raising concerns through the processes and ensure they are kept updated on the outcome to the extent that this is possible;
 - will include information about protected/qualifying disclosures, without restricting the application of the policy to concerns that meet the criteria for 'whistleblowing'; as this could act as a potential barrier to speaking up; and
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- will continue to reference external support and agencies to which concerns can be escalated.

ARAC members are invited to provide feedback on the approach and their experiences of speaking up policies and processes to inform the review of the HCPC's whistleblowing policy.

Previous consideration	<p>The whistleblowing policy was last reviewed and approved by the Council in December 2020 following a recommendation from the ARAC.</p> <p>A small working group has been established to consider the proposed changes to the whistleblowing policy led by the Executive Director of Resources.</p>
Decision	<p>ARAC members are asked to consider the planned approach for reviewing the whistleblowing policy and provide feedback on the approach and their experiences of speaking up policies and processes to inform the review of the HCPC's whistleblowing policy.</p>
Next steps	<p>Changes to the whistleblowing policy will be subject to review by the Executive Leadership Team and consultation through the Employee Forum. The proposed policy will then be presented to the ARAC for review and recommendation to the Council for approval followed by approval by the Council by the end of 2024.</p>
Strategic priority	<p>Build a resilient, healthy, capable and sustainable organisation.</p>
Financial and resource implications	<p>Adequate time will need to be allocated to any Speaking Up Guardian to perform the role.</p>
EDI impact and Welsh Language Standards	<p>The processes and safeguards set out in the policy will support all employees in raising concerns, including those relating to equality, diversity and inclusion and support an open culture, with positive impacts for all protected groups.</p> <p>As an internal-facing document, we do not consider this engages the Welsh Language Scheme.</p>
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