

NHS Grampian Whistleblowing Investigation - SOP & Guidelines for Investigators



1. Purpose

To ensure whistleblowing concerns are investigated fairly, consistently, and in line with NHS Scotland's values, legislation, and the INWO standards.

2. Scope

Applies to all NHS Grampian investigators, including internal and external investigators, handling whistleblowing concerns raised by staff, contractors, students, or volunteers.

3. Key Principles

- Fairness and impartiality
- Confidentiality and protection
- Timely and proportionate response
- Compliance with INWO standards and the Public Interest Disclosure Act (PIDA)

4. Roles & Responsibilities

- Investigator: Leads the investigation, ensures procedural fairness, and maintains confidentiality.
- Whistleblowing Lead: Provides local oversight and assurance.
- Speak-up Ambassador/Confidential Contact: Supports the whistleblower throughout the process.
- INWO (Scottish Public Services Ombudsman): Provides independent review if internal processes fail.

5. Investigation Process

Step 1: Receipt & Initial Assessment

- Acknowledge concern within 2 working days.
- Assess whether the concern qualifies under whistleblowing policy.
- Refer to appropriate internal lead or escalate if necessary.

Step 2: Planning

- Define scope, objectives, and timeline (Terms of Reference) in collaboration with the Whistleblowing Lead.
- Identify required resources and support.
- Ensure whistleblower protection measures are in place in collaboration with the Whistleblowing Lead

Step 3: Evidence Gathering

- Interview relevant parties.
 - Whistleblower (if permission given)
 - Witnesses
 - Subject of concern

- Review documentation, communications, and relevant records.
- Maintain a secure and auditable trail.

Step 4: Analysis

- Evaluate evidence objectively.
- Determine whether the concern is: Upheld, Partially Upheld, Not Upheld

Step 5: Reporting

- Prepare a clear, factual report including:
 - Summary of concern,
 - Investigation methodology,
 - Findings and conclusions,
 - Recommendations
- Share with relevant leadership and whistleblowing contacts.
- Provide feedback to the SUA/Confidential Contact (within confidentiality limits).

6. Timelines

- Initial response: within 2 working days
- Investigation start: within 5 working days
- Completion: ideally within 20 calendar days (extensions must be justified)

7. Confidentiality & Protection

- Protect whistleblower identity unless consent is given.
- Prevent retaliation or victimisation.
- Follow NHS Scotland's whistleblowing policy and INWO guidance.

8. Record Keeping

- Use standard templates for notes, letters, and reports.
- Store securely in line with GDPR and NHS Scotland data protection policies.

10. Special Cases

- Concerns involving fraud, safeguarding, or serious misconduct may require referral to external bodies (e.g. Police Scotland, Healthcare Improvement Scotland).

11. Support for Investigators

- Access to training on whistleblowing procedures and INWO standards.
- Guidance from HR, legal, and Speak Up contacts.
- Emotional support for complex or sensitive cases.

9. Post-Investigation Actions – to be coordinated by the NHS Grampian Whistleblowing Lead

- Implement recommendations.
- Monitor outcomes and ensure learning is embedded.
- Report to Whistleblowing Champion and INWO if required.

Guidelines for Investigators: Note-Taking & Documentation

1. General Principles

- Notes should be **accurate, objective, and contemporaneous**.
 - Avoid personal opinions, assumptions, or emotional language.
 - Use clear, professional language and avoid jargon.
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2. What to Record

- **Date, time, and location** of meetings or interviews.
 - **Names and roles** of all attendees.
 - **Summary of discussions**, including key points raised, questions asked, and responses given.
 - **Actions agreed**, including timelines and responsibilities.
 - Any **observations** relevant to the investigation (e.g. demeanour, tone, non-verbal cues—if relevant and factual).
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3. Format & Tools

- Use a **standardised template** for consistency (e.g. NHS Scotland interview note template).
 - Prefer **typed notes** over handwritten ones for legibility.
 - If using audio recordings (with consent), transcribe and securely store them.
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4. Confidentiality

- Store notes securely in line with **GDPR** and NHS Scotland's data protection policies.
 - Do not share notes outside the investigation team unless authorised.
 - Redact personal or sensitive information when sharing summaries.
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5. During Interviews

- Inform participants that notes will be taken and may be used in the final report.
 - Offer interviewees the opportunity to **review and confirm** the accuracy of their statements.
 - Avoid paraphrasing—use direct quotes where possible for clarity.
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6. After Interviews

- Finalise notes promptly—ideally within **24 hours**.
 - Label and file notes clearly (e.g. “Interview with [Name] – [Date]”).
 - Include notes in the investigation file as part of the audit trail.
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7. Audit & Review

- Ensure notes are reviewed by a second investigator or supervisor if required.
- Retain notes for the duration specified in NHS Scotland’s records management policy.
- Be prepared to share notes with INWO if the case escalates to external review.

For any questions, concerns or advice about this guidance please contact:
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For more information about whistleblowing please visit: [Whistleblowing](#)

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