

Assurance on NHS Boards’ Whistleblowing Reporting 2024-25



Contents

Message from the INWO	3
1. Executive summary	5
2. Introduction	7
3. Findings – quantitative data.....	8
4. Findings – qualitative data.....	12
5. Conclusion	14
Appendix A: National Whistleblowing Standards KPIs	15
Appendix B: Number of concerns received by Board	17



Message from the INWO



I welcome this national overview of how NHS Boards in Scotland are meeting the National Whistleblowing Standards' (the Standards) reporting requirements. The report and assurance against key performance provides important insight on how whistleblowing arrangements are operating across Scotland. From this we can see continued progress in the development and maturity of whistleblowing arrangements across NHS Boards as we seek to build further confidence in the system.

Transparency around feedback and how safety concerns are addressed is such a critical element of that confidence and an effective speak up culture. Reporting and assurance on performance are an important element of this and allows us to reflect on how we improve. Across Boards, it is, therefore, encouraging to see continued commitment to reporting against the agreed Key Performance Indicators (KPIs), improvements in data completeness, and positive progress in outcomes. At the same time, timeliness, the capture of people's experiences, and consistent training remain important areas for development.

The reporting process should be used not only to demonstrate compliance with the Standards, but as a genuine opportunity for learning and continuous improvement. It is also an opportunity to demonstrate to NHS staff that their feedback and concerns around patient safety are both valued and acted upon. I encourage Boards to continue to widely and actively promoting the findings of whistleblowing concerns to further promote a safe speak up culture.

As the Independent National Whistleblowing Officer (INWO) I will continue to challenge and support NHS Boards to further enhance speak up culture and improve the



effectiveness of whistleblowing mechanisms. This includes through actively encouraging, gathering and acting on feedback, ensuring that training and visible senior support for speak up culture reaches all staff, that patient safety risks are actioned effectively through the handling of concerns, and that collectively we continue to improve the timeliness of responses.

The INWO will continue to work alongside Boards to support this improvement journey as we seek to help strengthen Scotland's speak-up culture.

Paul McFadden

Independent National Whistleblowing Officer



1. Executive summary

- 1.1 **Assurance:** This report provides national assurance on NHS Boards' compliance with the Standards reporting requirements and the ten KPIs which are set out in [Appendix A](#).
- 1.2 The Standards set out how the INWO expects all NHS service providers to handle concerns that are raised with them and which meet the definition of a 'whistleblowing concern'. The purpose of the KPIs is to support organisational learning and service improvement by promoting consistent recording, review and analysis of whistleblowing concerns. Public reporting of this information helps build trust and confidence by demonstrating transparency, responsiveness and a commitment to addressing concerns and improving NHS services.
- 1.3 All NHS Boards in Scotland submitted an annual whistleblowing report for 2024–25. KPI compliance has improved overall; where Boards used the [Excel tool](#)¹, data quality was stronger and fewer clarifications were needed.
- 1.4 **Volume and Stage profile:** Boards reported 80 concerns in 2024–25 (up from 73 last year), with 78% of concerns closed in the year handled at stage 2, indicating complexity and that many concerns require a detailed investigation process.
- 1.5 The number of concerns has remained relatively consistent in recent years, with a slight rise this year and overall lower levels than at the start of reporting in 2021. This developing stability in volumes and stages helps build a clearer understanding of how procedures are being used across the system.

¹ The excel tool is a resource provided by the INWO which sets out what data is required from NHS Boards to comply with the ten KPIs set out in the Standards.



- 1.6 **Outcomes:** The proportion of concerns not upheld has fallen over three years (to 32%), while upheld (29%) and partially upheld (40%) have increased - this points to a maturing process, with more effective application of the Standards.
- 1.7 **Timescales:** The time taken by Boards to close stage 1 concerns increased to an average of 14 working days; 64% of concerns were closed within the five day timeframe. Stage 2 timescales reduced modestly from the previous year to an average of 104 days; 12% were closed within the 20 day timeframe. The Standards emphasise prompt action as well as investigations that are thorough and focused on good outcomes. Where more time is required, Boards should explain this within 20 working days and keep the whistleblower updated. Timeliness is an ongoing challenge; clear updates and robust investigation practice remain key.
- 1.8 Qualitative reporting remains variable. While 91% of Boards reported learning (KPI 1), reporting on the experiences of participants (KPI 2) and on training and awareness (KPI 3) continues to be inconsistent. These are important indicators of speak up culture and represent opportunities for improvement.
- 1.9 **Overall assurance:** Boards continue to demonstrate commitment to transparency and to meeting the reporting requirements of the Standards. The KPI data highlights areas of progress, alongside opportunities to mature the system further particularly around timeliness, capturing and acting on feedback, and ensuring consistent training and awareness. Continued focus in these areas will help strengthen Scotland's speak-up culture and enhance the safety and quality of NHS services.



2. Introduction

- 2.1 Following the introduction of the Standards on 1 April 2021, all Boards are required to publish and submit quarterly and annual whistleblowing reports to the INWO.
- 2.2 This report provides national assurance on Boards' compliance with the Standards' reporting requirements and the ten KPIs which support organisational learning and service improvement by promoting consistent recording, review and analysis of whistleblowing concerns.
- 2.3 It also draws insights from those reports highlighting system signals, data quality, and practical opportunities for improvement rather than analysing the underlying concerns themselves. That broader analysis will continue to be developed through INWO investigations, engagement with Boards, and future thematic reporting.
- 2.4 This report contains [Appendix A: National Whistleblowing Standards KPIs](#) and [Appendix B: Number of concerns received by Board](#) in Scotland per reporting year.



3. Findings – quantitative data

Figure 1: Summary of key figures

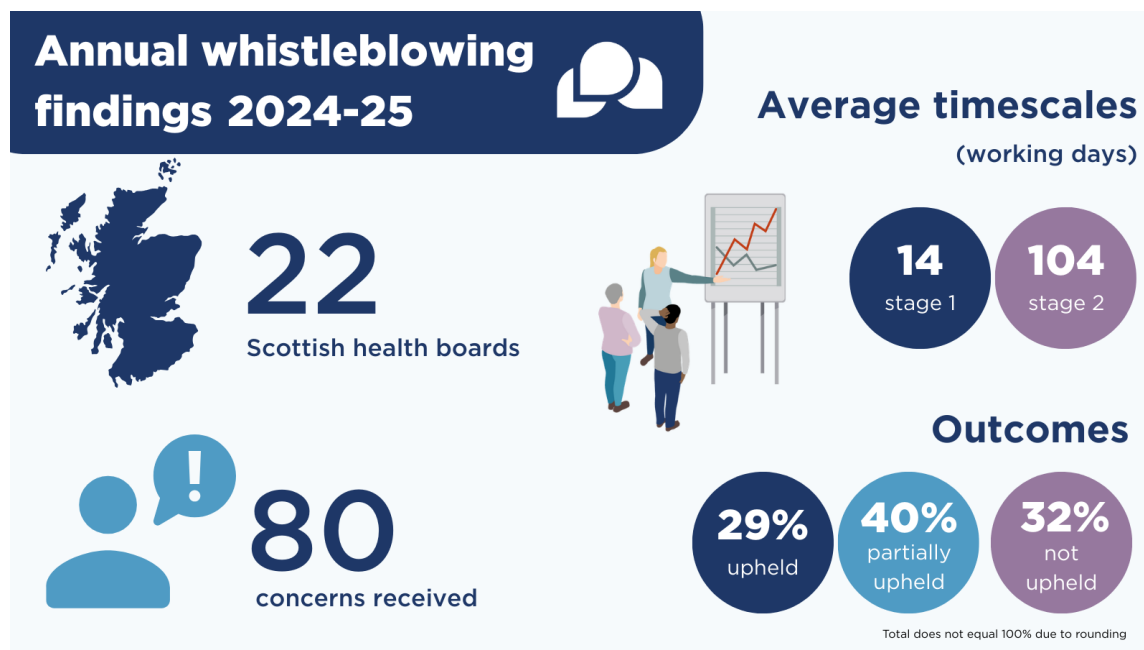
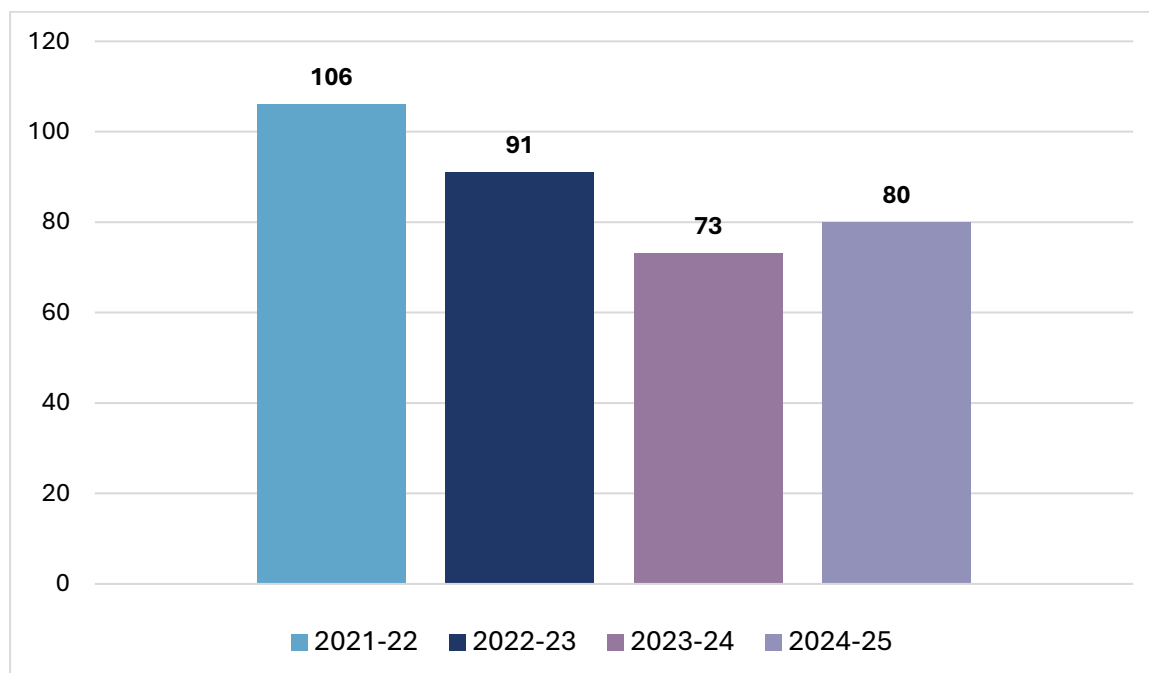


Figure 2: Total number of whistleblowing concerns received per year





3.1 Boards reported a total of 80 concerns received in 2024–25. This compares to 73 in 2023–24, reflecting a 10% increase. By comparison, this was a 25% decrease from the first year of reporting in 2021–22, when concern numbers were at their highest (106 concerns received²).

Board variation

3.2 Five Boards did not receive any whistleblowing concerns; this is similar to the previous year when six Boards reported none. One Board has not received any concerns since the Standards were introduced. The number and type of concerns vary across Boards, and these patterns can provide useful insight into how aware staff are of the Standards and how confident they feel about speaking up. Looking at how these patterns change over time can help each Board better understand what is happening within their organisation.

Closure and stage profile

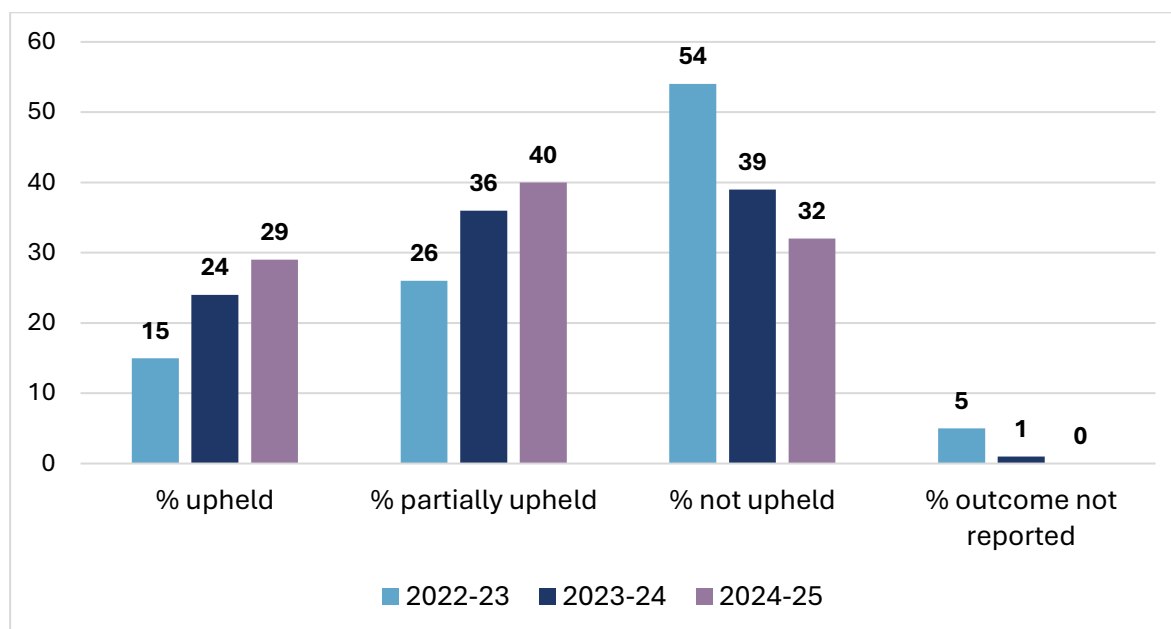
3.3 In 2024–25, 63 of the 80 concerns received were closed in the year. Of these, 14 were closed at stage 1 (22%) and 49 were closed at stage 2 (78%).

² Data integrity note: In our findings report for 2023–24, we incorrectly stated 102 concerns were received in 2021–22. The correct figure is 106. We also stated that 92 concerns were received in 2022–23, however the actual figure was 91.



Outcomes

Figure 3: Outcome of closed concerns



3.4 2024–25 is the first year that all Boards reported every outcome from their reported concerns. This is a welcome improvement and means that national whistleblowing data is more accurate³.

3.5 **Stage 1 outcomes:** Of the concerns closed at stage 1, there was a fairly even split in outcomes, with 43% upheld or partially upheld and 57% not upheld.

3.6 **Stage 2 outcomes:** The vast majority of concerns closed (78%) were handled at stage 2, indicating the complexity and risks these concerns raised. Of these 49 concerns, 37 were partially or fully upheld (76%), and 12 were not upheld (24%).

³ Not all boards consistently reported the outcomes of all concerns since 2021-22, we have used the data reported to us for comparison purposes.



3.7 **Overall outcomes (all closed concerns):** 29% upheld, 40% partially upheld, 32% not upheld.⁴

3.8 Not upheld outcomes have reduced over the last three years, while upheld and partially upheld outcomes have increased. This suggests clearer assessment and more consistent application of the Standards. Boards should continue to focus on investigation quality and ensure timely follow-through on actions where concerns are upheld.

Timeliness

3.9 The Standards provide timescales for handling and closing concerns: stage 1 = 5 working days; stage 2 = 20 working days.

3.10 **Stage 1 timeliness:** The proportion of concerns closed within the 5 day timescale was 64%. The average working days to handle and close concerns at stage 1 was 14 days, a 56% increase on last year's average (9 working days).

3.11 We encourage Boards to review cases that take longer at stage 1 and check whether they were managed at the appropriate stage of the procedure. Some concerns may be too complex for stage 1 and should move directly to stage 2 to avoid delay.

3.12 **Stage 2 timeliness:** Timescales for handling concerns at stage 2 decreased. Only 12% of stage 2 concerns were closed within the 20 working day timeframe. The average working days to handle and close concerns at stage 2 was 104 days, compared to 114 days in 2023–24. This 9% decrease in average timescales is welcome, and we hope to see further improvement.

⁴ Total does not equal 100% due to rounding



- 3.13 Timescales at stage 2 have lengthened over the past three years, with investigations taking an average of 75 days in 2022–23.
- 3.14 We will continue to work closely with Boards to support sustained improvements through advice, oversight and our [Support and Intervention Policy](#). Timeliness remains a critical factor in maintaining confidence in the whistleblowing process, as well as ensuring that any risks associated with the concerns raised are appropriately managed throughout the investigation period. Extended timescales can also delay the implementation of learning and improvement actions, so continued attention in this area is essential.

4. Findings – qualitative data

- 4.1 KPIs 1, 2 and 3 require Boards to include qualitative statements about whistleblowing, allowing deeper insight through reporting about learning and improvement, experiences of everyone involved, and awareness and training.
- 4.2 **KPI 1 (learning, changes or improvements):** 91% of Boards met KPI 1 and provided a statement outlining learning, changes or improvements to services or procedures as a result of their consideration of whistleblowing concerns.
- 4.3 **KPI 2 (experiences of all participants):** KPI 2 requires Boards to provide a statement to report the experiences of all those involved in the whistleblowing procedure. 64% of Boards provided a statement in line with this requirement.
- 4.4 This means Boards are not optimising learning from experience to improve their whistleblowing procedures. Feedback should be gathered from everyone involved, including whistleblowers, confidential contacts, witnesses and investigators. Where no concerns have been raised, feedback can still be sought from confidential contacts, who may have given advice and have feedback on why staff do not go on to raise concerns.



- 4.5 **KPI 3 (perceptions, awareness and training):** Reporting on levels of staff perceptions, awareness and training is captured in KPI 3. 86% of Boards reported on this measure. This was an improvement from 2023–24, with many Boards now able to show the proportion of staff who completed training within the year.
- 4.6 Five Boards did not provide any indication of staff training numbers, and some reported that fewer than 50 staff⁵ had completed the training. Others were able to report that over 90% of their staff had completed training.
- 4.7 There is a wide variation in training practices across different Boards. Some make it mandatory for all staff, others require it of certain groups (e.g., new staff, confidential contacts and those directly involved in the process).
- 4.8 Boards should move beyond compliance and use qualitative reporting as a tool for learning and improvement. Systematic, inclusive feedback along with clear, consistent training expectations will strengthen trust, improve processes, and build an environment where staff feel safe and supported to speak up.
- 4.9 More information about how to report on qualitative KPIs is available in our [Good practice guidance for annual whistleblowing reporting](#).

Opportunities for improvement

- 4.10 Adopt the [Excel tool](#) by default to strengthen completeness and comparability.
- 4.11 Reduce stage 1 timescale outliers by triaging early for complexity, moving those cases to stage 2 faster.

⁵ [Appendix B](#) details the total number of staff per board.



- 4.12 Adopting an improved structured approach to stage 2 cases, planning, evidence collection and decision making, supported by senior level overview of cases that remain open for longer periods.
- 4.13 To improve learning and consistency, strengthen and encourage a short, structured KPI 2 feedback process that invites input from whistleblowers, confidential contacts, witnesses and investigators, including when volumes are low.
- 4.14 Clarify training expectations (KPI 3) for key roles; publish completion rates as a workforce percentage.

5. Conclusion

- 5.1 This year's reporting provides assurance that Boards remain committed to the Standards and that reporting maturity continues to develop. While the KPI data highlights areas of improvement, particularly in outcome reporting and data completeness, it also indicates where further focus would be beneficial. The report sets out several opportunities for improvement, aimed at strengthening consistency, communication and the overall quality of whistleblowing processes. As the independent oversight body, the INWO will continue to support Boards through guidance, engagement and, where appropriate, the [Support and Intervention Policy](#).



Appendix A: National Whistleblowing Standards KPIs

KPI	Requirement
1	a statement outlining learning, changes or improvements to services or procedures as a result of consideration of whistleblowing concerns
2	a statement to report the experiences of all those involved in the whistleblowing procedure (where this can be provided without compromising confidentiality)
3	a statement to report on levels of staff perceptions, awareness and training
4	the total number of concerns received
5	concerns closed at stage 1 and stage 2 of the whistleblowing procedure as a percentage of all concerns closed
6	concerns upheld, partially upheld, and not upheld at each stage of the whistleblowing procedure as a percentage of all concerns closed in full at each stage
7	the average time in working days for a full response to concerns at each stage of the whistleblowing procedure
8	the number and percentage of concerns at each stage which were closed in full within the set timescales of 5 and 20 working days
9	the number of concerns at stage 1 where an extension was authorised as a percentage of all concerns at stage 1



10	the number of concerns at stage 2 where an extension was authorised as a percentage of all concerns at stage 2
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Appendix B: Number of concerns received by Board

Board	No. of staff (headcount)	No. of concerns received assessed as eligible for consideration under the National Whistleblowing Standards			
		2021-22	2022-23	2023-24	2024-25
Golden Jubilee National Hospital	2,644	0	1	0	0
Healthcare Improvement Scotland	593	0	0	0	0
NHS 24	2,199	0	0	1	1
NHS Ayrshire and Arran	11,931	5	3	1	4
NHS Borders	3,519	1	3	1	4
NHS Dumfries and Galloway	4,916	3	2	0	1
NHS Education for Scotland	2,072	0	1	2	1
NHS Fife	10,158	2	1	1	5
NHS Forth Valley	7,526	6	13	2	5
NHS Grampian	16,888	14	8	18	18



NHS Greater Glasgow and Clyde	42,235	29	19	16	8
NHS Highland	11,413	5	5	6	2
NHS Lanarkshire	15,459	2	3	1	2
NHS Lothian	28,352	14	11	10	7
NHS National Services Scotland	3,440	4	2	1	0
NHS Orkney	741	2	1	0	1
NHS Shetland	868	0	1	2	0
NHS Tayside	14,952	6	4	5	4
NHS Western Isles	1,109	1	2	0	2
Public Health Scotland	1,224	0	1	1	1
Scottish Ambulance Service	5,875	6	11	5	14
The State Hospital Board for Scotland	664	2	0	0	0
Total	188,778	102	92	73	80