

27th March 2023

Dear Prime Minister,

We write to you on matters relating to the proposed Office for the Whistleblower(OWB) to raise serious concerns about both this law and the conduct of the APPG on whistleblowing and its secretariat, WhistleblowersUK. The issues we raise fall into the following two categories;

.The Misconduct involved.

.Why the proposed law, OWB, will fail abysmally.

The Misconduct

A prime example of the routine dishonesty, last week WBUK issued a press statement to the national media regarding evidence they rely on for the OWB, fortunately most of the media ignored this or more members of the public would have been deliberately misled, The Express published this statement from WBUK,

“About 3,000 people called a whistleblowers hotline last year in a bid to expose record levels of fraud, corruption and malpractice, The daily Express can reveal. They bombarded Whistleblowers UK to report wrongdoing in police forces, the NHS, Government,

financial services and other major institutions and sectors”.

WBUK have **no** phone number, we have been pointing this out for some time. WBUK reacted to our criticism by putting someone else’s temporary number on their site but only for a short period some time ago. Any investigator accessing the WBUK website analytics will easily confirm this fact.

The data is also clearly a lie, to receive record levels of calls (to a non-existent hotline) about fraud and corruption specifically, you would have to receive a much higher number of calls overall because the percentage of cases involving fraud and corruption is much lower than for example, social care or NHS cases involving concerns about patient care.

At the time this non-existent helpline was allegedly “*Inundated*” WBUK were constantly appealing for whistleblowers evidence to support their OWB.

You will see from reading the “*office for the Whistleblower*” Report on the proposed law, that the secretariate had evidence from barely **2000** individuals, most of whom were **not** whistleblowers at all.

There is also the fact that whilst being inundated with all these cases last year, they closed the organisation for the summer of 2022.

This is just one of many blatant lies, this kind of conduct damages the cause of protecting whistleblowers, an issue which is about truth telling after all.

It’s also highly distressing for whistleblowers who in the past contacted WBUK via their on-line form, which harvests whistleblowers data under the pretext of promising support, the low paid were never contacted back, leading to whistleblowers not getting

the advice they needed to stop abuse. In a number of these cases the abuse of vulnerable people continued unchecked as a direct result. We find this to be completely unacceptable.

Those whistleblowers who were higher paid were contacted back and asked to sign the notorious WBUK contract. A document passed to us by all this category. Please note this contract has also been brought to Dr Minh Alexander attention by whistleblowers.

This contract asked for £100 per hour and a considerable slice of any compensation obtained. This contract has never appeared on the WBUK website, in effect WBUK were operating a covert claims management business which is unlicensed, so no redress for their clients should things go wrong.

Georgina Halford Hall the CEO of WBUK, and secretariat to The APPG on Whistleblowing is a parliamentary pass holder and in a position of public trust, she is training MPs on Whistleblowing.

A number of anonymous twitter accounts are also linked to WBUK. These accounts are used to regularly mislead the public or to harass whistleblowers who question WBUK.

There is no question as to the access and influence she has been allowed. What is staggering is the fact this individual and her organisation have harmed **more** whistleblowers than any other UK business.

Laundered Vested Interest Cash

We have also asked over a hundred times for the WBUK Financial records to be published in vain. Company House list the filleted accounts of WBUK, which never show more than two thousand pounds. Whilst filleted accounts are entirely legal and acceptable for an ordinary company, for a company acting as secretariat

to a parliamentary group they are a loophole that allows blatant misconduct.

WBUK have **laundered** the vested interest cash from at least two of the US law firms exposed in the US scandal as having syphoned off likely hundreds of millions from the US whistleblowing programmes,

[The Whistleblowing Industrial Complex](#)

The legal and compliance companies whose idea of lucrative whistleblowing law is the OWB are the funders of WBUK. How much money, over what period of time? We the public are denied access to this information. Sir Norman Lamb resigned from the APPG on whistleblowing publicly citing WBUKs lack of transparency as they refused to disclose this information.

Is this democracy? No, it's crony capitalism subverting democracy for their own ends.

Some simple but startling facts about our campaign for Edna's Law,

Edna's Law is underpinned by evidence from **10,000** Whistleblowers from two decades of hard work running a genuine national helpline.

Edna's Law is supported by over **7,000** members of the public on change.org.

Edna's Law is also supported by the evidence from **23,000** individuals who have provided us with witness statements regarding their experiences with regulators, ombudsmen, safeguarding and professional bodies. This evidence will be published in three volumes, the first volume is being prepared now.

*Please note this evidence completely contradicts everything the OWB relies on as for investigation purposes and remedy.

In contrast the **OWB**

OWB petition supported by **166**.

OWB relies on evidence from **2,000** some of whom are whistleblowers, but **most** are employers, regulators, lawyers, and academics who make a living from whistleblowing.

The above facts say it all, it does not matter how much support or evidence you have, what matters is how much money vested interests are willing to throw at an APPG. Money gives you a voice in UK parliament, that's what influences law change. This is not a perception, it's a **fact**.

Please do not think about telling us to go to the **parliamentary commissioner for standards** because **all** these issues have already been brought to their attention without comment from them. We also submitted to the inquiry into APPGs, all our evidence was censored from the official record. The system in place protects the wrongdoing that is why public trust in our political system lies in tatters.

We are so grateful to Private Eye magazine and the documentary film crew who have filmed the following in real time, the malicious attacks on us by WBUK, sanctioned by the APPG on Whistleblowing; attacks which included malicious allegations to the Charity Commission, who are now themselves under police investigation for Misconduct in a Public Office.

The Charity Commission had to publicly apologise to us after we were politically targeted including an attempted SLAPP on the book about Edna's Law.

We were attacked in the middle of the pandemic, whilst coping with a 60% increase in helpline calls.

Unlike WBUK Our helpline data is evidenced, and we were the only UK charity to publish 42 real time helpline data reports during Covid.

In the UK, a charity who validly challenges a parliamentary group using factual evidence is not to be tolerated and must be permanently silenced. A culture and conduct that Vladimir Putin would heartily identify with.

Why the OWB will fail.

This is just a brief summary, there is full evidence on our website.

The OWB relies on regulators to investigate. These regulators are already miserably failing whistleblowers and the public. The evidence from 23,000 clearly shows this.

The OWB want to make everyone a whistleblower, the sheer stupidity of this will only have one result, the genuine whistleblower will be lost in the deluge of calls from example the following, *last year's data.

15,078 NHS medical negligence

83,899 HCHS complaints

541,535 reports of abuse safeguarding adults

The above numbers are the last years data. Add to this tens of thousands of people who think whistleblowing includes the following,

They can't get A GP appointment.

Can't find an NHS dentist.

Think the bloke next door is committing benefit fraud.

In this deluge the genuine whistleblower will be completely lost, time sensitive disclosures such as

people who are already dying of thirst only have hours to be identified and acted on.

Over 95% of whistleblowers contacting our helpline have already reported their concerns to regulators and other authorities and the abuse and neglect continues and that's why they contact us. Running a helpline for genuine whistleblowers is a real responsibility because you are dealing with life-or-death issues hourly.

There is absolutely nothing in the proposed OWB that will protect whistleblowers, it is an unmitigated disaster waiting to happen. Please do not wait for people to start dying before you act.

The OWB has sought out a small number of high-profile whistleblowers such as Dr Chris Day. We are not attacking Dr Day but we are simply pointing out that Dr Day has no helpline experience of whistleblowers.

Dr Day has no experience of whistleblowing outside the NHS at all.

His public statements on OWB are highly concerning and to be honest completely ignorant of the wider issues, affecting all sectors.

Dr Day seems completely oblivious to the fact that most whistleblowers are from very low paid roles, he has no understanding of what it's like for whistleblowers reliant on foodbanks to feed their families. These whistleblowers are starved out of any protection very early on. They cannot access the law.

Dr Day recently commented that OWB would take whistleblowing out of Tribunals, he then stated if the OWB fails a whistleblower they can take their case to a first tier Tribunal. They would just end up in another Tribunal.

Dr Day wants to protect NHS whistleblowers however this flies in the face of the rule of law, if a law

is to protect or prosecute a specific group of people, if must protect or prosecute with equity. You cannot protect just one group of workers whilst denying any legal protection to others.

WBUK and the APPG have gathered a particular class of whistleblower around them, those who are doctors in particular. Yet **most** whistleblowers are not professionals at the top of their profession, with a buffer of savings or an ongoing income to soften the harsh reality of having no money for basics such as food, these whistleblowers are left to navigate the harsh and often insurmountable obstacles on the path to obtaining any redress or accountability.

There is a real class issue surrounding whistleblowing, those supporting WBUK tend to be doctors some of whom arrogantly think their whistleblowing is most important. All whistleblowing is **equally** important,

Ambulance drivers

Cleaners

Social Care staff

Teachers

Classroom assistants

Fire Fighters

The list is endless. Regardless of the **who** is blowing the whistle. We feel saddened that some doctors in particular are doing so much harm to the cause of protecting whistleblowers equally, whether motivated by arrogance or ignorance the harm caused by supporting OWB is considerable.

The OWB will be run from the fines placed on financial institutions, are we really to believe that for example ten whistleblowing cases, nine from low

paid front-line staff, which will bring in nothing for the OWB will be treated with the same urgency as the one case that will likely secure a large amount of money from a fine on a financial institution?

When regulators are failing whistleblowers and the public, the last thing you need is another regulator to regulate the regulators and another and around the vicious circle goes.

We ask for a full investigation by an individual acceptable to both of us. We ask that The APPG on whistleblowing be suspended along with the proposed OWB, and we ask for full accountability.

There needs to more public involvement with parliamentary standards.

These events must never happen again. You have much to say about public standards, transparency, and democracy, now is the time for your actions to match your words.

Eileen Chubb

This letter is published in line with our policy on transparency.

