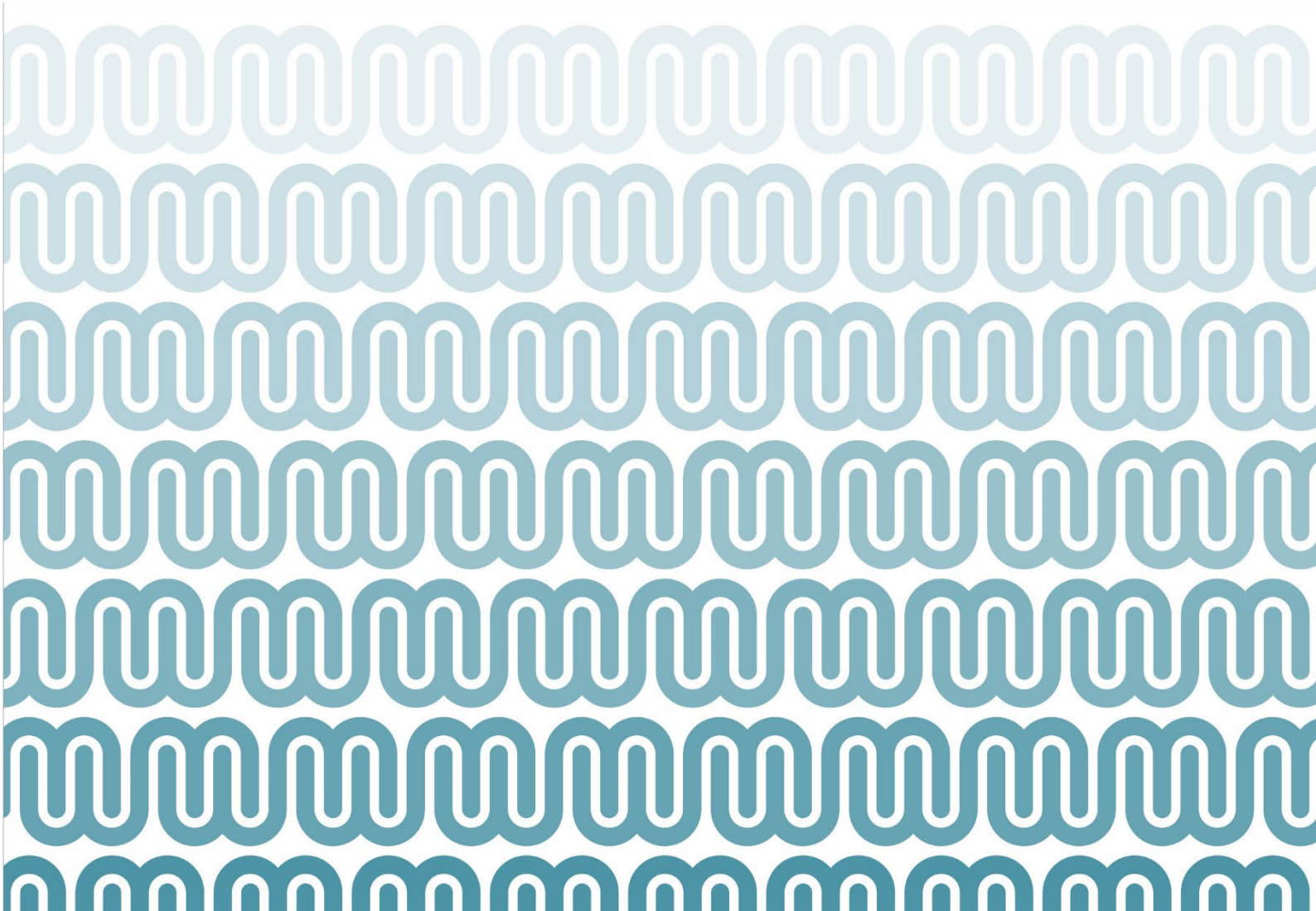
mental welfare commission for scotland

Whistleblowing report 2025-26

Report

October 2026



Our mission and purpose

Our Mission

To be a leading and independent voice in promoting a society where people with mental illness, learning disabilities, dementia and related conditions are treated fairly, have their rights respected, and have appropriate support to live the life of their choice.

Our Purpose

We protect and promote the human rights of people with mental illness, learning disabilities, dementia and related conditions.

Our Priorities

To achieve our mission and purpose over the next three years we have identified four strategic priorities.

- To challenge and to promote change
- Focus on the most vulnerable
- Increase our impact (in the work that we do)
- Improve our efficiency and effectiveness

Our Activity

- Influencing and empowering
- Visiting individuals
- Monitoring the law
- Investigations and casework
- Information and advice

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Executive summary

During 2025-26, the Mental Welfare Commission for Scotland (the Commission) established formal whistleblowing arrangements following clarification from the Independent National Whistleblowing Officer (INWO) that the organisation falls within the scope of National Whistleblowing Standards.

Significant activity was undertaken to develop policies and procedures, appoint Confidential Contacts and a Board Whistleblowing Champion, establish governance and reporting arrangements, deliver training, and raise staff awareness.

No whistleblowing concerns were raised during the reporting period and all quarterly returns submitted to INWO recorded nil cases.

The Commission will continue to focus on awareness raising, staff confidence and the ongoing embedding of whistleblowing arrangements during 2026-27.

Introduction

The Commission is committed to fostering an open, transparent and supportive culture in which staff feel confident to raise concerns about wrongdoing, risks to public safety, malpractice or other matters in the public interest.

Following clarification received from INWO in early 2025 that the Commission falls within the scope of whistleblowing requirements, the Commission undertook a comprehensive programme of work to develop and implement formal whistleblowing arrangements. This followed previous INWO advice received in 2021 which had indicated that these requirements did not apply to the organisation.

As 2025-26 represents the first year of implementation, activity has principally focused on establishing governance arrangements, developing policies and procedures, training key personnel, and raising awareness amongst staff. The new arrangements became operational in January 2026.

Implementation

During 2025-26, the Commission completed a number of key actions to establish its whistleblowing framework:

- Developed, approved and published a Whistleblowing Policy, Whistleblowing Procedure, and supporting staff guidance leaflet.
- Invited expressions of interest from staff and appointed three Confidential Contacts (CCs) from outside the management structure, providing staff with independent sources of support and advice.
- Appointed a Whistleblowing Champion at Board level to provide oversight and assurance regarding the effectiveness of the arrangements.
- Secured formal Board approval for the Commission's whistleblowing framework and reporting arrangements.
- Commissioned mandatory whistleblowing training for all line managers and CCs, achieving a 100% completion rate.
- Launched a new intranet platform containing a dedicated whistleblowing section, providing staff with easy access to policies, guidance and resources.
- Established quarterly reporting arrangements and submitted the Commission's first whistleblowing key performance indicator (KPI) return.
- Developed arrangements to ensure continuity of Board-level oversight, including succession planning for the Whistleblowing Champion role ahead of the current member's term ending later in 2026.

Awareness & culture

Recognising that effective whistleblowing arrangements depend upon awareness, trust and confidence, the Commission undertook a range of activities to promote understanding of the new arrangements and reinforce a positive speak-up culture.

These activities included:

- Organisation-wide launch of the whistleblowing policy, procedure and staff guidance in December 2025.
- Production and distribution of awareness materials at the All Staff Conference held on 1 April 2026.
- Promotion of the new national guidance for NHS staff on speaking up in NHS Scotland.
- Signposting staff to relevant training opportunities and support resources.
- Establishing regular engagement between the Head of Culture and Corporate Services (HOCCS) and CCs through quarterly meetings.
- Holding a six-month review meeting between the Chief Executive, HOCCS and the Board Whistleblowing Champion to consider progress and identify any emerging issues, with a commitment to continue these meetings on a six-monthly basis.

Whistleblowing activity

The Commission began submitting quarterly whistleblowing KPI returns during 2025-26.

No whistleblowing concerns meeting the definition of a whistleblowing concern under the National Whistleblowing Standards were raised during the reporting period. Accordingly, all quarterly returns submitted to INWO recorded nil returns.

Measure	Result
Concerns received	0
Stage 1 cases	N/A
Stage 2 cases	N/A
Referrals to INWO	N/A
Cases upheld	N/A
Cases partially upheld	N/A
Cases not upheld	N/A

While no concerns have been raised through the formal whistleblowing process, the Commission recognises that the absence of reported concerns does not in itself provide assurance regarding organisational culture. The Commission will therefore continue to focus on awareness-raising, staff confidence and accessibility of reporting routes to ensure that employees feel able to speak up should concerns arise in the future.

Key Performance Indicators

KPI	Result
Learning and improvement	New framework established
Experiences of participants	No cases; ongoing engagement with CCs
Staff awareness and training	100% completion for managers and CCs
Total concerns received	0
Concerns closed Stage 1	N/A
Concerns closed Stage 2	N/A
Outcomes	N/A
Average response times	N/A
Extensions Stage 1	N/A
Extensions Stage 2	N/A

Learning & improvement

While no whistleblowing concerns were received during the reporting period, significant organisational improvements were made through the implementation of the Commission's whistleblowing framework. These included:

- the introduction of clear reporting routes for staff;
- the development of supporting guidance and resources;
- establishment of Confidential Contact arrangements;
- implementation of governance and reporting processes;
- delivery of role-specific training;
- introduction of additional questions on speaking up in the annual staff survey; and
- enhanced organisational awareness of speaking up and whistleblowing.

These improvements provide a strong foundation for ensuring concerns can be raised and addressed appropriately should they arise in the future.

Governance

Robust governance arrangements have been established to support the effective operation and oversight of whistleblowing within the Commission.

Quarterly whistleblowing reports are prepared by HOCCS and/or the Information Governance Manager. These reports are considered by the Executive Leadership Team (ELT) before being submitted to the Board for review and approval.

Following Board approval, reports are shared with CCs and submitted to INWO in accordance with reporting requirements. No whistleblowing reports or returns are published externally without prior Board approval.

The Board Whistleblowing Champion provides additional independent oversight and assurance regarding the effectiveness of the arrangements, supported by regular engagement with the Chief Executive and HOCCS.

Priorities (2026-27)

The Commission remains committed to embedding and developing its whistleblowing arrangements. Key priorities for 2026-27 include:

- Delivering targeted awareness-raising activity during Speak Up Week in September/October 2026, aligning with the fifth anniversary of the introduction of the INWO standards.
- Continuing quarterly engagement meetings with CCs to review learning, support requirements and awareness activity.
- Maintaining six-monthly meetings between the Chief Executive, HOCCS and Board Whistleblowing Champion.
- Monitoring the effectiveness of the new arrangements through quarterly KPI reporting and governance processes.
- Continuing to promote a culture of openness, learning and psychological safety, ensuring staff understand how concerns can be raised and the support available to them.

Conclusion

2025-26 has been a foundational year for whistleblowing within the Commission. Significant progress has been made in establishing policies, governance arrangements, reporting processes, training and awareness activities in line with applicable requirements.

No whistleblowing concerns were raised during the reporting period. Nevertheless, the Commission has established a comprehensive framework designed to ensure that any future concerns can be raised, considered and addressed appropriately, and will continue to focus on maintaining staff awareness and confidence in the arrangements throughout 2026-27.

Assurance statement

As Board Whistleblowing Champion, I am satisfied that appropriate whistleblowing arrangements are in place and that the Commission has made significant progress in implementing the requirements of the National Whistleblowing Standards during 2025-26.

While no whistleblowing concerns were raised during the reporting period, the Commission has established robust governance, reporting, training and awareness arrangements to support a culture in which staff feel able to speak up and raise concerns in the public interest.

Cindy Mackie

Board Member and Whistleblowing Champion