



**Item No. 14**

**Meeting Date**

**Wednesday 22<sup>nd</sup> October 2025**

**Glasgow City  
Integration Joint Board  
Finance, Audit and Scrutiny Committee**

**Report By:** Pat Togher, Chief Officer, Glasgow City HSCP

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**Independent National Whistleblowing Officer (INWO) Report and HSCP Response**

**Purpose of Report:**

The purpose of this report is to update the IJB Finance, Audit and Scrutiny Committee about the report published by the Independent National Whistleblowing Officer (INWO) on [30<sup>th</sup> April 2025](#) and the HSCP's response to this.

**Background/Engagement:**

INWO carried out an investigation into a complaint it received concerning a decision to reduce specialist GP services at Hunter Street for people experiencing homelessness in Glasgow.

INWO published its final report on this investigation on [30<sup>th</sup> April 2025](#) with all 4 elements of the complaint being upheld. The report also asked the HSCP to implement a number of recommendations as a result of these findings.

A report to this Committee on [11<sup>th</sup> June 2025](#) set out the planned activity by the HSCP to address the recommendations in the final published report.

**Governance Route:**

The matters contained within this paper have been previously considered by the following group(s) as part of its development.

HSCP Senior Management Team ☐

Council Corporate Management Team ☐

Health Board Corporate Management Team ☐

Council Committee ☐

Update requested by IJB ☒

Other ☐

Not Applicable ☐

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<b>Recommendations:</b>	The IJB Finance, Audit and Scrutiny Committee is asked to: a) Note the content of this report.
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<b>Relevance to Integration Joint Board Strategic Plan:</b>
Although not directly relevant to the IJB's Strategic Plan, the INWO does make recommendations in relation to the Participation and Engagement Strategy and associated procedures for consultation and engagement, which would be applicable to ongoing and future activities in respect of the Strategic Plan.

### Implications for Health and Social Care Partnership:

<b>Reference to National Health &amp; Wellbeing Outcome:</b>	Outcome 3: People who use health and care services have positive experiences of those services, and have their dignity respected.  Outcome 4: Health and social care services are centred on helping to maintain or improve the quality of life who use those services.  Outcome 9: Resources are used effectively and efficiently in the provision of health and social care services.
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<b>Personnel:</b>	N/A
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<b>Carers:</b>	N/A
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<b>Provider Organisations:</b>	N/A
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<b>Equalities:</b>	The INWO's report includes recommendations in respect of the HSCP's duties under the Equalities Act 2010 and the undertaking of Equalities Impact Assessments.
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<b>Fairer Scotland Compliance:</b>	The INWO's report includes recommendations in respect of the HSCP's duties under the Equalities Act 2010 and the undertaking of Equalities Impact Assessments.
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<b>Financial:</b>	N/A
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<b>Legal:</b>	N/A
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<b>Economic Impact:</b>	N/A
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<b>Sustainability:</b>	N/A
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<b>Sustainable Procurement and Article 19:</b>	N/A
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<b>Risk Implications:</b>	Failure to carry out the recommendations set out by the INWO could result in reputational and legal risk to the IJB and HSCP and could also result in future challenge in respect of statutory duties in respect of consultation and engagement.
<b>Implications for Glasgow City Council:</b>	None.
<b>Implications for NHS Greater Glasgow &amp; Clyde:</b>	The INWO report is in respect of a function delegated to the IJB by NHS GGC and refers to the whistleblowing procedures within the Health Board.

### 1. Purpose

- 1.1. The purpose of this report is to update the IJB Finance, Audit and Scrutiny Committee about the report published by the Independent National Whistleblowing Officer (INWO) on [30<sup>th</sup> April 2025](#) and the HSCP's response to this.

### 2. Background

- 2.1. INWO carried out an investigation into a complaint it received concerning a decision to reduce specialist GP services at Hunter Street for people experiencing homelessness in Glasgow. The practice was closed in April 2023.
- 2.2. The complaint to INWO followed an investigation of a whistleblowing concern raised with NHS Greater Glasgow and Clyde in 2023 which was not upheld at Stage 2 of their whistleblowing procedure which concluded in September 2023.
- 2.3. The INWO investigated 4 specific elements in respect of the complaint, these being that the HSCP unreasonably failed to:
  - Follow a meaningful process of engagement and consultation with staff involved in the affected service prior to the decision
  - Carry out meaningful stakeholder consultation prior to the decision
  - Perform a full and timely assessment of risk and equalities impact
  - Take action to address long term risks associated with the decision
- 2.4. INWO published its final report on this investigation on [30<sup>th</sup> April 2025](#) with all 4 elements of the complaint being upheld. The report also asked the HSCP to implement a number of recommendations as a result of these findings.

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### 3. Communication with the IJB

- 3.1. Following publication of the final report on 30<sup>th</sup> April 2025, the HSCP prepared a briefing to the IJB, Health Board and External Stakeholders acknowledging and accepting the INWO's decision and recommendations (this was included as an attachment to the FASC report on [11<sup>th</sup> June 2025](#)).
- 3.2. The Chief Officer provided a verbal update to the IJB at its meeting on [14<sup>th</sup> May 2025](#) on the INWO's final report and confirmed that a more detailed report would be presented to this Committee as well as a discussion held at a future IJB Development Session.
- 3.3. A report to this Committee on [11<sup>th</sup> June 2025](#) set out the timeline of the correspondence between the HSCP and INWO in respect of the draft and final reports, as well as providing information on the planned activity by the HSCP to address the recommendations in the final published report.
- 3.4. Discussion led by the Chief Officer on the INWO report was originally scheduled for the IJB Development Session on 18<sup>th</sup> June 2025, however due to other priority business this was held over to the session on 3<sup>rd</sup> September 2025.

### 4. Update on HSCP Response to INWO

- 4.1. The HSCP committed to carrying out the recommendations identified by the INWO and has completed the necessary work to address Recommendations 1 and 2 within the timescales set out in the final report. The action taken and evidence provided to INWO in respect of Recommendations 1 and 2 were submitted on 23<sup>rd</sup> June 2025 and are detailed in Appendix A.
- 4.2. Recommendation 3 had two elements, the first of which (evidence that a Health Needs Assessment has been fully scoped and a plan is in place) was required to be submitted by 25<sup>th</sup> June 2025. A commissioning plan for a Health Needs Assessment was included in the submission on 23<sup>rd</sup> June 2025.
- 4.3. Following submission on 23<sup>rd</sup> June 2025, correspondence from INWO was received by NHS GGC and the GCHSCP Chief Officer on 1<sup>st</sup> July 2025 confirming that a review of the evidence had been undertaken and INWO were satisfied to sign off Recommendations 1 and 2, and the first element of Recommendation 3 as complete. INWO also advised that they would confirm this to the complainant at their request.
- 4.4. The remaining element of Recommendation 3 (completion of Health Needs Assessment) is due to be submitted by 28<sup>th</sup> October. Officers have confirmed that this is on target for completion by the required deadline.

### 5. Recommendations

- 5.1. The IJB Finance, Audit and Scrutiny Committee is asked to:
  - a) Note the content of this report.

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Recommendation	What INWO needs to see	Deadline	Evidence	Submitted
1. The HSCP ensure the principles in their Participation and Engagement Strategy are being met in practice.	<p>Evidence that the HSCP have:</p> <p>(i) systems and processes in place to support decision making on whether and to what extent consultation is required when a change is proposed</p> <p>(ii) ensured there are tools or mechanisms in place to support appropriate and timely stakeholder engagement</p> <p>(iii) reviewed their guidance and the training needs for all relevant staff to ensure achievement of the outcomes needed.</p>	23-Jun-25	<p>SMT report (110625) - Planning with People Update</p> <p>SMT presentation (110625) - Consultation and Engagement responsibilities</p> <p>GCHSCP Consultation and Engagement Guidelines - Full - April 2021</p>	23-Jun-25
2. Decision makers should be aware of their responsibilities under the Equalities Act 2010 and the need to complete timely equalities impact assessments.	<p>Evidence that the HSCP have:</p> <p>(i) reviewed the training needs for all relevant staff to ensure achievement of the outcomes needed</p> <p>(ii) shared the findings of my investigation with relevant staff in a supportive manner for reflection and learning</p> <p>(iii) Governance arrangements are in place to ensure that the Duty and supporting policy are followed when proposing a service change.</p>	23-Jun-25	<p>IJB Development Session (050325) - EQIA Presentation</p> <p>SMT Presentation (110625) – Public Sector Equalities Duties (PSED)</p> <p>Statement from GCHSCP Equalities Lead on PSED training and governance arrangements - June 2025</p> <p>Internal Guidance – Completing IJB Reports</p> <p>FASC report (110625) – INWO Report and HSCP Response</p>	23-Jun-25

Recommendation	What INWO needs to see	Deadline	Evidence	Submitted
3. The HSCP seeks to fully understand the impact of the service closure on patient health and the ongoing health needs of those experiencing homelessness are understood and services adjusted as required.	(i) Evidence that a health needs assessment has been fully scoped and a plan is in place to complete the assessment (with definitive timescales)  (ii) Evidence that the health needs assessment has been completed.	(i) 25-Jun-25  (ii) 28-Oct-25	Health Needs Assessment - Outline Commissioning Plan - June 2025	(i) 23-Jun-25