National Audit Office

The UK's independent public spending watchdog

Switchboard +44 (0)207 798 7000
Direct Line +44 (0)207 798 7264
Email FOI@nao.org.uk

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WHISTLEBLOWING NOMINATED OFFICERS

Thank you for your further FOI request to the National Audit Office (NAO) dated 9 April. You asked for information about the NAO's nominated officers for internal whistleblowing disclosures. Your request has been considered under the terms of the Freedom of Information Act 2000 (FOIA).

We have checked our records and can confirm that we hold some of the information you requested. Your specific request is set out in **Annex A** where we have provided our response to each question.

Our policy is to respond to requests as helpfully and promptly as possible. I hope this information is helpful and you are happy with the way we have handled your request. If you are not happy with this response, you can ask for an internal review within 40 working days by writing to the NAO FOI Team at FOI@nao.org.uk. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The primary way of escalating your concerns to the Information Commissioner is at: https://ico.org.uk/foicomplaints.

Yours sincerely,

NAO FOI Team

Annex A

Your FOI request is in italics with our response to each question below:

1. ***Where your policy or process on whistleblowing / speaking up just refers to an individual by job title, please can you explain how employees in your organisation are aware of who the individual above is? (I am from outside central government and the civil service, so not certain if a junior employee would know how to link that job title to the real individual.)***

   The NAO's internal whistleblowing policy includes the names and email addresses of the individuals to whom employees can raise concerns, in addition to their job titles.

   The names and email addresses have been redacted from the published version of the policy on our external website https://www.nao.org.uk/corporate-information/nao-internal-whistleblowing-policy/

2. ***Do you document the whistleblowing and non-whistleblowing responsibilities (e.g. in a job description) of the individual(s) mentioned above? If so, please provide a copy. Where they have other non-whistleblowing responsibilities, a summary of those other duties will suffice. For instance, if they are a practising medical professional (nurse/doctor/researcher working in a hospital) or a senior civil servant (senior financial accountant, government lawyer governing HR matters).***

   The nominated officers' responsibilities are documented in our whistleblowing policy as follows:

   - providing advice and support to line managers/performance coaches/directors investigating a concern to ensure a consistent and fair approach;
   - investigating issues raised with them directly, promptly and thoroughly in line with the processes in this policy;
   - informing the Executive Team, or the Comptroller and Auditor General (C&AG) as appropriate, of whistleblowing cases and the actions being taken;
   - escalating concerns where appropriate and engaging additional support if required; and
   - informing Audit and Risk Assurance Committee of any whistleblowing activity, and the actions being taken, and keeping a central register of whistleblowing disclosures (kept by the head of Governance and Risk).

   In summary, the nominated officers' non-whistleblowing responsibilities are as follows:

   The **Head of Governance and Risk** is the Secretary to the NAO Board and is responsible for ensuring corporate governance arrangements contribute meaningfully to the strategic development of the NAO, and that the NAO becomes an exemplar of best practice in its corporate governance arrangements. The role also has oversight of NAO's risk management function.

   The **Head of Legal and Policy Advice** has responsibility for ensuring the provision of high quality legal and related policy advice across the NAO.

   The **Director of Internal Audit and Assurance** provides assurance to the C&AG, through the Audit and Risk Assurance Committee, by: reviewing risks to the achievement of the Office's objectives; making evidence-based recommendations for improving internal control; designing programmes of work to obtain assurance that material risks were being managed effectively; and commissioning approved work and securing its completion to audit standards.

   If an employee has concerns about the NAO Executive Team or the C&AG, they can contact the NAO's **Senior Independent Director (SID)**. The role of the SID is described in our policy as follows:

The NAO Board has nominated the senior independent director (SID) as a point of contact for NAO people who have a concern about potential wrongdoing by the Executive Team or the C&AG. The SID, in consultation with the NAO Chair, will decide the best way to proceed with a concern raised in these circumstances. This may include the SID investigating the concern themselves with the support of one of the nominated people – see overleaf. The SID may also consider appeals if there is dissatisfaction with how a concern raised under this policy has been handled by management

3. ***Please provide the amount of time the individual spends or is expected to spend on their whistleblowing / speak up responsibilities. (This can be working days per years, or hours per week for example. An estimated annualised number otherwise. It would help if you can confirm if it is actual / estimated / expected time.)***

The amount of time the individuals spend, or are expected to spend, on their whistleblowing responsibilities is not recorded.

4. ***How have you published the details of your Whistleblowing / Speak Up Officer / Nominated Officer? E.g. details of who to contact in the event of a concern. I would like to differentiate between media where you identify the role / title only (e.g. speak to the Nominated Officer) and identified individual (e.g. speak to Jane/John Smith). Please indicate if you do this via:***

Mechanism	**Role / title only**	**Identified individual**
a. department / organisation intranet sites		Information about the NAO's internal whistleblowing policy and individual contacts are published on our intranet site.
b. posters or noticeboards within departmental buildings		
c. mandatory staff training (in-person, computer-based training)		
d. internal communications (emails, videos, letters, desktop screens)		
e. clauses or appendices in staff employment contracts		
f. staff / employee handbooks		The NAO HR Manual includes a link to our whistleblowing policy which includes individual contacts.
G. Other (please specify)		The NAO Code of Conduct includes a link to our whistleblowing policy which includes individual contacts. The NAO Financial Audit Manual includes a reference to our whistleblowing policy which includes individual contacts.