



## Whistleblowing Annual Report 2025/2026

### 1. INTRODUCTION

- 1.1 This is the fifth Annual Whistleblowing Report which is presented to the NHS Borders Board for consideration.
- 1.2 During the year 2025/26 our Executive Lead for Whistleblowing, the Director of HR, OD & OH&S retired. We appointed a new Director of People & Culture in February 2026 who took on the role of Executive Lead for Whistleblowing.
- 1.3 An Internal Audit on Fraud Risk Management and Whistleblowing was also undertaken during this period.
- 1.4 The whistleblowing element of the InPhase risk system has also been developed with the aim of roll out in 2026/27.
- 1.5 An annual communications plan has been developed, aiming to distribute quarterly updates throughout the organisation to foster a progressive "speak up" culture.

### 2. KEY PERFORMANCE INDICATORS (KPIs)

Key Performance Indicator	Requirement	Local Update
1	<b>Statement outlining learning, changes or improvements to services or procedures as a result of consideration of whistleblowing concerns</b>	There were 2 whistleblowing cases raised for the year 2025/26.  Case 1 was resolved at Stage 1.  Case 2 is a complex case. The first notification was 13.11.24. The case had been held in abeyance following INWO advice to allow HR processes to conclude, so there have been significant delays.

		There have been 347 working days since 13.11.24. Difficulties were being encountered in being able to identify a willing external investigator in order to commission the investigation.
2	<b>Statement to report the experiences of all those involved in the whistleblowing procedure</b>	<p>There have been 2 whistleblowing cases raised for the year 2025/26.</p> <p>Case 1 – Resolved at Stage 1 as it was an HR issue. Case 2 – Held in abeyance until all HR processes had concluded.</p> <p>As we are a small Health Board due to confidentiality we are unable to provide commentary on the experiences of those involved in these cases.</p> <p>During 2025/26 at the whistleblower's request, INWO reviewed Case 4 (2024/25 Annual Report) and recommended that the Board issue a further apology, update investigation guidance, information governance guidance and improve confidentiality procedures. All guidance was updated as a package for investigators and covered information governance and confidentiality. All actions were completed to INWO's satisfaction during 2025/26.</p>
3	<b>Statement to report on levels of staff perceptions, awareness and training</b>	<p><u>Staff Awareness</u> – From 29 September to 3 October 2025, NHS Borders engaged in Speak Up week. The theme was “Listen Act, Build Trust” and aligned well with our work co-producing a new organisational strategy, the engagement exercises that took place across the summer on the clinical strategy and our focus on formulating a social compact.</p> <p><u>Staff Training</u> – During 2025/26 the following Whistleblowing training via Learnpro has been completed:</p>

		<p>Number of staff (Head count): 3142  Number of Managers (Head count): 396</p> <p>Total No of Staff who have completed 'Whistleblowing for staff' training: 123  % of total staff who completed training: 3.92%</p> <p>Total No of Staff who have completed 'Whistleblowing for line managers' training: 43  Total No of Staff who have completed 'Whistleblowing for senior managers' training: 28  No of managers who completed training: 71  % of managers who completed training: 17.93%</p> <p>During 2025/26 the following Whistleblowing training via eLearning has been completed:</p> <p><i>Whistleblowing for senior managers –7 learners</i>  <i>Whistleblowing for line managers – 26 learners</i>  <i>Whistleblowing for staff – 81 learners</i></p> <p><u>Board Awareness</u> – The annual iMatter survey outcomes are reviewed by the Board to seek assurance that our staff have the awareness and ability to speak up should they have any concerns.</p> <p>The NHS Borders website was regularly updated in the period 2025/26 and includes the whistleblowing quarterly and annual reports as well a flowchart for staff and contractors to understand how whistleblowing concerns are taken forward.</p>
4	<b>Total number of concerns received</b>	From 01 April 2025 to 31 March 2026, NHS Borders received 2 whistleblowing concerns.

		<p>During 2025/26 2 concerns were received and investigated to see if they passed the definition for whistleblowing. NHS Borders did not think that 1 case (Case 1) met the criteria and referred it to the organisations internal HR process.</p> <p>The other concern involved Case 2 which progressed to the commissioning of an external investigation following lengthy delays due to the concluding of HR processes as agreed with INWO.</p>
5	<b>Concerns closed at stage 1 and stage 2 of the whistleblowing procedure as a percentage of all concerns closed</b>	<p>During 2025-26 1 Whistleblowing Case was concluded at Stage 1 (Case 1).</p> <p>During 2025/26 1 Whistleblowing Case was progressed to the commissioning of an external investigation following a lengthy delay to allow HR processes to conclude (Case 2).</p>
6	<b>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</b>	<p>During 2025-26 1 Whistleblowing Case was concluded at Stage 1 – Not Upheld (Case 1).</p>
7	<b>Average time in working days for a full response to concerns at each stage of the whistleblowing procedure</b>	<p>For Whistleblowing Case raised in 2025/26 under Stage 1 the total time taken from notification to resolution was 2 days (Case 1).</p> <p>Case 2 is a complex case. The case had been held in abeyance following INWO advice to allow HR processes to conclude, so there have been significant delays. There have been 347 working days since the case was raised.</p>
8	<b>Number and percentage of concerns at each stage which were closed in full within the set timescales of 5 and 20 working day</b>	<p>For Whistleblowing Case raised in 2025/26 the total time taken from notification to resolution was 2 days (Case1).</p>

9	<b>Number of concerns at stage 1 where an extension was authorised as a percentage of all concerns at stage 1</b>	No cases handled under Stage 1 required an extension.
10	<b>Number of concerns at stage 2 where an extension was authorised as a percentage of all concerns at stage 2</b>	Case 2 has had lengthy delays and systems are now in place to record extensions at 20 working day intervals. These were inconsistent in 2025 and have been applied consistently in 2026.

### 3. CONCLUSIONS

- 3.1 The NHS Borders approach to handling whistleblowing allegations under the INWO Standards continues to evolve in line with evolving guidance from INWO.
- 3.2 NHS Borders appreciates that the decision to pursue whistleblowing allegations is not taken lightly and wishes to express its thanks to those parties who took the time and effort to do so during 2025-2026, and also to staff who were involved in responding to concerns, including our network of Confidential Contacts.
- 3.3 In terms of improving our learning from whistleblowing cases, we have developed an improvement plan that remains live and is discussed at our regular Whistleblowing Governance Group to ensure progress is being made.

**LYNNE LIVESEY**  
Whistleblowing Champion

**AVRIL KEEN**  
Executive Lead for Whistleblowing

**IRIS BISHOP**  
INWO Whistleblowing Liaison

**YEAR END REPORTING - INWO**

Reporting Year:

2025-26

KPI	Category (link to Guidance)	Description	Total	Percentage
3	<a href="#">Staff perceptions, awareness and training</a>	No of staff (headcount)	3142	
3		No of staff who completed training	123	
3		% of total staff who completed training	3.92%	3.92%
3		Manager headcount	396	
3		No of managers who completed training	71	
3		% of managers who completed training	17.93%	17.93%
4		<a href="#">Received</a>	Total number of concerns received	2
5	<a href="#">Closed</a>	Total number of concerns closed	1	
5	<a href="#">Stage 1</a>	Number of concerns closed at Stage 1	1	100%
5	<a href="#">Stage 2</a>	Number of concerns closed at Stage 2	0	0%
6	<a href="#">Stage 1 Outcomes</a>	Number of concerns upheld at Stage 1	0	0%
6	<a href="#">Stage 1 Outcomes</a>	Number of concerns partially upheld at Stage 1	0	
6	<a href="#">Stage 1 Outcomes</a>	Number of concerns not upheld at Stage 1	1	100%
6	<a href="#">Stage 2 Outcomes</a>	Number of concerns upheld at Stage 2	0	0%
6	<a href="#">Stage 2 Outcomes</a>	Number of concerns partially upheld at Stage 2	0	
6	<a href="#">Stage 2 Outcomes</a>	Number of concerns not upheld at Stage 2	0	0%
7	<a href="#">Stage 1 Avg Working Days</a>	Average working days for concerns at Stage 1	2	
7	<a href="#">Stage 2 Ave Working Days</a>	Average working days for concerns at Stage 2	347	
8	<a href="#">Stage 1 Timescales</a>	Number of concerns at Stage 1 closed within 5 working days	1	100%
8	<a href="#">Stage 2 Timescales</a>	Number of concerns at Stage 2 closed within 20 working days	0	0%
9	<a href="#">Stage 1 Extensions</a>	Number of concerns at Stage 1 with authorised extension	0	0%
10	<a href="#">Stage 2 Extensions</a>	Number of concerns at Stage 2 with authorised extension	1	100%