

Democracy?

**What Vested Interest Cash Can
Buy and at What Cost to The
Public Interest?**

By Eileen Chubb ©

Compassion In Care

The Whistler

Democracy?
What Vested Interest Cash Can Buy
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For two decades we have been responding to proposed laws that affect our beneficiaries, challenging adverse proposals when required, but we have never encountered the scale of dishonesty, malice, greed, and risk to the public as that posed by the agenda of APPG on Whistleblowing and its secretariat WBUK. (WhistleblowersUK) We have repeatedly raised these concerns with all involved in this APPG, all have declined to comment, including WBUK. We have also raised these concerns with The Standards Commissioner, The Standards Select Committee and submitted evidence to the select committee inquiry into APPGs. Our evidence was suppressed in their subsequent report.

Introduction

The public interest is at the core of whistleblowing but what happens when those dictating whistleblowing law are primarily concerned with serving the interests of the government first?

I have used the document, **The Whistleblowing Bill Report** because this document demonstrates so well the core agenda of The APPG on Whistleblowing, WhistleblowersUK (WBUK) its directors, its funders, and associates.

The main linchpin of **Whistleblowing Bill** is how much money the government will save if they protect financial whistleblowers first and foremost. The bill proposes “ The office for the whistleblower” whom we shall refer to as **(OFTW)** a Government entity answerable to parliament.

The **OFTW** will be financed by the big fines levied on financial institutions and public bodies as a result of whistleblowers specifically reporting fraud, corruption, and waste to the **(OFTW)**

The **OFTW** is completely compromised because clearly it is completely skewed in favour of financial whistleblowers. If ten whistleblowers

contacted the **OFTW** for example. 9 were from other sectors, such as retail, social care, or the probation services, but one whistleblower was from the financial sector with information that would result in the **OFTW** being able to levy a huge fine on a financial institution, would of all those ten whistleblowers be protected equally and be given the same priority?

The **OFTW** would of course give priority to the one whistleblower whose information would pay the wages of the **OFTW**.

Anyone reading the details of **The Whistleblowing Bill Report** will see that almost every page of that document refers to the billions that would benefit the Government in savings from fraud and corruption.

It is worth noting that, for example, Government Departments that deal with tax and benefit fraud already have phonelines that allow members of the public to report fraud, we are told there is a long waiting time for those contacting these phonelines due to how busy they are. The Government clearly need to invest more resources into this area as there is no shortage of members of the public willing to freely give information. This is not whistleblowing.

If a member of the public saw a child being abused and rang the police or social services and asked, *“What money will you pay me if I tell you about a child being beaten and starved?”* Most people would be appalled at such thinking, but this is the essence of bounty law.

The first thing the **OFTW** will do is get US bounty law enacted in the UK. The word “whistleblower” will be tarnished with self-serving greed and genuine whistleblowers will suffer the consequences.

Please do not take my word for it, read the **Whistleblowing Bill Detail**. The core of which centres around this agenda, how much money can be saved by protecting financial sector whistleblowers.

The Whistleblowing Bill Details, Page 7

£190 BILLION

LOST TO FRAUD PER YEAR

£40 BILLION from taxpayer

£7 BILLION FROM INDIVIDUALS

£140 BILLION From Private business

Throughout the **Whistleblowing Bill** Report, the priority is the money that can be saved and therefore be funnelled via fines and justify the existence of **OFTW**. There is not a single reference to whistleblowing cases that will result in the Government or any organisation having to **pay out** money, for example,

- . Train drivers reporting cost cutting working practices that put the public at risk.
- . Care staff reporting a national care company who were making profits by cutting staff numbers, not supplying vital equipment, or cutting the food budget,
- . Probation officers reporting dangerous cost cutting that put the public at risk.
- . Civil servants reporting the government for fraud and corruption.

There are hundreds more examples that we could give from our helpline data, the key thing in [Ednas Law](#) is that it would protect all whistleblowers equally, regardless of whether their disclosures were going to **save** or **cost** an organisation or the government money.

The inference is also made in the whistleblowing bill report, that all the billions the government saved by protecting financial whistleblowers could be spent on public services. This is highly insulting and amounts to telling the public and whistleblowers from other sectors, that their concerns and detriment does not matter as the government may throw a few crumbs at the other issues and they should be grateful.

The **OFTW** is a vehicle for filtering welcome or convenient whistleblowing and containing and suppressing all inconvenient information.

This report exposes a scandal by,

- . Challenging the agenda of the APPG on Whistleblowing and WBUK, with hard evidence,
- . Exposing how such a dangerous agenda was able to be gain such purchase in our parliament.

- . Exposing how parliamentary loopholes have allowed vested interest money to influence law to such a degree, that democracy and the integrity of our parliamentary system have been brought into disrepute.
- . How vested interest money can be laundered via an APPG secretariat who both funds the said APPG and pays for the promotional bandwagon that promotes the funder's agenda, whilst never declaring a penny of where the vested interest cash came from, how much and how often.
- . How a law that will actively harm genuine whistleblowers and be responsible for loss of life, avoidable risk, abuse of vulnerable people, miscarriages of justice and much more can gain purchase in parliament without a single challenge from **inside** parliament.
- . How malinformation/misinformation is used to deliberately mislead and exploit the public and the media
- . What happens to those who challenge this agenda from **outside** parliament, how those acting as public officers misuse the assets of the state to silence all challenge and dissent.

We will conclude this section by dedicating this report to

Zara Aleena; 35 who was viciously raped and murdered by Jorden McSweeney a violent racist, with 69 previous convictions including assault. A damning report into probation services found that McSweeney should have been assessed as high risk, not medium risk, thus saving costs. The inquiry also highlighted government failings to properly resource the probation service.

Terri Harris 35 her unborn child, her son, daughter, and their friend

Lacy Bennett 11

John Paul Bennett 13

Connie Gent 11

All viciously murdered by Damian Bendall a racist psychopath after a series of failings within the probation service, who wrongly categorised Bendall as a "Low Risk".

Our deepest condolences to all those affected by these damning failures.

These are just two of many cases every year where the public have lost their lives or suffered serious harm because of such failings.

These victims could so easily have been our mothers, fathers, sisters, brothers sons or daughters. **This is the public interest.** This is what is at stake.

The government could have put right the lack of resources in the probation and prison service, but that would have involved spending billions and the government do not welcome that kind of whistleblowing.

We pay tribute to all those working in probation who have raised these very same issues and lost their jobs for doing so, our lives depend on whistleblowers being heard. **Whistleblowing** is not a legal case, its about putting **right** issues that will cost lives if not acted on.

We will only truly protect whistleblowers and change culture when the law is blind to whether whistleblowing disclosures save billions or cost billions, when lives are at stake, lives are the priority. This is why Edna's Law is called a people's law.

Michelle Sweeny, Probation service whistleblower; extract from the investigation by the organisation [Truth Defence](#)

“Michelle was a probation officer working at one of the Community Rehabilitation Companies (CRC) after the part privatisation of the probation service in 2014. Under the 'Transforming Rehabilitation' programme high risk offenders were to be monitored by the remaining state-run Probation service, while lower risk offenders were handled by the CRCs.

Despite many years of experience, after being moved to a CRC Michelle claims that she was finding her work increasingly stressful and difficult to complete. She claims this was because her CRC was downgrading the risk profiles of her offenders so that they could allocate less staffing resource to such cases compared to what would be required for higher risk offenders.

As an experienced probations officer, Michelle soon came to believe that medium risk offenders were being categorised as low risk and, most disturbingly, high risk offenders - who should have been handled by the National Probation Service - were being downgraded to medium risk and handed to CRCs.

Michelle says that she was initially concerned about causing a panic amongst the public, so she tried to deal with the issue through internal processes for a year. She

was forced to look outside the probation service when these efforts led nowhere, and she became very concerned about the possible implications and risks to public safety.

Michelle explained the immense pressures she experienced at this time, describing it as 'literally like drowning'. She eventually made contact with WBUK but claims she was all but ignored and was subsequently contacted by a personal injury law firm. After what seemed to her like an ambulance-chaser call, Michelle left feeling despondent at the lack of support for whistleblowers and subsequently warned others about her experience with WBUK.

A few months after Michelle had tried to blow the whistle through WBUK and before she had succeeded in doing so, a young man was killed by an early release offender. According to Michelle, this followed exactly the downgrading of risk profile that she was trying to expose with the help of WBUK. Michelle subsequently made contact with Eileen Chubb, founder of Compassion in Care. In 2015 Eileen helped Michelle get her story out and give evidence to MPs in parliament. Several years after she had first tried to blow the whistle Michelle's claims were vindicated by the probation inspectorate which found that "over-worked staff had avoided giving offenders the highest 'red' risk rating because they did not have the resources to undertake the level of contact and supervision this required.

Along with her testimony to MPs, this proved pivotal in a reversal of the privatisation policy with the government announcing in May 2020 that the entire probation service would be taken back into public hands.

Michelle's story illustrates the type of whistleblower and whistleblowing that may offer relatively little in the way of financial reward, but enormous public interest value. The fact that her case appeared to have attracted minimal interest from WBUK raises serious questions about its efficacy and integrity as a not-for-profit organisation committed to the support of whistleblowers at the earliest stage of making their disclosures. Perhaps more importantly, Michelle's story is a reminder of just how essential it is in some contexts for whistleblowers to go public in order to deliver meaningful accountability or reform.

The failures that she and some of her colleagues were trying to draw attention to were, by their nature, systemic. As such, it is not surprising that a year spent on trying to blow the whistle 'internally' did not bear any fruit. In sum, our report has highlighted a number of areas in both the culture and practice".

Those staff like Michelle, who were highly experienced and cared were lost and the negligent lack of resources in the probation service can be laid at the government's door. This whistleblowing will **cost** billions, were it acted on,

yet WBUK and its APPG continue to highlight only the billions in **savings** to the government.

*We are very grateful to the organisation Truth Defence, for their independent investigation.

Probation Whistleblower Aiden

“ The probation service has been destroyed by a lack of government funding, lessons are never learned, it makes me so angry, the harm done by privatisation and continues to be done by a dangerous lack of investment. You may as well bang your head on the wall as raising concerns is going to result in hostility”.

The above cases show you exactly what is at stake; the dangerous agenda of WBUK, The APPG on whistleblowing and their funder's agenda is to make massive profits from whistleblowing law. What the readers of this document have to decide is the following,

. Do you believe that laundered vested interest money should be allowed to influence UK whistleblowing law?

. Are you willing to gamble the future safety of your daughter, mother, son, sister, or any family member, by not standing against this greed driven agenda today?

Section One Funding

When the APPG on whistleblowing was first set up, the secretariat role carried out by WBUK was funded by the US pro bounty law firm, **Constantine Cannon**. This was declared in the register of interests.

There was rightly much outcry over this as it was clearly wrong that a company like **Constantine Cannon** played any part in influencing UK whistleblowing law. This law firm played a key role in drafting the US whistleblowing legislation and are on the public record as lobbying for the US bounty system in the UK .

Within a few months of the Whistleblowing APPG being set up, its chair Sir Norman Lamb, publicly resigned, citing the lack of financial transparency of WBUK as the sole reason.

The recent [Westminster Accounts](#) story by Sky News and Tortoise showed that WBUK had given 64k to the APPG on whistleblowing, making WBUK the largest funder of the APPG on whistleblowing.

WBUK have only ever produced filleted accounts showing no more than two thousand pounds. While it is perfectly legal for any ordinary company to produce such accounts but when it's a company that is acting as a secretariat in parliament it is completely wrong.

WBUK have received funds from the compliance company **Navex Global**, the US Pro bounty Law firms **Constantine Cannon and Kohn Kohn, Colapinto**. There would have been outrage if these firms had funded the APPG directly, so instead they laundered this vested interest funding via the conduit of the APPG secretariat WBUK.

This covert laundering of vested interest cash used to run WBUK and the APPG on whistleblowing denies the public crucial information such as,

Who are all the funders of WBUK?

How much money is involved?

What percentage of WBUKs overall income is from vested interests?

Were WBUK specially set up as a vehicle in order to carry out a specific agenda and disrupt and silence all dissent or challenge to these funders agenda?

We have long raised evidenced concerns that WBUK were in fact a sham whistleblowing organisation, based on the evidence of **52** whistleblowers who contacted our helpline with concerns about WBUK.

To briefly summarise these concerns, it was clear that WBUK were doing only just enough to preserve the image of a whistleblowing support organisation.

They did not respond to helpline cases that involved low paid staff.

There was a clear pattern that WBUK preferred whistleblowers who were able to pay their fees.

It emerged that WBUK were asking staff from higher paid roles to sign a contract agreeing to pay WBUK a £100 per hour for any help plus a percentage of any compensation they may be awarded.

The WBUK contract did not appear on their website, which gave the impression that WBUK was a whistleblower support organisation and to have put a copy of this contract on their website would have clearly showed them to be a claims management service (unregistered), so no redress for their clients should things go wrong.

*Please note that our concerns re US whistleblowing law were fully vindicated in a shocking report by Professor Platte of Kansas Law school, [The Whistleblowing Industrial Complex](#)

Professor Platte exposes an obscene gravy train of profit being made by a tiny group of lawyers, who had also been instrumental in drafting US whistleblowing law, two of these firms named, **Constantine Cannon and Kohn Kohn Colapinto**.

Some may argue that it is ok for lawyers to take a specific percentage of compensation, but **not** if these same lawyers were instrumental in drafting a law that not only allowed them to take a massive percentage of big pay-outs, but a law that failed 99% of whistleblowers leaving the majority destitute and unprotected.

When lawyers draft a whistleblowing law in order to make huge profits for themselves it is bad enough, but when they draft a law that deliberately disadvantages 99% of whistleblowers in order to make big profit from the 1%, then this is injustice of the worst kind. It is absolute contempt for the rule of law.

In 2015 the WBUK website had already stated its objective as being The Office for The Whistleblower, but in 2022 WBUK stated after allegedly consulting Whistleblowers, the concept of Office for the Whistleblower was first created as an idea.

In 2016 we predicted that WBUK would attempt to make whistleblowing law a global law as the financial sector was global and that's where the profit in bounty law would be found.

In May 2018 the WBUK directors, Mr and Mrs Halford Hall, registered a subsidiary company called Whistleblowers International.

In April 2022 the directors of WBUK and the APPG on Whistleblowing called for a global Whistleblowing law.

We have repeatedly asked for all WBUK and its directors accounts to be independently investigated; this has been ignored. We know about some of the laundered vested interest cash, we know the agenda of the funders. The next section will look at what this vested interest cash has purchased in parliament. The key point to note is that their agenda will actively harm whistleblowers and those whose lives depend on whistleblowers.

This is not an APPG on real ale or some other harmless issue that at most can promote one beer brand above another brand. This is about Whistleblowing, the difference between life and death, safety or harm, grief or happiness, justice, or injustice, right or wrong.

Parliamentary Rules on APPG Funding

32. Each group's Chair and Registered Contact is responsible for ensuring if any person or organisation provides a secretariat or support services, that person or organisation is aware of and complies with the rules of the House. In particular, if a consultancy provides such services, and the value of those services exceeds the threshold for registration, it must be prepared to disclose information about its clients; if a charity or other not for profit organisation provides such services, it must be prepared to disclose information about its donors. The organisation providing the services must either publish this information online as a matter of routine or make it available within 28 days if any person or organisation asks them to do so. The information which must be made available is as follows:"

"Sources of funding

25. An APPG must identify sources of external funding on its headed paper; or must include on it a link to the Register or to a website where those sources are listed.

"MPs' and Peers' staff who have a parliamentary security pass must record in the appropriate Staff Register any benefit which they themselves receive from, or because of their association with, an All-Party Parliamentary Group, subject to the financial thresholds applying to that Register".

My Response; When we raised these issues, we were told by the Parliamentary Commissioner for standards that WBUK were not breaking any rules by failing to disclose their funders.

WBUK are neither a consultancy nor a charity. You may as well take the parliamentary rule book and throw it in the Thames.

We have repeatedly asked for WBUK and its directors accounts to be disclosed, these requests, over 30 so far, have been completely ignored. If something is not wrong, then why go to such extraordinary lengths to conceal it?

It's also worth noting that former member of the whistleblowing APPG, Stephen Keir and former MP Tessa Munt are now part of WBUK and presumably its future profitability.

Section Two

Malinformation, Disinformation

Many of you will be aware of the “Online Harm Bill” which is aimed at website and social media providers in recognition of the harm that can be caused by “Disinformation” or other harmful content. But what happens when such harmful disinformation is being published by a parliamentary group? The answer is nothing happens. The old adage “One rule for us and one rule for them” is the reality.

There are plenty of rules and principles in the Parliamentary rule book and at least some of those rules sound impressive but, they are no more than empty words. Those of us who have ever tried to raise valid evidenced concerns know there is absolutely no route of redress or meaningful accountability at all.

This is why our political institutions have hit rock bottom; the greed, corruption, dishonesty, and blatant deceit that we see today in our political system, is the result of years of complacency, abuse of power and lack of accountability.

But what happens when the concerns being raised about parliamentary standards have consequences that will cost countless lives, result in

immeasurable suffering and other harm? The answer is still nothing happens.

Parliamentary standards are a myth, the rulebook is there to protect the wrong doers, to justify the unjust, defend the indefensible, silence the whistleblowers and give the appearance of surface parliamentary standards to the public. What is staggering in this case is that the concerns raised are about all of those involved with the All-Party Parliamentary Group on **whistleblowing**.

The APPG on whistleblowing website is littered with blatant disinformation, far too much to include in this report, so I have taken their most recently published document "*The Whistleblowing Bill Report April 2022*" to demonstrate this.

The APPG on whistleblowing have neglected to state is that the Bill on their website fell in 2022, however they intend to get a similar version of this bill enacted and have been allowed to continue with this dangerous agenda in spite of the concerns we have repeatedly raised with government about the consequences of such a law. The linchpins of this agenda are clearly laid out in detail in the above report, which has been the basis for three attempts to pass it as law so far.

Point One We know that whistleblowers are those who raise concerns in their place of employment and to define **every citizen** as a whistleblower in law would have catastrophic consequences. This is our supporting evidence on this.

In the US Professor Platt of Kansas law school recently published evidence that the US whistleblowing programmes are inundated with thousands of tips motivated by a big bounty payment.

In short those who do not have genuine whistleblowing information have nothing to lose by having a try at the bounty jackpot. This has resulted in the genuine whistleblower being lost in the deluge of information.

The below extract is taken from a special report we did on this issue several years ago.

Example One

A retired women who we will refer to as (X) buys a product from another country and notes that the US government were not paid revenue by the company selling the product.

(X) reports this via the US whistleblowing programme and gets a reward for doing so.

What has (X) got to lose? Nothing.

What risk is there to (X) in reporting this? None.

What long term detriment is (X) likely to suffer? None

Example Two

An employee of the same company who we will refer to as (B) makes the same disclosure.

What has (B) got to lose? Everything, potentially even his life.

What risk is there to (B) in reporting this? (B) could lose his job at the very least, harassment, fear, stress.

What long term detriment is (B) likely to suffer? A lifetime of detriment, such as losing his home, his family his ability to find other work.

Whistleblowers are identifiable by the information they disclose, so (B) is at high risk of suffering detriment, and he will have to spend money he hasn't got if he wants to pursue this. Full circle to a situation UK whistleblowers have faced for two decades, stuck in a legal system at best for years or unable to access help at all. Most whistleblowers cannot access the law at all.

The US whistleblowing programmes allow any individual to make a claim.

.The system is overwhelmed, and it can take years to process a claim.

.The vast majority of those making claims are not whistleblowers at all.

.The US whistleblowing programmes are vastly biased in favour of the financial sector and a miniscule number of individuals, a few dozen, only some of whom are genuine whistleblowers who receive any payment. WBUK only see the dollar signs involved, they do not see the many thousands of whistleblowers failed every year.

.Those making claims are likely to fail if not legally represented, disadvantaging those genuine whistleblowers who may have already

suffered detriment because they raised the issue with their employer first and lost their job as a result.

.Law firms willing to invest time in making a claim, favour cases where the claimant is disclosing information of financial benefit to the government rather than issues of ethical conduct or abuse.

.There is much rhetoric from the APPG on Whistleblowing and WBUK about changing the culture within organisations by making whistleblowing the norm, however the US system completely fails to protect those whistleblowers who raise concerns internally. They will have to suffer years of hardship whilst they wait for any redress because the system is clogged with chancers with useless information motivated by greed. How does such a system benefit the genuine? How does this make whistleblowing the norm?

. The US system has led to hostility with many US whistleblowers telling us that it is, seedy and makes them feel ashamed to have to use this route. Some whistleblowers have told us they have been accused of only being interested in a pay out and had fabricated concerns in order to achieve this. It has resulted in concerns being routinely covered up because the emphasis was put on fines and payouts instead of the culture change that was needed.

. The whistleblowers information can be taken by any other individual and used to make a claim themselves, putting the genuine whistleblower at real risk of being exploited when they seek advice or support.

What would happen in the UK?

If every citizen was given whistleblower protection? Looking at one area alone as an example, safeguarding vulnerable people:

The following local authority social workers are real cases who contacted our helpline, the individual details have been anonymised and agreed, but this is evidence of the floodgate effect, where the genuine just drown.

“Safeguarding is overwhelmed every year, there are thousands of safeguarding alerts coming in, the vast majority are not genuine at all, but those that are genuine often fall through the cracks because of the sheer volume we have to deal with.”

“Do we miss the genuine abuse cases? all the bloody time. Its so bad that I do not know why we don't stick up a notice saying, don't report abuse, we can't cope”.

“ We are deluged with reports of abuse, if we had ten times the staff we would struggle to cope, in the end there are so many false reports that you cannot see the woods for the trees”.

“ We are so overwhelmed that you start to get compassion fatigue, you feel to exhausted not just tired, you would break down if you could see the few genuine cases missed in the deluge of false reports, to keep your sanity you try not to think about the few genuine reports that you miss all the time”.

Imagine the proposed **OFTW** being contacted about abuse of the vulnerable, plus every individual in the UK unhappy with their medical care including issues such as being dissatisfied such as not being able to see a GP. Then add to this the employed whistleblowers, the public in disputes with every public or private entity, staff grievances on issues that are not whistleblowing. This would result in hundreds of genuine whistleblowing cases being lost in the deluge every week.

Our helpline has supported over ten thousand Whistleblowers and just over eight thousand families of abuse victims. Both groups need to be legally protected by law, but **not** the same law, as the circumstances are completely different and lumping everyone together would protect no one.

Regarding victims of medical negligence and their families, we recently submitted re the health and social care bill, that HSIB investigations into such cases should not be kept secret as proposed. This is a specialist area that needs to be vastly improved. Medical negligence law is in place but there also needs to be legal aid available to families for legal representation and the resources for special medical reports at inquiries and inquests. These are the measures that will assist in this area, not making clinical negligence victims whistleblowers and leaving them at the mercy of a system that would absolutely be deluged with whistleblowers waiting for help.

Regarding victims of bullying and harassment, which is completely unacceptable, and people should not be subjected to such treatment. We are aware that a large number of whistleblowers suffer bullying and harassment as a direct result of blowing the whistle on other issues. We are only aware of two cases where whistleblowers raised concerns about the bullying and harassment of others.

We cannot treat every workplace genuine grievance as whistleblowing as it would lead to the same deluge of cases overwhelming HR and protecting no

one. Whistleblowing and workplace grievances cannot be lumped together. These are two very different areas.

Finally, making everyone a whistleblower would make the legal and compliance industries very rich, their potential customer base would be massively increased by such a measure. Many compliance and law firms would make eye watering profits, but at what cost to the public interest?

The abuse and suffering would continue unchecked on an unprecedented scale, this is why we campaign for Edna's Law, it will make no money for any industry, but it will put the correct value on human life, because what is being forgotten by those on the Office for the whistleblower gravy train is that every single human life is priceless.

This is just a summary of **our** available evidence on this **one** point re making every citizen a whistleblower, which is one of the core linchpins; of the WBUK and their APPG on Whistleblowing; these linchpins are,

.To give whistleblowing protection to every member of the public.

. To have a global approach to whistleblowing law

. The Office for the Whistleblower to have the power to change UK whistleblowing law and adopt the US whistleblowing system.

The following extracts are taken directly from the Whistleblowing Bill Document.

The Whistleblowing Bill Report by WBUK Page 14

“The impact of the global pandemic and conflict in the Ukraine have again demonstrated that whistleblowing cannot be pigeonholed as an ‘employment matter’. Wei Wenlieng was a Chinese ophthalmologist who warned his colleagues about early COVID-19 infections in Wuhan. He was labelled a whistleblower after sharing concerns with colleagues on social media. He was summoned to appear before the local police and was admonished for “making false comments on the Internet”. Wei Wenlieng who exposed the scale of the problems of the pandemic to the world was completely unprotected from retaliation by the state. Following his death, of the disease, his family received apologies for the attempts to silence him and he has been recognised globally for alerting the world to the dangers of what became known as Covid 19.”

In recent years there have been multiple attempts to silence those who expose corruption and other wrongdoing by whistleblowers who are not recognised as such by PIDA. A recent example of this is the volunteers working with NGOs on the Polish boarder who reported the battalion of international people traffickers who have descended on the refugees fleeing the conflict in the Ukraine. These people, many of whom are British citizens, are not protected against backlash from the international NGOs they work for or the traffickers.

Doctors reporting shortages of PPE and whistleblowers reporting furlough fraud have been amongst the targets of organisations who continue to put self-interest above the public interest. The cost of fraud during Covid is estimated to equal the amount being raised by recent tax increases.

Recently Parliament heard evidence of how technology companies respond to whistleblowers when they met Francis Haugen, the Facebook whistleblower, amid concerns about the way that profits were put above the safety of users. [25]

The APPG heard from British citizen Jonathan Taylor who had been detained for almost a year in Dubrovnik following the issue of an international arrest warrant claiming he had attempted to bribe his former employer. This allegation was found to be fictitious and an attempt to penalise Jonathan for his whistleblowing which resulted in successful convictions by the Serious Fraud Office and law enforcement around the world. The total amount of worldwide fines issued to his former employer exceed £800m. Jonathan has paid a heavy price, having lost his career and his marriage [26].

These stories are not isolated incidents of retaliation. They reinforce that whistleblowing is a global issue and needs a global solution.

The OECD in August 2021 released the following statement, “A strong culture of whistleblowing helps to identify all manner of potential threats — including some threats, such as cybersecurity risks, that might not involve employee misconduct at all. It minimizes risks and costs. Misconduct that continues for a long time will ultimately be more expensive to resolve.”

My Response. It is stated above that whistleblowing is not always an employment matter, but the evidence used by WBUK for this assertion are cases that are **all** employment cases.

Doctors reporting PPE were employed by the NHS.

Workers reporting their employer for furlough fraud were workers.

Jonathan Taylor’s case originated from his employment.

Francis Haugen was employed by Facebook.

Wei Wenlieng was employed as doctor.

It is already accepted that volunteers should be treated as employees and Edna's Law would protect British employees working abroad.

WBUK state whistleblowing is not an employment issue when clearly it happens during the course of employment. Some of the above employment cases occurred in other countries, it is highly offensive to suggest that the UK should be dictating to other countries what laws they should have when the UK have so abysmally failed to protect its own whistleblowers.

The only element of whistleblowing that is global is the financial sector and this is behind the rhetoric of "global solutions". The big money to be made by the whistleblowing industry including the companies, WBUK and WBUK International and their covert funders, is from exploiting the information of whistleblowers from the financial sector as currently happens in the US.

The Whistleblowing Bill Report Page 15 Paragraph 11

"The majority of whistleblowers believed they were simply doing their job by reporting wrongdoings believing this to be in the best interest of the organisation, enabling the organisation to solve the issue quickly."

My Response. A small number of genuine whistleblowers have given evidence to the APPG on Whistleblowing. It's clear from the above paragraph that the "majority" of whistleblowers who have given evidence were firstly in an employment situation, and secondly had used internal reporting. Yet WBUK are advocating the US bounty system, a system that bypasses internal reporting and makes no allowance for those in hardship because they raised concerns internally and lost their jobs as a result, because the US system will reward you regardless of whether you are an employee or member of the public.

The US system abysmally fails the majority of whistleblowers. WBUK continually call it a great success, because WBUK's own funders have directly exploited the same system to make at the very least many millions of dollars in profit; Professor Platte's report estimates tens of millions of dollars.

Is there a motive for WBUK and the APPG on whistleblowing which it so generously funds, to push the agenda of introducing the US whistleblowing programmes to the UK? We know there is, the evidence says there is a motive, and it's not the best interests of the whistleblower. As for the public interest, it's not even on their radar.

The Whistleblowing Bill Report Page 18, Paragraph 1

“If the Economic Crime Bill is to fully to meet its objectives, it will require the active contribution of whistleblowers. The Whistleblowing Bill will help ensure that the policy objectives of the Economic Crime Bill can effectively be achieved.”

My Response; This is a full admission of support for the bounty system, which was always the objective, and the consultation process was a charade. The economic crime bill advocates rewards for financial sector whistleblowers effectively offering legal protection to just one sector, this is against the rule of law.

When I first started campaigning for whistleblowers, it quickly became apparent that there was an insidious agenda to bring the US whistleblowing model to the UK.

“Recently Conservative Kevin Hollinrake MP former member of the APPG on Whistleblowing and author of the Economic Crime Bill said to politico. “Kevin Hollinrake MP who sits on the treasury select committee is joining forces with other lawmakers to establish an office for the whistleblower with powers to reward those who come forward with evidence of crimes such as money laundering, bank fraud and sanctions busting”

My Response; Another individual trying to influence UK law change, who has long been pro the US bounty system, is Ian Foxley, who gave evidence to Parliament in 2014 calling for the US bounty system to be adopted wholesale by the UK. He gave this evidence whilst acting as chair of the original WBUK, without the knowledge or agreement of any of the other founders, who were all completely opposed to the US system. We have full correspondence on this.

The Whistleblowing Bill Report page 16, paragraph 9

“Those with the courage and integrity to stop fraud and corruption suffer huge psychological harm.”

So, whistleblowers from other sectors do not have courage and integrity? Or is it that whistleblowers who are not from the Financial Sector are less important? This is the attitude that **OFTW** is built on, because this is the agenda of the APPG on Whistleblowing, WBUK and their funders, who will make their profits from financial sector whistleblowers.

The Whistleblowing Bill Report, Page 10, Paragraph 5

“The APPG received a significant number of reports alleging endemic internal corruption that was perceived to have permeated “right to the top of all organisations, both public and private.” Recent and ongoing reports into corruption appear, at least in part, to corroborate this allegation”.

My Response; Abuse of vulnerable is also endemic; why is this not referred to in the whole report? Skewed and blatantly biased towards the financial sector, there are countless examples of this. You could not fail to read this report and see that money, fraud, corruption are the areas blatantly favoured, with a few examples of other sectors thrown in sparingly to give the appearance of equity.

The Whistleblowing Bill Report, Page 10, Paragraph 2

“ Reports from some of the organisations who participated in the call to evidence demonstrated proactive and positive engagement with their staff and a comprehensive understanding of issues within the organisation, particularly in the cases of organisations which had adopted independent whistleblower helplines and speak-up platforms. These organisations reported higher levels of employee satisfaction,”

My Response; This is an advert for the compliance industry, compliance Organisations such as Navex Global, who feature in the book.

[There Is No Me In Whistleblower](#) which gives examples of Navex Global effectiveness running BUPA’s whistleblowing compliance. Evidenced from public reports and first-hand witness testimony, whistleblowing inside BUPA is career suicide.

The Whistleblowing Bill Report Page Paragraph 5

“A particular concern raised by whistleblowers and MPs, including the recent legal challenge led by the Chair of the APPG for fair business banking, has been about the role and accountability of regulators. Whistleblowers from within regulators came forward. One describing their prescribed person as “aloof when it comes to issues of whistleblowing”. Another said they were “deeply mistrustful” of the prescribed person, and others talked about “feeling pressurised to withdraw concerns” by the prescribed person”

My Response; Apart from the banking reference, the above statement is that whistleblowers have come forward from inside regulators. To be clear, if a whistleblower from inside a regulator, let’s say someone employed by the FCA for example, raised concerns with their employer, but those concerns were ignored, then PIDA allows a whistleblower to go to a prescribed regulator. That prescribed regulator can obviously **not** be the whistleblower’s employer!

The Whistleblowing Bill Report Page 8, Paragraph 2

15] which has recovered billions of dollars to for the US treasury and has also assisted the UK Financial Conduct Authority and Serious Fraud Office in successful prosecutions.*

My Response This data is listed as being sourced from **Constantine Cannon** note the data refers to fraud, as the financial sector is all that they are interested in.

Whistleblowing Bill Report Page 8, Paragraph 4

“The Whistleblowing Bill sets new standards that will allow organisations enough freedom to develop their own policies and practice but sets clear minimum standards that will protect the public.”

My Response; The same as PIDA, compliance industry friendly law. Not protection.

Whistleblowing Bill Report Page 7, Last Paragraph

*“13. *In 2020, the SEC awarded \$175 million in whistleblower awards to 39 persons 8 of whom were UK citizens. “*

My Response; This kind of information is all over The WBUK website and has been supplied by the Bounty lawyers that fund WBUK and covertly fund the APPG on Whistleblowing. Let's put this in perspective; say a conservative **500,000** thousand whistleblowers raised valid concerns in the US every year, only **39** were given vast amounts of money and made obscene profits for their legal representatives. Is this equal justice for all whistleblowers? What of those whistleblowers who could not obtain a lawyer or a route of redress?

39 individuals is **not** confirmation of an effective whistleblowing law, it is confirmation of an ineffective and completely unjust law.

Whistleblowing Bill Report Page 7, Paragraph 5

“Navex Global, reported that firms who employ reporting mechanisms received a median \$8 million less in fines from regulatory bodies.”

My Response; It is clearly cheaper to covertly fund an APPG in the UK Parliament then plaster advertisement Bill Boards about your company in Times Square. You get to dictate the law that will profit you by millions and get free advertising.

Whistleblowing Bill Report Page 6 Paragraph 1

“All the regulators embraced the idea of an independent office of the whistleblower. Some regulators raised the prospect of the introduction of a US style rewards scheme to improve the quality and quantity of the whistleblower information and of an increase in their budgets to be able to regulate more effectively.”

My Response; WBUK and the APPG on Whistleblowing have clearly taken a very different approach to regulators than we have.

. **WBUK** consulted regulators for their opinions of themselves.

. **Edna’s Law** consulted whistleblowers and families of abuse victims who had contacted regulators to report abuse, risk of harm and other wrongdoing.

When we did a call for evidence from whistleblowers and families about their experience of regulators, ombudsmen, safeguarding and professional bodies such as the NMC, we expected to receive several hundred witness statements; the deadline has been extended four times because the evidence keeps coming in, to date **23,455** accounts of appalling failures to investigate serious wrongdoing.

WBUK extol the ICO in particular, how incredible given we have over 2030 statements about the failures of the ICO, a number that is worth noting as it’s a number that exceeds WBUK and The APPG on whistleblowing entire evidence numbers.

A typical example of what we have been told about the ICO.

Andrea Whistleblower

“ I spent nearly a year trying to get information from my employer who used every trick in the book to withhold that information, the whole process was absolutely exhausting, I was completely exhausted when I went to the ICO, I could not believe the sheer indifference, they did not read the information I had compiled, their conclusions were the result of laziness and incompetence. The ICO completely failed me, my employer got away with covering up what was a real risk to the public”.

Edna's Law does **not** look to regulators for approval as we know that such organisations cannot be relied on whatsoever. Any law that relies on regulators will without doubt, be as much use as an egg cup to bail out a sinking ship.

[Ednas Law](#) will **not** be supported by law or compliance companies, because it will **not** make them a penny in profit, nor do we want the approval of a list of particular academics, who have benefited financially from whistleblowing law and who quite honestly are clueless about the reality of whistleblowing.

Edna's Law looks to Edna for approval and all those like her, the victims and potential victims of abuse, avoidable death, and all harm. We look to whistleblowers and grieving families. There is only one interest in **Edna's Law**, public interest not vested interest.

We will fight for justice **outside** Parliament. Whistleblowers and the families of abuse victims stand with us, the evidence stands with us, and we will **not** be silenced by those in Parliament who represent laundered vested interest money and who buy the law they want.

We will instead fight tooth and nail for the law whistleblowers and the public need, and we will not pay a single penny to MPs to be heard, because that is **not** in the interests of democracy and therefore **not** in public interest and its time that the parliament had standards to reflect the same.

The Tactics Used to Silence Truth

We are not talking about the tactics used by bad employers, we are talking about the tactics used by WBUK and the APPG on whistleblowing to silence all challenge or dissent against their funder's agenda. The perversity is that we are talking about the conduct of individuals who are supposed to be experts on whistleblowing, who are telling others how they should respond to whistleblowers.

The Whistleblowing Bill Report Page 16

“Whistleblowing and whistleblower retaliation is not confined to ‘workers’ as defined in existing legislation and can include the relatives of whistleblowers, casual witnesses, or victims of medical malpractice, many of whom find themselves the subject of scrutiny and retaliation after raising the alarm about dangers to the rest of the public or supporting someone who has. We have witnessed increasing numbers of cases where ‘whistleblowers’ or those perceived to be whistleblowers are reported to the police, their professional regulator or suffer the withdrawal of public services.”

“The person of integrity is then subjected to life-changing harm from the offender's menu of punishment: abuses of the complaints system, subjected to false allegations, isolated, bullied, harassed, intimidated, slandered, libelled, defamed, dismissed, or any combination of the above and more. Those with the courage and integrity to stop fraud and corruption suffer huge psychological harm.”

My Response; The tactics used by the CEO of WBUK Georgina Halford Hall with the full approval of the members of the APPG on Whistleblowing, who were fully informed of everything and declined to comment or take action to stop further attacks; those tactics are as follows:

Acting as a public officer holder, Georgina Halford Hall, attempted to use a completely vexatious **SLAPP (Strategic Lawsuit Against Public Participation)** to delete the book, [There Is No Me In Whistleblower](#) because it fully contradicted the agenda of all involved with the APPG on Whistleblowing. WBUK have tried to suppress a book about the public interest element in whistleblowing.

About SLAPP

SLAPPS are characterised as an abuse of the legal process where the primary objective is to harass, intimidate and silence. The department of justice describes their use as

*“A growing threat to freedom of speech and a free press. At the heart of the governments reforms is a new statutory early dismissal process to stop these cases in their tracks, allowing judges to throw out claims that lack merit, the first test is assess if the activity is **in the public interest**”.*

We challenged this attempt at a **SLAPP** and requested that WBUK provide the evidence they relied on, to make this threat. They declined to respond.

Georgina Halford Hall then misused the assets of the state to silence all challenge with a string of provably malicious allegations to the Charity Commission, in the middle of the first wave of covid, when this charity was taking a 60% increase in helpline calls, allegations that nearly brought this Charity to its knees.

The Charity Commission's conduct toward us was extraordinary and subsequently their conduct was exposed in two issues of **Private Eye**. As a result of the unwarranted attack, the met Police are conducting an investigation into Misconduct in a Public Office. We are restricted in what we can say because of the police investigation, but to summarise,

The Charity Commission told us the following **in writing**.

*“ We should **not** criticise WBUK or the APPG on whistleblowing”.*

Charities are allowed to challenge proposed laws that adversely affect their beneficiaries.

“ We should remove the book, “There is No Me Whistleblower”.

There was **no** legal basis for this,(confirmed by our lawyer) and we refused as the book was the case for Edna's Law. The Charity Commission attempted to aid and abet a malicious **SLAPP** attempt whilst being fully aware that the SLAPP had no merit what so ever.

“ We should not campaign for Edna's Law”

There was **no** legal basis for this (confirmed by our lawyer)

*“ We should **not** challenge office for the whistleblower”.*

There was **no** legal basis for this (confirmed by our lawyer)

We are more grateful then we can express to the amazing, “**Private Eye**” Magazine, who read all the evidence and featured the Charity Commission's unwarranted and extraordinary conduct in two issues of the magazine.

It is worth noting here that not many charities would have stood up to the Charity Commission for fear of repercussions, but what the Charity

Commission were asking us to do would have harmed our beneficiaries for decades to come.

The evidence shows without question that the Charity Commission targeted us with a political attack in order to aid The APPG on Whistleblowing and WBUK. The Evidence is with the Met Police who have confirmed that the evidence is strong enough to refer a case of Misconduct in a Public Office to the Attorney General.

The Charity Commission at the time was run by the Conservative Peer, Baroness Stowell. Georgina Halford Hall is a member and fundraiser for the Conservative Party.

The Charity Commission is currently run by a close personal friend of Boris Johnson, Orlando Fraser.

Georgina Halford Hall also made malicious allegations to the ICO and to police.

We have also been targeted with entirely malicious allegations on the WBUK twitter account, which stated an individual unknown to us, (with whom we have never engaged and whose tweets we have never seen) had been called an abuser by us. We were advised strongly to take legal action as we had a watertight case, but the individual is vulnerable and is being manipulated and exploited by Halford Hall and that has held us back.

However, as a result of this latest attack our helpline is now being targeted with threatening phone calls from the far right, who both this individual and WBUK are linked to.

As a whistleblower I was assaulted in my place of work and along with the other members of the BUPA 7 whistleblowers endured appalling treatment, but it is nothing compared with the tactics of WBUK, the APPG on whistleblowing and their funder's conduct.

Whistleblowers who have given evidence against WBUK have also been targeted, libelled, slandered, and had tactics such as gaslighting routinely used against them.

The individuals responsible for this conduct are not only harboured by parliament, they are protected by parliament.

Is the evidence in this document such a threat? It clearly is seen as such, if you thought that it was safe to speak truth to power in the UK, think again.

It is also worth noting that the charity Protect, saw what WBUK and this APPG were doing and could not have failed to understand the consequences and the harm to their beneficiaries but nevertheless endorsed WBUK publicly and chose to fully engage with this conduct.

All those who have vested interests in whistleblowing law should not be able to influence that law, Also, those who gain from selling compliance products to business, lawyers and academics, who have been part of this scandal, need to be removed from any position of influence.

The mafia have a code of honour that by far exceeds that of the UK parliament; the conduct parliament has condoned and the vested interests it protects are at the expense of the public interest.

We want a full independent investigation into these issues and we want robust, independent, scrutiny of the parliamentary system. In short, we want democracy in that the interests of the electorate are represented, not the interests of the highest bidder.

Eileen Chubb