

# Whistleblowing Policy & Guidance

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## REPORTING WRONGDOING

You can report wrongdoing at or by the GLA using one of the following routes:

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| 1. Your line manager                                    | In the first instance, please speak to your line manager. They will, if your concern is covered by this policy, report it to the Head of Performance and Governance and/or Chief Finance Officer  |
| 2. The Chief Finance Officer                            | Alternatively, you can raise your concern directly with the Chief Finance Officer   |
| 3. The Head of Audit and Assurance                      | The Head of Audit and Assurance is part of our Internal Audit service provided by the Mayor's Office for Policing and Crime   |
| 4. EthicsPoint<br>0800 249 4584 or <a href="#">here</a> | A confidential reporting line, managed by an external firm on our behalf. Note your concern will normally be referred to the Chief Finance Officer and Head of Performance and Governance by them – unless there's a good reason not to |
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## ABOUT THIS DOCUMENT

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# Part A: Whistleblowing Policy

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## 1. Policy statement by the Chief Officer and Chief Finance Officer

1.1 The Greater London Authority (GLA) is committed to the highest standards of conduct. Our governance framework and the tone we set as an organisation are designed to embed processes and foster a corporate culture that promotes these high standards and ensures they are met. In particular, elected Members, staff and those we work closely with are expected to uphold the seven principles of public life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

1.2 Sometimes, however, wrongdoing does happen. And where and when it does, it is important we hear about it, seek to put things right as far as possible, address any weaknesses in systems and processes, and take appropriate action. This document is about the first part of that: ensuring there is a simple, effective and confidential process – that everyone has confidence in – for Members and staff to raise concerns about the way the GLA's activities are being conducted. Integral to that confidence is protecting those staff who do blow the whistle – and that is one of the main aims of this policy. We will treat every reported concern with the utmost care and seriousness.

1.3 In short, we want the GLA to be a place where people feel safe to speak up – particularly as it is our staff who will often be the first to spot any wrongdoing. The corollary of that is we expect our Members and staff to raise any concerns they have about wrongdoing. Acting with integrity and honesty is about more than avoiding wrongdoing. It is about playing an active role in ensuring these values are upheld.

1.4 This Whistleblowing Policy is one element of a wider set of arrangements we have in place to uphold high standards and prevent wrongdoing. In particular, these arrangements also include our Anti-Fraud & Corruption Policy and Anti-Money Laundering Policy. But other parts of our governance framework also frame and direct our approach, including the Code of Conduct for Members, Code of Ethics and Standards for Staff, Mayoral Decision-Making in the GLA, our Standing Orders, Use of Resources Policy, Expenses and Benefits Framework, Register of Interests and associated guidance, Gifts and Hospitality Policy, Financial Regulations and our commitment to transparency.

1.5 This document is both policy and guidance and so it explains the channels available for reporting wrongdoing. Although it is primarily for Members and staff, and covers particular types of wrongdoing (see section 3), we recognise others may wish to report wider concerns to us about our work or conduct. So this document also has something to say about how these concerns can be reported. If you think anything here is unclear or you have any feedback, please get in touch with the Head of Performance and Governance.

## 2. The GLA's whistleblowing commitments and outcomes

2.1 This Whistleblowing Policy explains, formalises and aims to give effect to the following commitments.

2.2 The GLA will:

- a) ensure there is a simple, straightforward route for staff to raise concerns about wrongdoing at the GLA – and set out this process clearly
- b) protect staff who blow the whistle and maintain confidentiality – so those reporting wrongdoing can do so without fear of reprisals or detriment to themselves
- c) treat all reports of wrongdoing fairly and with care – and take each one seriously
- d) promptly review and where appropriate thoroughly investigate reports of wrongdoing – taking action and seeking to put things right
- e) keep its Whistleblowing Policy and associated arrangements under review and update them periodically

2.3 These commitments are underpinned by the protection afforded to whistleblowers under the law (the Public Interest Disclosure Act 1998).

2.4 The GLA expects its Members and staff to act openly and honestly in reporting – proactively – wrongdoing and attempted wrongdoing.

2.5 The outcomes the GLA is seeking from this policy are to:

- a) instil confidence in the GLA's whistleblowing procedures so everyone feels able – and is encouraged to – blow the whistle
- b) and ultimately, to promote confidence more widely in the GLA and its work by ensuring its acts and is seen to act with honesty and integrity

## 3. Scope and definitions

3.1 This policy applies to and the guidance is primarily for Members and employees of the GLA, anyone else working for the GLA in any capacity (for example, temporary agency staff, consultants, secondees and volunteers) and those providing a shared service to the GLA. These people are often generically referred to as 'staff' within this policy and the accompanying guidance.

3.2 Though not the primary focus of this policy, the GLA also encourages external parties to raise any concerns they have about wrongdoing at the GLA (see section 3 of the guidance).

3.3 Whistleblowing refers to the reporting of specific issues in the public interest:

- a criminal offence; for example, fraud or bribery

### Box A: What is a whistleblower?

You're a whistleblower if, as someone who works at the GLA (or who is a Member), you report certain types of wrongdoing. This will usually be something you've seen at the GLA – though not always.

Whistleblowing relates to making disclosures about wrongdoing in the public interest. This means things that affects others; for example, the general public.

As a whistleblower you're protected by this policy and, more importantly, the law. That means you won't suffer a detriment – for example, lose your job or be disadvantaged at work – if you report something.

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future. However, the sooner you raise your concern, the better the chance of addressing it.

- where someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- where the GLA is breaking the law – i.e. it is not meeting its legal obligations
- where someone is covering up wrongdoing

3.4 Within this policy and guidance, such issues are generically referred to as 'wrongdoing' or 'concerns'.

3.5 Staff blowing the whistle in these areas, in the public interest, are protected by law. The GLA will also protect those who report serious financial regularities and other malpractice.

3.6 This policy specifically covers wrongdoing concerning or related to the GLA. The legal protections do, however, extend to workers more widely and staff are encouraged to report, to the relevant individual (see section 2 of the guidance below), wrongdoing not directly related to the GLA's work.

3.7 Personal grievances – for example, bullying, harassment and discrimination – are not covered by whistleblowing law or this policy, unless the particular case is in the public interest. Similarly, the procedures set out in this document do not replace the GLA's resolution policy and guidance and should not be used to deal with complaints that relate to a contract of employment. If a concern is raised through the whistleblowing process that would be more properly dealt with through the resolution procedure, it will be referred to the Assistant Director of People or a senior manager in their team.

3.8 There will be cases where staff or others have concerns about GLA practices or processes but there is no reason to believe there has been a specific case of wrongdoing. Though valuable information, this is not whistleblowing and in these cases the normal route is for the individual to provide feedback to their line manager or the manager responsible for the work area in question. Such feedback can be escalated if necessary to a more senior manager.

3.9 This policy is part of the GLA's wider arrangements for corporate governance and intersects with and supports other policies and procedures as explained at paragraph 1.4. It is also part of the GLA's anti-fraud and corruption framework and so is particularly closely linked to and mutually supportive of the GLA's Anti-Fraud and Corruption Policy and Response Plan.

3.10 Note the GLA's Anti-Money Laundering Policy sets down the process by which staff should report – and indeed how to identify – money laundering suspicion. The process is closely aligned to that in policy and requires that concerns are reported to the GLA's Anti-Money Laundering Reporting Officer, as set out in that policy.

## 4. Approach

### *a) Ensuring there is a simple, straightforward route for staff to raise concerns about wrongdoing at the GLA*

4.1 The options available for reporting wrongdoing are set out in part B of this document. The GLA will seek to make sure it is easy to find out how to blow the whistle, including referencing the guidance through the governance e-learning module, the intranet and regular updates to staff. It

will continue to make available a variety of routes for reporting wrongdoing so those with concerns to report can choose the option that best suits them.

4.2 Concerns about any impropriety of the Mayor or Assembly Members should be reported to the GLA's Monitoring Officer, who will liaise with the Chief Finance Officer as necessary. If the concern is not reported directly to the Monitoring Officer, they will be informed immediately.

4.3 It is not necessary to have proof that an act is being, has been, or is likely to be committed: a reasonable belief is sufficient. However, an employee has no responsibility to investigate the matter. It is the responsibility of the GLA as the employer to do so.

4.4 The GLA is also committed to hearing about other concerns that may not technically be whistleblowing and from people other than the GLA's staff. It will aim to treat all such concerns with the same care afforded to whistle blowers, noting, however, that the same legal protections may not be applicable.

4.5 The GLA will seek and listen to feedback about its reporting process to improve it when and where necessary.

#### *b) Protecting those who blow the whistle*

4.6 Under whistleblowing law, a worker who has made a protected disclosure (as per the list at 3.4) has the right not to fear detriment, victimisation or dismissal.

4.7 The GLA will protect any employee who makes a public interest disclosure without malice, regardless of whether the concern raised is upheld. Any victimisation of the whistleblower by an employee may result in disciplinary action. While the GLA will protect individuals who raise public interest concerns, disciplinary action may be taken against an employee who makes a malicious or knowingly false claim.

4.8 Wherever possible the GLA will make every effort to keep confidential the identity of the whistleblower. This may not always be possible: in limited circumstances there may be a legal obligation to release information about the case. Information obtained in the course of an enquiry may, in the public interest, be published in a final report.

4.9 Concerns can be raised anonymously – and the GLA has an externally run reporting line to facilitate this. It may, however, not be possible to investigate the concern without specific information.

#### *c) Treating all reports of wrongdoing fairly and with care – and taking each one seriously*

4.10 Line managers to whom a concern is reported must within two working days review its nature – and tell the whistleblower their concern is being looked into. Unless the concern can be dealt with simply – for example, because it proves to be a misunderstanding – they must in turn refer it to the Chief Finance Officer and the Head of Performance and Governance (or to the Monitoring Officer if it concerns a Member) before taking any action. The Head of Performance and Governance, or an officer nominated by them, will help determine the next steps.

4.11 The Head of Performance and Governance will ensure a log is maintained of reported concerns and the action taken in response to each. Where there are reports that are of a serious nature, the relevant Assembly Committee (the Audit Panel or GLA Oversight Committee) will be informed at its next meeting and kept updated. The Mayor will be informed of the most serious

reported wrongdoing. The Annual Governance Statement will reflect on any whistleblowing during the financial year in question.

4.12 At all times, the confidentiality of the persons blowing the whistle will be respected as far as possible and they will also be treated with care and professionalism. Each concern will be handled consistently and fairly.

*d) Promptly reviewing and thoroughly investigate reports of wrongdoing – seeking to put things right*

4.13 The GLA is committed to reviewing all suspected wrongdoing. There may be a simple resolution to the concern or a formal investigation may be required. Usually an investigation will follow the process explained in the GLA's Anti-Fraud and Corruption Response Plan or another relevant policy.

4.14 The whistleblower may be asked for further information and may also be invited to a meeting. People function can advise on the support available, including, for example, involving a trade union representative.

4.15 The GLA will take immediate action to prevent further losses or harm, and seek to put things right as far as possible. It will also take action against staff who through wrongdoing have breached the GLA's Staff Code of Ethics and Standards. The GLA will inform the police expeditiously where there is cause to believe there has been criminal wrongdoing.

4.16 The GLA will keep those raising concerns informed about the action it is taking. But it will also respect the confidence of others where appropriate.

4.17 The relevant Assistant Director or head of service is, where GLA systems or processes were deemed to be ineffective, responsible for taking action to ensure the risk of similar wrongdoing occurring again is minimised.

*e) Keeping this Whistleblowing Policy and associated arrangements under review and updating them periodically*

4.18 The GLA's Whistleblowing Policy will be kept under review to ensure it reflects best practice and supports the GLA's whistleblowing commitments – and that it supports wider GLA governance objectives. The primary vehicle for undertaking this review will be the Annual Governance Statement. The AGS will report any significant instances of whistleblowing that have taken place during the year in question. It will also reflect on any issues that have arisen in respect of the GLA's whistleblowing procedures.

4.19 In addition, this Policy will be reviewed and as necessary updated at least every two years.

4.20 Significant changes to the fundamental basis of this document will be signed off by the Chief Finance Officer via a director decision form. Changes that do not substantively alter its provisions, including drafting and presentational changes, corrections and smaller updates may be approved by the Head of Performance and Governance and do not require a decision form.

## 5. Responsibilities

### 5.1 Audit Panel:

- providing scrutiny of the GLA's whistleblowing arrangements
- receiving reports on and updates about serious reported concerns

### 5.2 Corporate Management Team:

- setting and promoting a top-level commitment to treating all reports of wrongdoing with care, taking each one seriously, and protecting those who blow the whistle
- encouraging staff and others to come forward with concerns
- ensuring within their directorate concerns are acted upon and action is taken to as far as possible put things right

### 5.3 Chief Finance Officer:

- acting as the GLA's champion for whistleblowing
- establishing and overseeing effective whistleblowing arrangements – and ensuring they are regularly reviewed
- receiving reports about and overseeing the response to incidents of wrongdoing<sup>1</sup> and reporting significant incidents to the Mayor and Audit Panel

### 5.4 Head of Performance and Governance:

- day-to-day oversight of the GLA's whistleblowing arrangements
- maintaining robust, up-to-date whistleblowing arrangements that reflect best practice
- maintaining a list of reported concerns

### 5.5 People Function:

- advising and supporting managers in implementing suspensions and disciplinary procedures
- ensuring employment matters are dealt with in a consistent and fair way regarding any case of suspected wrongdoing
- helping to ensure staff do not suffer a detriment as a result of reporting a concern

### 5.6 Internal Audit:

- advising on the appropriate response to reported concerns and supporting investigations into wrongdoing
- reviewing periodically the GLA's whistleblowing arrangements

### 5.7 All managers:

- ensuring any concerns reported to them are in turn passed on to the Chief Finance Officer and the Head of Performance and Governance

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<sup>1</sup> The Chief Officer will act in the place of the Chief Finance Officer in respect of specific incidents of wrongdoing if there are concerns about their involvement.



- respecting a whistleblower's confidentiality and protecting them from detriment, as per this policy
- taking action to ensure the risk of a similar incident of wrongdoing occurring again

#### 5.8 All GLA staff:

- reporting immediately suspected wrongdoing
- cooperating fully with any investigation into wrongdoing
- not victimising anyone who does report a concern

#### 5.9 Contractors, funding recipients and partners

- reporting concerns of wrongdoing at the GLA, and concerns related to their own organisation and that affect the GLA, to the Authority
- putting in place, maintaining and following their own whistleblowing arrangements
- cooperating with any investigations into wrongdoing and resulting action

# Part B: Whistleblowing guidance

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## 1. Introduction

1.1 This guidance explains the options available for Members and staff to blow the whistle about concerns of wrongdoing at the GLA. It should be read in conjunction with the above Whistleblowing Policy – and in particular section 3 of the policy, which has more information about what constitutes whistleblowing and the protections for staff who do blow the whistle.

1.2 In summary, when we talk about ‘whistleblowing’ and ‘wrongdoing’ we mean reporting issues in the public interest. It does not cover unfair treatment at work, which should be reported and dealt with under the GLA’s grievance procedures

1.3 There is a separate reporting route and process for concerns about the conduct of the Mayor and Assembly Members, which should be reported in the first instance to the Monitoring Officer.

1.4 Where matters not falling within this guidance are reported through one of the routes explained below, they will be redirected as appropriate.

1.5 The described reporting arrangements are predominantly for GLA staff to blow the whistle. Members, those we work with and others are, however, also encouraged to report wrongdoing by or impacting on the Authority. Section 3 of this guidance, below, explains how.

## 2. Reporting routes for staff

2.1 Work through the options below sequentially to find a way of reporting your concern you feel comfortable with and that is appropriate to your circumstance. As a general rule, you should only move on to the next option if you don’t feel comfortable using any of the preceding options. If you’re unsatisfied with how your concern has been handled, you can use one of the other routes available or escalate it to the Chief Officer<sup>2</sup>. Remember, if your concern is about the conduct of the Mayor or an Assembly Member, you should report it to the Monitoring Officer.

### *a) Your line manager*

2.2 You should normally raise and discuss your concern directly with your line manager in the first instance. Your manager will, if your concern is covered by the GLA’s Whistleblowing Policy, refer it to the Head of Performance and Governance or Chief Finance Officer. Any action will follow advice from the Head of Performance and Governance and/or Chief Finance

### **Box B: Information about your concern**

The sooner you raise your concern and the more information you can give us, the better. Staff should retain any evidence of the suspected malpractice already in their possession. They should also make immediate and detailed notes about: what they have witnessed and discovered, the course of events, what happened when and who was involved. The more direct and tangible the evidence is, the better the chance of a successful investigation. Staff should not, however, actively seek out additional evidence, undertake surveillance or conduct their own investigations.

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<sup>2</sup> You can contact [Protect](#), a whistleblowing charity, for external advice and help. If you’re unhappy about how you’ve been treated, you can speak to [Acas](#).

Officer. If a report is made to the Head of Performance and Governance rather than the Chief Finance Officer, they will escalate it to the Chief Finance Officer if appropriate.

#### *b) The Chief Finance Officer*

2.3 If you do not feel comfortable reporting your concern to your line manager – for example, because you have concerns about their involvement – then you can report it directly to the Chief Finance Officer.

#### *c) The Head of Audit and Assurance*

2.4 Similarly, you can also get in touch with the Head of Audit and Assurance – part of the GLA Internal Audit function provided by the Mayor’s Office for Policing and Crime. You can email CounterFraudTeam@mopac.london.gov.uk.

#### *d) EthicsPoint*

2.5 EthicsPoint is a reporting line run by a third-party, under contract, on behalf of the GLA. You can report a concern either by phone (0800 249 4584) or [here](#). You can do so anonymously. You are, however, encouraged to give your details. Note unless the Chief Finance Officer is implicated in the concern, the report will be passed on to the Chief Finance Officer by EthicsPoint.

2.6 More information about EthicsPoint is available on the [intranet](#).

#### *e) External options*

2.7 Staff who want to blow the whistle are strongly encouraged to make the disclosure to the GLA using one of the four options (a-d) above. This will help ensure your concern is dealt with promptly and by the right person. But if you feel unable to, you can report your concern to a specified external person or organisation, provided you reasonably believe:

- the disclosure is in the public interest
- the information disclosed and any allegation contained in it are substantially true
- you are disclosing the issue to the right person or body (for example, breaches of health and safety should be brought to the attention of the Health & Safety Executive)

2.8 A list of the external bodies you can report concerns to can be found on [gov.uk](#). The two main routes for blowing the whistle in local government are either to the GLA’s External Auditor or to The Comptroller and Auditor General at the National Audit Office.

2.9 Note if you report your concern to the media you will in most circumstances lose your whistleblowing rights.

### **3. Reporting routes for Members, partners and the public**

3.1 We want to hear about all concerns about our work, whether held or discovered by one of our staff or someone else. If you’re not a member of our staff, you can raise your concern using the

#### **Box C: Giving you feedback**

Wherever possible, if you report a concern we’ll aim to keep you informed about our progress in investigating it and any actions we plan to take or have taken as a result. There will, however, be limits to what we can say. Note, to ensure fairness, you cannot have a say in what action may be taken: how we proceed will be determined by the GLA’s policies and the Chief Finance Officer. But if you feel you concern has not been dealt with properly or fairly, you can complain to the Assistant Director of People or Chief Officer.

You may be asked for more information or invited to a meeting. We’ll let you know what support is available, for example, from a trade union rep.

routes below. If the concern is about something in the public interest, it will be passed to the Chief Finance Officer or the Chief Officer.

### *Members*

3.2 You should raise your concern with a senior manager in the relevant area. You can also speak to the Monitoring Officer.

### *Partners*

3.3 You should normally raise your concern with your contract or project manager. You can, however, get in touch with the Chief Finance Officer or our Head of Audit and Assurance.

### *The public*

3.4 Normally you should use our [complaints process](#). You can also get in touch and ask for the contact details of the Chief Finance Officer or Head of Audit and Assurance and then contact them directly. If you're not comfortable reporting your concern to us, you can report it to the relevant external body.

3.5 If you have complained to us and you are unhappy with our response, you can escalate your complaint to the [Local Government Ombudsman](#).