

# Whistleblowing in the civil service



## Good practice guide

February 2024

This guide provides insights and good practice for people who deal with whistleblowers, investigate concerns or manage whistleblowing processes in the civil service.

**We are the UK's independent public spending watchdog**

Communications Team  
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## Overview

Our 2023 investigation on whistleblowing in the civil service identified slow and inconsistent progress since 2014 in improving processes for managing whistleblowing. We recommended that the government make progress in three areas.

- Raising awareness and encouraging people to raise concerns.
- Ensuring a positive experience for whistleblowers.
- Using learning to improve whistleblowing arrangements.

This guide is our contribution, sharing wider insights from our investigative work in these three areas so that the government can apply the learning.

### Why whistleblowing is important

When we talk about whistleblowing in the civil service we mean when someone working in or with the civil service raises a concern about wrongdoing or malpractice connected to the civil service that has a public interest aspect to it. Whistleblowing is a vital organisational protection. It provides a way for organisations to hear concerns about serious wrongdoing that may not otherwise be discovered. The concerns reported can be wide-ranging, for example, financial mismanagement, environmental damage, and covering up wrongdoing. However, the process of raising, investigating and concluding a whistleblowing case is often challenging both for the individual and the organisation. It is common for whistleblowers to feel isolated, and whistleblowing can take a high personal toll, especially in cases that reveal serious wrongdoing or continue for years. This can inhibit other potential whistleblowers from acting. Organisations need to ensure they support whistleblowers and make their experience as positive as possible to overcome this barrier.

### The purpose of this guide

Our objective is to provide a practical 'how to' handbook to help improve whistleblowing in government. Our guide collates insights on common factors that contribute to good practice and gives people working in whistleblowing ideas on how they might adopt them. It also provides case study examples, and prompt questions for people to use for further learning. We do not make recommendations. Instead, we share insights and principles that people within organisations can adapt to their context to improve whistleblowing arrangements.

## Overview

### Who this guide is for

Our guide is for people who deal with whistleblowers, investigate concerns or manage whistleblowing processes in government organisations.

You might:

- work in HR policy;
- work in a team that oversees progress with whistleblowing cases;
- design whistleblowing processes in your organisation;
- be the first point of contact for whistleblowers who raise concerns by email or phone;
- investigate concerns raised by whistleblowers; or
- be a nominated officer or senior member of staff who people can raise concerns with.

### How to use it

Our guide contains:

- 10 good practice points to focus on, and why they matter;
- ‘what works well’ and what you can do to meet those good practice expectations;
- ‘keep in mind’ prompts to test your thinking on where you are now and what to work on; and
- case studies of approaches that other government organisations use to manage whistleblowing and support whistleblowers’ experiences.

Every organisation is different, so there is no single approach to follow for improving whistleblowing. Our guide is not a comprehensive list of everything you need to know or do. It does tell you what you need to be mindful of and what other organisations find helps them. But you will need to consider your organisation’s context and think about how the challenges and ways of working apply in your situation. Get in touch with our [People and Operational Management Insights team](#) if you want to know more about the insights in this guide.

### Where our insights come from

Our evidence base uses insights from focus groups with whistleblowing practitioners in government and our experience in dealing with civil service whistleblowers. We also draw on our systematic review of background documents such as good practice and previous recommendations made by us and the Committee of Public Accounts (PAC) on whistleblowing. For more detail see our methodology.

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## Summary of our insights

Theme	Good practice to focus on	Sample actions
 <p>Raising awareness of whistleblowing and encouraging people to raise concerns</p>	<p><b>Helping people understand types of concern and how to raise them</b></p> <p><b>Giving people the confidence to raise a concern</b></p>	<ul style="list-style-type: none"> <li>● Help people navigate the different ways to raise a concern and when they are appropriate to use.</li> <li>● Train people who deal with concerns so they can advise on the most appropriate route to use.</li> <li>● Promote whistleblowing arrangements.</li> <li>● Tell people how whistleblowers have helped the organisation.</li> </ul>
 <p>Helping to ensure that whistleblowers have a positive experience of raising a concern</p>	<p><b>Taking concerns seriously and investigating them in a timely way</b></p> <p><b>Managing the risk that whistleblowers experience detriment or negative consequences because of raising a concern</b></p> <p><b>Protecting a whistleblower's wishes to remain anonymous or be treated confidentially</b></p> <p><b>Supporting nominated officers and others involved in the whistleblowing process</b></p> <p><b>Supporting whistleblowers</b></p>	<ul style="list-style-type: none"> <li>● Manage expectations so that whistleblowers know what is likely to happen and when, including limitations, and update them on progress and outcomes.</li> <li>● Provide whistleblowers with feedback regularly about progress with their case and the outcome – be clear on any limitations.</li> <li>● Implement policies on disciplinary action to deter victimisation.</li> <li>● Make it clear what level of detail is needed from whistleblowers when they make first contact, especially for anonymous concerns.</li> <li>● Buddy less experienced nominated officers with more experienced officers, so they can learn from others when dealing with a case.</li> <li>● Put support in place for whistleblowers – let people know how to access it.</li> <li>● Seek feedback from whistleblowers about their experience and apply the learning.</li> </ul>
 <p>Using whistleblowing to support organisational learning and improvement</p>	<p><b>Getting assurance that whistleblowing processes are working effectively</b></p> <p><b>Collating and sharing information about whistleblowing to identify risks and areas for improvement</b></p> <p><b>Overseeing whistleblowing in arm's-length bodies</b></p>	<ul style="list-style-type: none"> <li>● Combine whistleblowing information with data from other sources, such as staff survey results and personal grievance cases, to generate richer insight.</li> <li>● Analyse data over time to spot trends and systemic issues to fix.</li> <li>● Use feedback from people going through the process to improve how it works.</li> <li>● Make it clear to people in arm's-length bodies how to raise concerns.</li> </ul>

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You need to make clear how to raise concerns

### Helping people understand types of concern and how to raise them

#### Why it matters

Organisations typically have different channels and processes for raising and dealing with concerns. But it can be difficult for staff to know what route to use for their type of concern. For example, concerns about personal grievances are not whistleblowing concerns but are often raised as such. Helping people choose the right route provides an appropriate and quicker response for them.

#### What works well

- Producing guidance and examples for staff that help them understand different types of concerns, how and when to use different routes for raising them, including for concerns that are not whistleblowing.
- Ensuring that nominated officers and other staff who receive concerns have the knowledge to advise people on the most appropriate channel to use. Redirect people to the right channel quickly.
- Providing staff with opportunities to raise concerns informally – such as through team meetings, staff forums or events with senior leaders – can help deal with concerns that are not whistleblowing.



#### Keep in mind

- People will raise concerns through whichever channel feels comfortable or appropriate to them. How you deal with 'misdirected' concerns should not make people feel undermined, ignored, or discouraged from raising concerns again.
- Analysing the routes people choose to raise concerns, and why, will provide insight on how to improve the whistleblowing process.

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### Case study

#### Maritime and Coastguard Agency (MCA): helping people to understand appropriate ways to raise concerns

**Reason for action:** The MCA views whistleblowing as something to encourage and welcome. It wants to ensure that everyone working in the organisation is aware of whistleblowing and how to raise concerns, so that all staff have confidence in the whistleblowing process.

**Approach:** MCA uses a range of ways to communicate with people working across the organisation to raise awareness of whistleblowing and how to raise a concern. It combines one-off events such as its 'Speak Up' week with ongoing activities throughout the year to raise and maintain awareness about whistleblowing. Activities during 'Speak Up' week and throughout the year include:

- presenting highlights from concerns raised in the previous year during 'Speak Up' week;
- providing tailored training about whistleblowing for different parts of the organisation, including operational teams, volunteers and technical specialists, so that the guidance is appropriate for their roles;

- using internal communications support to share information on how to raise concerns, examples of what might constitute a concern and a link to the 'Raising a Concern' policy with the whole organisation; and
- incorporating the importance of whistleblowing in 'Good Governance', how to raise a concern and contact details for nominated officers as part of induction training.

**Benefit:** MCA believes that keeping whistleblowing on the agenda throughout the year encourages people to come forward more readily. It recognises that many staff work at some distance from the corporate centre of MCA, so putting in an effort to connect with them about whistleblowing helps to ensure it is part of the wider workforce's agenda. MCA has the highest average number of concerns raised per 1,000 head staff for all civil service organisations annually (2019-20 to 2021-22), which can provide the organisation with a broad understanding of issues from across the organisation.

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### Case study

#### Department for Digital, Culture, Media & Sport (DCMS): using stories to show civil servants the most appropriate way to raise concerns

**Reason for action:** Whistleblowing concerns across government are sometimes raised through the wrong channel, making them difficult to identify. It is not always clear for staff which route to use if they want to raise a whistleblowing concern or a different type of issue.

**Approach:** DCMS includes short story examples in its 'Raising a Concern' policy and procedures to describe situations that civil servants might find themselves in that raise concerns. The stories show civil servants having concerns about something they have seen happening in and around the office and the correct way to raise their concerns. The stories describe example concerns raised under the 'Raising a Concern' policy and the 'Dispute Resolution' procedure.

**DCMS example of a whistleblowing concern covered by the 'Raising a Concern' policy:** "Malik noticed a colleague amending figures which were previously verified and signed-off in a document being prepared for a ministerial update which will eventually help inform public policy decisions.

The policy for 'Raising a Concern' applies because this is not a personal complaint and the behaviour that Malik has identified

is potentially a breach of the Civil Service Code and has a public interest element – i.e. deliberately misinforming ministers on matters of public interest."

**DCMS example of a general concern covered by the 'Dispute Resolution' procedure:** "Peter feels he and the staff in his team are being put under unnecessary pressure to meet unrealistic targets. The team leader has agreed a delivery plan with senior management without consultation with the team and it is obvious to them that it will be near impossible to deliver what is expected within the time given.

This issue can be dealt with through local management engagement and if the situation continues, members of the team may seek formal review using the Dispute Resolution policy".

**Benefit:** Using stories about raising concerns is a powerful way of engaging with people and showing them the right policy to use if they find themselves in similar situations. By using examples that fall under different types of policy, DCMS helps people know which route to use to raise concerns. This helps ensure their concern is dealt with by the right people and more quickly.

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You need awareness of whistleblowing and an environment that encourages speaking up to give staff confidence in raising concerns

### Giving people the confidence to raise a concern

#### Why it matters

When whistleblowing works well it allows organisations to identify and address concerns early on. Staff confidence in raising concerns needs to overcome barriers such as a lack of awareness of whistleblowing arrangements, fear of reprisal, assuming nothing will happen, and the potential of revealing whistleblowers' identities. Creating a culture where people are confident and feel safe to speak up relies on organisational behaviours. Good guidance and processes in themselves are not enough to make a difference.

#### What works well

- Having a whistleblowing policy and process that is accessible for all types of staff, including people working overseas, agency staff, contractors and former staff.
- Setting the tone from the top – senior leaders should promote whistleblowing arrangements and communicate that they welcome and take concerns seriously, and not just in once-a-year events.

- Telling staff how whistleblowers have helped the organisation, providing examples while protecting confidentiality.
- Giving potential whistleblowers options for reporting concerns so they can raise them in a way that is safe, including anonymously, with people of different seniority and outside of their management chain.

#### Keep in mind

- The day-to-day management and leadership environment in the workplace will inform whether people feel confident to raise concerns. It is important to work on behaviours outside of the whistleblowing process itself – for example, how senior leaders and line managers work with and respond to problems raised by their teams day to day.





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#### Case study

#### Department for Transport (DfT): demonstrating that whistleblowing is taken seriously and supported by senior staff

**Reason for action:** DfT has an objective to ensure that its people feel confident to raise concerns. It wants people working in the department to know that the organisation sees whistleblowing as something to support rather than discourage.

**Approach:** DfT uses senior support for whistleblowing to show that it is appropriately supported. Its senior staff create a consistent message for the organisation on the importance of feeling able to raise concerns. DfT demonstrates its senior support for whistleblowing in several ways.

- The Director General for the Corporate Delivery Group owns whistleblowing as an objective for the department, is involved in plans for whistleblowing and authors relevant articles for the department's intranet.

- It has a non-executive director champion for whistleblowing. They can provide a route for staff to raise concerns with someone senior who also has independence from DfT's leadership team. The non-executive also supports 'speak up week' and an annual item at the Group Audit and Risk Assurance Committee.
- Ministerial support for 'speak up week' in the department.

**Benefit:** DfT thinks that the senior support has helped in two ways. It believes that awareness of whistleblowing is improving, for example, its last 'speak up' event on whistleblowing had its highest ever attendance. It also thinks that senior support boosts the profile of whistleblowing, showing people working in whistleblowing that they are valued, and encouraging new people to take on roles such as nominated officers.

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#### Case study

#### Cabinet Office: using the nominated officer role to keep a whistleblower's identity confidential and build their confidence

**Reason for action:** The Cabinet Office knows whistleblowing is difficult to do. Some people do not feel confident raising their concerns with their line manager and wish to remain anonymous. Providing a way for people to raise concerns while remaining anonymous is essential to ensure that an organisation can hear all potential concerns. However, anonymity can hinder parts of an investigation, for example, if more information is needed to investigate the concern. It also makes it difficult to keep whistleblowers up to date with progress and action taken in response to their concern. A poor experience can discourage people from raising concerns again or new people coming forward.

**Approach:** In the Cabinet Office, whistleblowers can keep their identity confidential by choosing to speak to a nominated officer. Although a nominated officer may know who the whistleblower is, they are not known to anyone else (unless the whistleblower chooses to waive their right to anonymity). The nominated officers have a pivotal role, offering impartial support and advice to those who suspect wrongdoing and want to raise a concern. Their role is to ensure individual voices are heard and concerns properly addressed, while setting expectations for whistleblowers by

understanding what a whistleblower wants to happen and providing clarity in relation to the investigative process. The nominated officer can test what the whistleblower is comfortable sharing about the concern and with whom and discuss the implicit risks with them.

In cases where the whistleblower gives their consent, the nominated officer speaks to the policy owner in human resources (HR) and discusses the concern. The nominated officer also acts as a liaison between the whistleblower, HR teams and investigators, where relevant. All further communication with the whistleblower about the investigation, including progress and the outcome, is through the nominated officer.

**Benefit:** The nominated officer is an impartial role. They do not investigate concerns. The Cabinet Office believes that the nominated officer role provides independence from the HR team and ensures that the department is held to account for following policy and procedure in this space. The Cabinet Office feels that this separation from the HR team, combined with the nominated officer's commitment to ensuring the whistleblower's identity remains confidential when requested, builds trust in the whistleblowing process and encourages people to continue to come forward with concerns.

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You need to show that you take concerns seriously

### Taking concerns seriously and investigating them in a timely way

#### Why it matters

Whistleblowers can provide early warnings of potential issues. They need to feel that the organisation's culture supports them in raising concerns. Potential whistleblowers are less likely to raise concerns if they perceive that concerns are not dealt with appropriately. Some whistleblowers report that their concerns are ignored, don't lead to change or take a long time to investigate. Transparency about what happens in the whistleblowing process is crucial for building people's confidence.

#### What works well

- Sharing examples of positive outcomes and actions taken because of previous concerns.
- Setting out the timescales of the procedures for handling concerns in the organisation's whistleblowing policy. For example, how long it will likely take to arrange an initial meeting, provide feedback and investigate concerns.
- Managing the whistleblower's expectations by communicating the process to them and being transparent about whether there will be an investigation. At the start of the process, clearly explain how much feedback can be provided to the whistleblower and if there are limits due to the confidentiality of those under investigation.

- Providing feedback at regular intervals on how the case is progressing as well as the outcome of the investigation.
- Providing guidance to whistleblowers on how to raise concerns externally with a regulator or prescribed person if they are unhappy with the outcome.



#### Keep in mind

- Timescales will depend on the nature of the concern, capacity to investigate, and availability of key people. Bear this in mind when setting expectations on how long cases might take to investigate.
- Whistleblowers might not get the level of care they need if their concern is raised through the wrong route. Ensure processes route whistleblowers' concerns to the right people.
- Be transparent about likely feedback to prevent the impression that nothing has happened.

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#### Home Office: using a triage approach to route whistleblowing concerns to free up time for the people who can deal with them best

**Reason for action:** Concerns raised via the Home Office's 'Raising a Concern (including whistleblowing)' procedure often include matters best resolved through a different route. In 2022-23, a minority of concerns raised through the whistleblowing route in the Home Office were assessed as being whistleblowing cases. The Home Office identified an opportunity to route people raising concerns to the right people and processes more quickly. It also wanted to free up time for nominated officers, who are typically senior and busy people, to deal with whistleblowing rather than grievances or other types of cases.

**Approach:** The Home Office's Professional Standards Unit provides a department-wide route for raising concerns. The team will review a concern when it comes in, and assess what type it is by making initial enquiries. For example, whether the concern is an individual grievance, a disciplinary matter or a genuine whistleblowing case. When a whistleblowing concern is identified, a triage system is used to determine the severity of concerns. The most serious (which includes issues of severe and/or

imminent danger or unlawful behaviour, or that require immediate intervention) are always allocated to a nominated officer, as well as less severe or urgent cases that potentially qualify as whistleblowing and/or require independent specialist input. The remaining investigations are managed by the Professional Standards Unit, with nominated officer oversight when needed, who work with the business to ensure the most appropriate resolution is achieved.

**Benefit:** The triage approach ensures that people raising concerns are quickly directed to the best place for support and resolution of their concerns. The central team and triage approach also ensures that nominated officers have their time protected to deal with the cases that are most serious. These cases are given the time they deserve, ensuring people are listened to, and that a thorough investigation happens. Of all the concerns raised via the procedure in 2022-23, 19 were assessed as potential whistleblowing and nominated officers were allocated in seven cases, of which none were subsequently allocated to another route.

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### Case study

#### Ministry of Defence (MoD): taking 'start to finish' ownership of concerns raised

**Reason for action:** In 2014, MoD had no central oversight of whistleblowing and did not fully understand the nature of whistleblowing across the organisation. There were two separate policies owned by Human Resources, 'Handling matters of conscience' and 'Whistleblowing', with no central coordination requirements within the policy. MoD wanted a better understanding of what was happening on whistleblowing across the organisation.

**Approach:** MoD created a single policy on whistleblowing and a central team for reporting. The other routes, such as nominated officers and line management, remain available. However MoD encourages all whistleblowers, and those who have received whistleblowers concerns directly to report the matters to the central team so that duty of care is consistent for all those reporting concerns under this policy. The central team will advise whistleblowers of their rights, what to expect of the central team, and manages expectations for whistleblowers about the likely outcome and amount of contact to expect.

The investigations are carried out by other parts of MoD, but the central team works closely with the investigating organisations. In doing so the central team can transfer duty of care to the

investigating body, if the individual raising the concern is happy to do so, which can offer the whistleblower a better insight on progress with their raised concern.

**Benefit:** MoD believes that the central team approach provides several benefits. There is better support for people who raise concerns and the continuity of ownership allows the central team to address matters more directly with them and provide updates on actions. If policy or process is changed following an investigation, the central team share what the changes will look like with the whistleblower.

The central team is independent to any investigation so can hold people to account to ensure suitable progress is being made and all matters raised by the whistleblower have been addressed at conclusion. For example, the central team expects updates from the investigating body at point of conclusion and will seek policy and control improvements, where applicable, which the business areas are then held accountable for. This provides MoD assurance that it is complying and dealing with concerns raised appropriately, and there is better evidence available for any other actions, for example to support employment tribunals.

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You should take action to minimise the negative impacts of being a whistleblower

### Managing the risk that whistleblowers experience detriment or negative consequences because of raising a concern

#### Why it matters

Victimisation is a concern associated with being a whistleblower that can prevent people speaking up. Supporting and protecting a whistleblower is beneficial for the individual and wider organisation. It builds trust and makes it more likely people will come forward with concerns.

#### What works well

- Training managers and those likely to receive concerns on how to handle victimisation (see good practice on building capability).
- Holding discussions early on with the whistleblower to highlight potential risks they may face and understand their preference for managing these risks. Have regular check-ins with them to monitor risks.
- Implementing policies that indicate what whistleblowers can do if they experience detriment and the consequences for people who victimise whistleblowers.
- Taking appropriate and swift disciplinary action against employees, at all levels in the organisation, if they victimise whistleblowers.



#### Keep in mind

- Victimisation can take a variety of forms. Sometimes the behaviour is subtle, making it difficult to detect if it is happening. It can occur a long time after a whistleblower has made their disclosure and the case is closed. Set up processes and metrics that help you track the whistleblower's experience, during and after the investigation.
- Each whistleblower's circumstances are unique, so they will have different views on what they consider to be a detrimental risk. For example, some whistleblowers may find it helpful to change teams after raising a concern, but others would prefer to avoid this option.

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### Managing the risk that whistleblowers experience detriment or negative consequences because of raising a concern

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#### Department for Work & Pensions (DWP): being explicit about the consequences for deterring whistleblowing

**Reason for action:** DWP recognises that if people believe they may experience harm because of raising a concern in the workplace it might stop them doing it. Staff are less likely to speak up if they fear reprisals or receive threats, or implied threats, about the consequences for them if they raise concerns. DWP is also concerned that worrying about this might adversely affect the wellbeing of concerned staff.

**Approach:** DWP includes explicit reference to the consequences of deterring whistleblowing or punishing whistleblowers in its disciplinary guidance. What constitutes as gross misconduct

in DWP includes examples that deterring or preventing someone whistleblowing with threat or implied threat of adverse consequences will normally lead to dismissal with or without notice.

**Benefit:** DWP believes that by including the consequences for deterring whistleblowing explicitly in its disciplinary guidance, it demonstrates that it takes the matter seriously. It feels that clarity on the issue helps provide people with the confidence to raise concerns and shows that it supports them in speaking up.

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You need to help whistleblowers understand what anonymity means for them

### Protecting a whistleblower's wishes to remain anonymous or be treated confidentially

#### Why it matters

Anonymous disclosures are preferred over choosing not to make a disclosure. Organisations can address issues when they are aware of them, even if the whistleblower is not identified. People are more comfortable making disclosures if they can trust an organisation will protect their preference to remain anonymous where they can.

#### What works well

- Managing whistleblowers' expectations by being clear up-front and in policies about the extent to which you can protect their identity.
- Making sure that managers and whistleblowers are clear on the protection sought, including the difference between:
  - open concerns (where the whistleblower is unconcerned about their identity being connected to the raising of the concern);
  - confidential concerns (where the organisation makes assurances and efforts to protect someone's identity); and
  - anonymous concerns (where the organisation does not know who the whistleblower is).

- Improving the quality of information provided by whistleblowers when they first make contact. For example, this may involve producing guidance for whistleblowers on what information to include in whistleblowing disclosures.
- Being creative about how concerns can be investigated to help protect the identity of the whistleblower, such as including the investigation as part of a wider audit or routine check.

#### Keep in mind

- Investigators may not be able to contact the whistleblower to ask for further information, so it is important to gather as much information as possible at the start.
- Even if a whistleblower is not anonymous you can still take steps to keep their identity confidential.
- In some cases, there may be a requirement for organisations to reveal the whistleblower to another person or organisation even for confidential cases, for example, in matters of criminal or civil law. Let the whistleblower know if this is the case.
- Be careful of whistleblowers' anonymity in any communications.



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### Protecting a whistleblower's wishes to remain anonymous or be treated confidentially

#### Case study

#### Maritime and Coastguard Agency (MCA): protecting the confidentiality of whistleblowers' identity

**Reason for action:** The MCA is responsible for working with organisations and companies across the globe to implement British and international maritime law and safety policy. It receives concerns from people both inside and outside the organisation. Concerns are raised by a wide range of people, including volunteer coastguards, members of the public, cruise liner guests, crew on merchant vessels, as well as MCA staff. MCA aims to protect whistleblowers' identities during an investigation to encourage people to raise concerns. However, the source and nature of concerns can make it evident who has raised it and, in some cases, the whistleblower's identity may need to be disclosed if there is a legal case in court or internal disciplinary case.

**Approach:** MCA takes steps to protect the identity of a whistleblower throughout the investigation process. Its approach includes:

- being clear in email communications to investigators that whistleblowers are protected in law and to not inadvertently disclose the whistleblower's identity; as well as reminding investigators that certain details about investigations can make it evident to people working with the whistleblower who they are; and

- choosing an investigation approach that reduces the chances of revealing the nature of a concern and identity of a whistleblower, for example:
  - visiting operational sites across a geographical area rather than drawing undue attention by only visiting the location about which the concern has been raised; and
  - carrying out unannounced surveys of vessels in order to look at the concerns raised as part of the general inspection routine of vessels in UK ports, which will cover the specific concern.

**Benefit:** MCA thinks that its approach encourages people to raise issues and helps maintain working relationships within land-based teams or a ship's crew during and after an inspection – rather than revealing either an individual's identity or location of interest for the concern. MCA has the highest average number of concerns raised per 1,000 head staff for all civil service organisations annually (2019-20 to 2021-22).

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Supporting whistleblowers



You need to help whistleblowers understand what anonymity means for them

### Protecting a whistleblower's wishes to remain anonymous or be treated confidentially

#### Case study

#### HM Revenue & Customs (HMRC): 'help cards' to improve the quality of information about concerns reported anonymously

**Reason for action:** HMRC endeavours to build a 'speak up' culture where colleagues who become aware of any form of inappropriate behaviour feel confident they can take responsibility and act. Where this falls under the category of whistleblowing, HMRC offers several routes for whistleblowers to raise concerns, including 'InConfidence', its anonymous online reporting portal. To use the 'InConfidence' reporting portal, the anonymous whistleblower is given a unique PIN to log in to the system, which can be used for future communication with investigators, safeguarding the whistleblower's identity. More than half of HMRC's concerns are raised anonymously, so it is important for the department to ensure that anonymous reporting is as effective as possible. However, HMRC found that some anonymously reported concerns could not be investigated due to a lack of detail. HMRC needed a way to improve the quality of information provided first time by anonymous whistleblowers in order to allow investigations to go ahead.

**Approach:** HMRC created a 'help card' with guidance for anonymous whistleblowers to improve the information they provide. The 'help card' sets out what information is needed to allow an investigation to take place. For example, what the concern relates to, where the issue has taken or is taking place, who is involved, when it took place, and how the person raising the concern became aware of the matter. It also makes clear that, while HMRC welcome supporting evidence already held, colleagues should never investigate matters further themselves.

**Benefit:** The 'help card' has improved the quality of information that HMRC receives about anonymous submissions through the 'InConfidence' system, reducing the number of cases that could not be investigated by around 50%.

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You should ensure nominated officers and others who may receive whistleblowing concerns have the relevant knowledge and experience

### Supporting nominated officers and others involved in the whistleblowing process

#### Why it matters

A nominated officer is an additional role for existing staff members; they provide impartial advice and support about raising a concern to individuals working anywhere in the organisation. They make an important contribution to the effectiveness of an organisation's whistleblowing process. Anyone who is likely to receive concerns needs to have the capability to recognise when a concern is whistleblowing, escalate concerns to the right team, and provide guidance and support to whistleblowers.

#### What works well

- Training staff who may receive whistleblowing concerns on relevant areas to their role. This can include how to promote whistleblowing arrangements, respond to concerns, interact with whistleblowers, spot victimisation and triage cases.
- Encouraging people who may receive concerns to take responsibility for regularly refreshing their knowledge of their organisation's whistleblowing policy.
- Implementing systems to offer emotional support between nominated officers and others that may receive concerns.
- Encouraging knowledge sharing by buddying less experienced nominated officers with more experienced officers, so they can learn from others when dealing with a case.

#### 💡 Keep in mind

- A nominated officer is not a full-time job and it can be a burdensome role. Support and training for nominated officers should be appropriate to their experience, the size of their organisation and how often they deal with whistleblowing cases to help them do their role.
- Judgements about whether cases meet the definition of a whistleblowing case are not always straight forward. Familiarise yourself with your organisation's whistleblowing policy and collect sufficient information about the concern to help decide if it is whistleblowing.
- Having more than one nominated officer is beneficial as they can support each other, and people can choose who to report concerns to.

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### Supporting nominated officers and others involved in the whistleblowing process

#### Case study

#### Department for Transport: applying practical tips to help nominated officers and other staff deal with whistleblowing concerns

**Reason for action:** It is important to build trust and have good conversations when someone comes to a nominated officer with a whistleblowing concern. This will make the whistleblower more comfortable, improve the level of detail given at the start of the process and create a more positive experience for them. However, nominated officers might deal with concerns infrequently, so having ways of working that they can rely on will help them focus on the conversation with the whistleblower and make the most of their whistleblowing knowledge and experience.

An experienced nominated officer at DfT shares their top tips about having a good conversation with a whistleblower.

#### Practical tips:

- 1 If you know you are getting a call, read your department's 'Raising a Concern' policy. Refreshing your knowledge helps you have the right conversation.
- 2 Make sure that you have the required time, and contingency, for a conversation.
- 3 Make sure you have a private space to talk with whistleblowers.
- 4 Thank people for contacting you and reassure them. Explain your role – for example, the nominated officer's role is to help navigate the process.
- 5 Make sure you ask the right questions, such as what the concern is, what the issues are and any key dates and evidence. Creating and using a template checklist will help ensure you cover the right questions. Follow up your conversation with a written record of what they have told you.
- 6 Reply to people using an anonymous email address and update anonymous whistleblowers about the process and the outcomes.
- 7 Treat an anonymous email in the same way as you would treat a person in front of you. Use the same language, tone and style that you would if you were speaking with someone.
- 8 Decide with the whistleblower the right route to take.
- 9 Think about having a follow-up conversation a few days later if you need further information. Whistleblowers can just want to get the concern out in a first conversation. A follow-up can help them reflect and be more coherent.



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You should understand how your whistleblowing practices can impact potential whistleblowers

### Supporting whistleblowers

#### Why it matters

Being a whistleblower can be a stressful and emotionally difficult experience. If a whistleblower is supported, it can help other people feel comfortable in coming forward, and encourage disclosures.

#### What works well

- Giving staff different routes for raising concerns about whistleblowing so they can choose one that they are comfortable using.
- Signposting whistleblowers to sources of independent advice or support, such as trade unions, whistleblowing charities, occupational health or employment assistance programmes.
- Appointing a whistleblowing 'advocate' who can support whistleblowers outside of the investigation team as well as monitoring their wellbeing with regular check ins.
- Seeking feedback from all whistleblowers about their experience and learning from it regardless of the outcome of a case.



#### 💡 Keep in mind

- Whistleblowers have limited control over what happens once a concern is under investigation. In some cases it can seriously disrupt their personal life for a long period of time and have financial implications. Be clear who is responsible for supporting whistleblowers at key points, such as returning to work after absence.
- Consider routes for raising concerns in your organisation that are attractive to different staff grades and roles, acknowledge their working preferences and are accessible to them.
- Providing an independent route, or organisation, for staff to raise concerns with can help potential whistleblowers feel more comfortable.

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### Supporting whistleblowers

#### Case study

#### Department for Work & Pensions (DWP): integrating staff preferences into the reporting options and communication about whistleblowing

**Reason for action:** With a full-time equivalent headcount of over 80,000, DWP has a large workforce. Much of it is relatively junior, spread across hundreds of sites. DWP needs a way to connect with them so they have confidence to speak up and raise concerns. Its approach needs to work for all staff.

**Approach:** DWP tries to avoid a one-size-fits-all approach to whistleblowing. It offers people choices in how they raise concerns and sources of support – staff are more likely to use a route or source of support that they are comfortable with, chosen by them.

Staff can raise concerns in different ways including with 'Ambassadors for Fair Treatment', mental health first aiders, any trusted manager, or nominated officers. It also has a dedicated whistleblowing hotline, run independently of DWP by the Government Internal Audit Agency.

DWP tries to avoid overwhelming people with too much communication about whistleblowing using one channel. Instead, it 'drip-feeds' information about the different routes for raising concerns to increase the chances of reaching staff through their preferred channel. Approaches include:

- taking part in the civil service-wide 'Speak Up' week and holding a programme of whistleblowing events;
- pinning details about how to whistleblow using the hotline at the bottom of its intranet; the details link to the policy and are displayed on every page.
- working on communications about whistleblowing with partners such as trade unions – acknowledging that some people might be more comfortable speaking with their union representative; and
- including bite-size messages in the departmental bulletin 'Connect'.

DWP is also considering whether bespoke advice and reporting services might be beneficial for people working in different professions or roles in the organisation.

**Benefit:** DWP sees communication about whistleblowing as part of its efforts to show it is listening to its staff. In providing choice about how to raise concerns, and sources of support, it aims to give staff confidence that senior leaders want to know how things are going – and not just about whistleblowing. By offering a range of ways to raise concerns, DWP believes it is flexible to staff preferences making them more comfortable in coming forward.



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You need to know if whistleblowing arrangements are working

### Getting assurance that whistleblowing processes are working effectively

#### Why it matters

Judging the effectiveness of whistleblowing arrangements requires good and timely information about whether processes for raising and dealing with concerns are working and on the outcomes from every case. You also need to know if there are any gaps in wider sources about effectiveness, such as employee engagement surveys, or processes you need to put in place such as senior oversight and accountability. Reviewing individual processes for raising and reporting on concerns, and the wider system insight about the effectiveness of arrangements, helps internal audit and audit committees to independently scrutinise whistleblowing arrangements.

#### What works well

- Collecting rolling data on performance that provide a balanced understanding of effectiveness such as:
  - the number and type of concerns raised;
  - number of concerns raised as a proportion of headcount;
  - outcomes of investigations;
  - feedback from whistleblowers about their experience;
  - complaints of victimisation or failure to maintain confidentiality; and
  - data, for example from staff surveys, on awareness, trust and confidence in the arrangements.

- Using tools to assess arrangements, such as whistleblowing healthchecks, to create improvement plans rather than just as a compliance and reporting requirement.
- Having a non-executive or executive board member responsible for leading on the effectiveness of whistleblowing arrangements.
- Including reports about whistleblowing in the board and senior executive team agendas and reviewing the effectiveness of arrangements at audit committee.

#### Keep in mind

- Whether you have the measures you need to decide how to improve your part of the whistleblowing process. It might not be the same information that you report routinely about performance.
- You can read more about designing process measures and using them to spot opportunities to improve performance in our good practice guide on [how to improve operational services](#).



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You need to know if whistleblowing arrangements are working

## Getting assurance that whistleblowing processes are working effectively

### National Audit Office insight

#### Designing and using measures to improve how whistleblowing works



Our good practice guide on [improving services – using information](#) identifies what organisations can do to get assurance that their processes are working and decide how to improve. There are two aspects to prioritise.

- Designing measures that matter – you need to measure service performance based on what matters to the people who use the service.
- Understanding reasons for performance – you need to know the ‘why’ behind process performance.

Area to focus on	What you need to do
Designing measures that matter	<p><b>Include measures based on what users need from the whistleblowing process.</b> What matters to organisations providing whistleblowing processes for their staff might not be what is important to whistleblowers. Make sure there is a way to challenge your assumptions and test what is important for whistleblowers, as well as including measures about whether the process is working for the organisation.</p> <p><b>Make sure your measures are relevant for different types of whistleblowers and types of concerns.</b> Adjust your priority measures based on the needs of the person using the process – for example, speed might be most important for some whistleblowers, quality of service (such as regular updates) might be more important for others.</p> <p><b>Use insight from the people who work with whistleblowers to design your measures.</b> Get the people who work with whistleblowers day to day to tell you regularly what ‘good’ looks like for whistleblowers. They know what is important and are often the ones who deal with the fallout if you get it wrong.</p>
Understanding the reason for performance	<p><b>Measure the quality of the whistleblowing process not just the time that it takes.</b> Use balanced measures, which includes the quality of what you do, not just how many or how quickly, to judge performance and decide what to change.</p> <p><b>Measure quality at stages throughout the process, not just at the end.</b> Ensure that what good looks like is clear for everyone working in all parts of the process. Guidance, requirements and checklists can help people spot, investigate and fix any issues. Track the quality of inputs from whistleblowers – what is it telling you if they struggle giving you the information that you need?</p> <p><b>Design process measures and use insight to help you predict what is likely to happen.</b> Good lead measures help you predict, and do something about performance ahead of time. Measures of quality can help you think about how often you get what you need and when in the whistleblowing process, and what impact it has on later stages. Measure whether you get the inputs you need from everyone involved and use the insight to learn and improve your process.</p>



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You need to involve people in all whistleblowing roles when solving problems and sharing learning

### Collating and sharing information about whistleblowing to identify risks and areas for improvement

#### Why it matters

Making systemic changes and improving processes for whistleblowers requires information and analysis of all whistleblowing cases. It enables you to spot trends and patterns that you might not see in individual cases. Using information and involving teams from different parts of the organisation can join the dots and reveal new insight about whistleblowing. A richer, cross-team understanding supports better discussion, decisions and improvement actions.

#### What works well

- Collecting organisational data on whistleblowing cases in one place to identify recurring issues with how the whistleblowing process works and repeating concerns (while respecting whistleblower confidentiality).
- Combining whistleblowing information with data from other sources – such as staff survey results, personal grievance cases, and concerns raised through other routes or staff forums – to provide a richer source of insight.
- Analysing data in ways that allow you to spot trends over time as well as one-off problems. Senior leaders and audit committees should regularly discuss the data and agree actions.

- Involving people with different roles in whistleblowing to better understand and fix issues about the whistleblowing process itself or the concerns raised – for example, including policy teams, human resources, front-line teams and whistleblowers if possible.

#### Keep in mind

- The information that you have might only tell one part of the whistleblowing story. Bring together fragmented information from different reports and teams to spot issues and think about the role a central oversight function can play in leading or supporting that approach.
- Share your learning with other organisations to benefit from the collective knowledge, experience and improvements made by people elsewhere. If they manage whistleblowing differently you can still learn from how they approach improving their processes, such as the way they design and use performance measures.
- You can read more about using data, involving the right people and working across organisational boundaries to improve performance in our good practice guide on [how to improve operational services](#).



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### National Audit Office insight

#### Putting in place effective cross-organisation learning about whistleblowing

Our good practice guide on [Improving services – systematic improvement](#) identifies what organisations can do to enable learning and improvement across boundaries. You can apply the following good practice principles for sharing learning while being mindful of any need to protect whistleblower identity or anonymity:

##### Area to focus on

##### What you need to do

Fixing problems and sharing learning between different parts of your organisation and different organisations

##### Make improvements to whistleblowing by involving all the teams with roles in the process.

Build relationships and talk with people who do earlier and later parts of the whistleblowing process about the impact of process problems, and create a shared desire to fix them.

Are you explicit about what you need from other teams to do your role in whistleblowing? Do not just assume they know.

##### Share learning about whistleblowing across your organisation.

Share what is obvious or normal to you about the way you do your role in whistleblowing – it may not be obvious or normal for people in the same role elsewhere in your organisation.

Use structured and informal ways of sharing knowledge and insight, such as providing places and time for people to talk about their whistleblowing work with their colleagues in similar roles, encouraging online collaboration and offering regular training.

##### Share learning with people who have whistleblowing roles in different organisations.

Set up cross-organisation networks that bring together people in whistleblowing roles. Consider inviting people who work in different parts of your organisation, and from other organisations, for fresh perspectives on how and why things are done. Their input can help you challenge your pre-conceived 'why'.

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You need effective oversight of whistleblowing to know what is happening across extended delivery chains

### Overseeing whistleblowing in arm's-length bodies

#### Why it matters

Providing government services often involves different departments, local and central government, and many other bodies in the public and private sector. The number of organisations involved can create separation between the people who are ultimately accountable for the success of the policy and the people who provide the policy's services. Whistleblowers in arm's-length bodies can provide sponsoring departments with a valuable source of information about concerns from a perspective that is not readily available within the department. When departments have effective oversight of the whistleblowing arrangements in arm's-length bodies they can generate and use intelligence about concerns raised across the whole delivery chain.

#### What works well

- Reviewing the whistleblowing arrangements of delivery partners (or the delivery partners' assurance of arrangements) to ensure they are clear and understood by people working in those organisations.
- Sharing policies and procedures with delivery partners so they know the standards of conduct of public business that taxpayers expect.

- Encouraging delivery partners to share whistleblowing intelligence more widely to identify trends and possible issues, and target areas of risk.
- Creating transparency of central hotlines and other reporting options so people in arm's-length bodies can easily find the most appropriate route for reporting their concerns.

#### 💡 Keep in mind

- There is a risk of confusion for people working in arm's-length bodies about which organisation to raise concerns with and how, particularly if those organisations have different whistleblowing arrangements. Help them understand where and how to raise concerns.
- Create transparency by making sure delivery partners share reports about their whistleblowing arrangements. Make sure what you ask organisations to provide is realistic given their size and the resources required.

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### Overseeing whistleblowing in arm's-length bodies

#### Case study

#### Department for Transport (DfT): using the group audit committee to provide assurance on whistleblowing

**Reason for action:** DfT has five arm's-length bodies. Having good whistleblowing arrangements is one of DfT's objectives but each individual body in the Department for Transport Group (the Group) is responsible for implementing its own arrangements and reporting on concerns raised. DfT needs a way of assuring whether whistleblowing arrangements are effective in all bodies across the Group.

**Approach:** DfT has a non-executive director who champions whistleblowing. The non-executive supports an item, sponsored by a Director General, at the Group Audit and Risk Assurance Committee about whistleblowing. The items and the Committee's discussion are informed by a report on the number and nature of concerns raised across the Group.

**Benefit:** The audit committee session provides a forum for a full and open challenge about whistleblowing across all the different organisations in the Group. In the past it has led to challenges about the number of concerns raised and definitions of whistleblowing, such as whether concerns are whistleblowing or personal grievances. DfT feels that the annual scrutiny by audit committee ensures it is properly held to account for what is happening on whistleblowing across the Group and for completing actions arising from the discussion. Introducing a non-executive lead for whistleblowing is an example of a change following a Group Audit and Risk Assurance Committee meeting.

