



Whistleblowing in Healthcare Facilities Policy

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1. Policy Purpose and Brief

This policy outlines the Department of Health (DoH) requirements for healthcare providers to establish institutional arrangements that encourage staff to report wrongdoings without fear of retaliation. This in turn fosters trust and continuous improvement in the healthcare system.

2. Definitions and Abbreviations

No.	Term / Abbreviation	Definition
2.1	Complaint	For the purpose of this document, a complaint is defined as a statement submitted by a person affected by a wrongdoing
2.2	Crime	Any action or omission punishable by penalties stipulated in UAE laws ⁽¹⁾
2.3	Criminal report	A criminal report is defined as a statement submitted to the competent authorities (police or prosecution) informing them about the occurrence of a crime. It may be made by a person who was subjected to a crime, witnessed the occurrence of a crime ⁽²⁾ or learned about the occurrence of crime.
2.4	Ethical Breach	An action or omission that violates fundamental ethical values and standards. ⁽³⁾
2.5	Incident	Any event or circumstances that could have or did lead to harm, loss or damage to people, property, the environment or reputation. ⁽⁴⁾
2.6	Unprofessional behavior	An action or omission that fails to adhere to established scientific and technical principles, codes of practice or applicable standards of care. ^(3,5,6)

2.7 Whistleblower

An individual who, in good faith, reports a wrongdoing that occurred within a healthcare provider, and based on facts, knowledge, or reasonable grounds or suspicions. Whistleblowers may include healthcare providers' employees, stakeholders, or contractors.

2.8 Whistleblowing

Reporting of wrongdoing in healthcare settings. Such reporting could be through open, confidential or anonymous channels.

2.9 Wrongdoing

An action or omission that can cause harm ⁽⁷⁾ to patients, workforce members, visitors, employers, environment, public health, or the public good. It broadly encompasses ethical breaches, unprofessional conduct and criminal behaviors.

3. Policy Content

3.1 Policy Statement

Whistleblowing plays a pivotal role in identifying areas for improvement in Abu Dhabi healthcare system, promoting the public good, and safeguarding the social welfare, rights, and wellbeing of patients and professionals. DoH expects healthcare providers to institutionalize a culture of integrity and ethics, fostered through transparency and accountability, that empowers their workforce to pinpoint any wrongdoing without fear of retaliation.

3.2 Institutional Whistleblowing Policy

3.2.1 A Whistleblowing Policy

Healthcare providers must establish an institutional policy that reflects leadership's emphasis on the fundamental role of the workforce in safeguarding the quality of healthcare services and the safety of patients. The policy shall also address risks that may negatively impact patients, healthcare professionals, providers, and society. It must underscore the importance of speaking up about actual or suspected wrongdoing. This policy can be presented as a standalone document or incorporated into a broader institutional policy, such as incident reporting and management policy, risk management policy, etc.

The policy must:

3.2.1.1 Institutionalize a culture of integrity and ethics, reinforced by transparency and accountability.

3.2.1.2 Emphasize the importance of upholding ethical principles, professionalism, and values.

3.2.1.3 Define the types of wrongdoing that must be reported and outline the mechanisms for reporting them. See **Section (2) Definitions and Abbreviations** and **Appendix (1)** for examples of wrongdoings.

3.2.1.4 Clearly communicate leadership's unwavering support for individuals who report

wrongdoing, along with their commitment to protect them from discrimination, intimidation, or subsequent retaliation.

3.2.1.5 Emphasize the duty of employees to fulfill their reporting obligations. See **Subclause 4.3.6** and **Subclause 4.3.7**

3.2.1.6 Establish arrangements to ensure the successful implementation of the policy and the achievement of its goals.

3.2.2 Policy Implementation Arrangements

3.2.2.1 Facility leadership shall ensure that effective and efficient arrangements are in place for policy implementation. These arrangements must, at a minimum, cover the following areas:

3.2.2.1.1 Organizational structure: Designate an organizational unit, such as a position (compliant officer, compliance officer, risk manager, governance officer, ombudsperson), section, a committee, or a taskforce, responsible and accountable for managing reports of wrongdoing.

3.2.2.1.2 Independence of the unit: Ensure the unit has a direct reporting line to the facility leadership or board.

3.2.2.1.3 Terms of Reference/ Operating Procedures: The unit shall operate under terms of reference or a standard operating procedure that clearly outlines how to:

- I. Carry out impartial investigation of reported allegations
- II. Ensure the confidentiality of the investigation, findings, conclusions, and recommendations.
- III. Implement necessary correction and corrective actions
- IV. Escalate or refer reported allegations to the appropriate government authorities when the flagged issue falls under their jurisdiction.
- V. Acknowledge receipt of the report and consider providing feedback to the reporter about the progress and outcome, unless doing so would jeopardize the investigation.
- VI. Manage complaints from whistleblowers about retaliatory actions taken against them for reporting wrongdoings
- VII. Manage cases where investigation determines that a whistleblowing report is false or submitted with malicious intent.

3.2.2.1.4 Staffing: The designated unit shall be staffed with qualified personnel who possess the necessary knowledge and experience to handle whistleblowing reports.

3.2.2.1.5 Processes: Robust processes must be in place for reporting and standardized management of wrongdoing reports (i.e., an effective reporting system). The reporting system must meet the applicable regulations for healthcare information and cybersecurity, and the protection of personal information. The system must provide whistleblowers with the options to either: **I)** reveal their identity; **II)** keep it confidential (i.e., their identity may only be revealed upon their consent or if it is required by law); or **III)** remain anonymous (i.e., anonymous reporting). The system must also ensure that all received reports are shared with all members of the unit rather than being handled solely by one individual.

Note: The reporting system may include an application, an email address or a dedicated

telephone line.

3.2.2.1.6 Protection: Adequate measures must be implemented to protect whistleblowers from any retaliatory acts, such as discrimination, intimidation or any form of adverse actions. Similarly, the subject(s) of the reported incident must also be protected.

3.2.2.2 All facility personnel must receive standardized training on the reporting system and whistleblowing process.

3.2.2.3 Whistleblowing arrangements must be frequently audited by the institution's internal audit team, or a third-party auditor designated by facility leadership.

4. Policy Roles and Responsibilities

4.1 Responsibilities of DoH

DoH must:

4.1.1 Ensure that healthcare facilities have a governance framework, as well as systems and processes in place to report and manage incidents including whistleblowing reports.

4.1.2 Analyze aggregated data from incidents reported through electronic incident reporting platforms and other channels, including anonymous reports, to identify potential areas for regulatory intervention and improvement.

4.1.3 Receive and manage complaints from healthcare professionals, providers, and the public.

4.1.4 Enforce compliance with this policy by all concerned stakeholders.

4.1.5 Verify adherence to the provisions of this policy through audits and inspections.

4.2 Responsibilities of Healthcare Providers

All healthcare providers must:

4.2.1 Promote a culture of integrity and ethics, supported by transparency and accountability.

4.2.2 Ensure the incident reporting and whistleblowing policies and processes are effective, efficient and achieve their intended goals.

4.2.3 Provide training to staff on reportable incidents, as well as reporting system and processes.

4.2.4 Provide adequate orientation to all workforce members regarding their responsibilities under the current laws and regulations governing their practice.

4.2.5 Comply with DoH incident reporting requirements.

4.3 Responsibilities of Healthcare Professionals

All DoH Licensed Healthcare Professionals must:

4.3.1 Fulfill their moral duty to report, in good faith, actual or potential wrongdoing in the workplace, whether they involve ethical breaches, unprofessional conduct, or criminal behaviors.

4.3.2 Refrain from using reporting channels for malicious purposes or to make false allegations.

4.3.3 Utilize the internal reporting channels first.

4.3.4 Exercise their professional judgement to decide whether to report a concern through the standard channels or escalate it via the whistleblowing process, especially if they have legitimate concerns or have exhausted standard reporting options (see **Appendix (2)**)

4.3.5 Abide by all current laws and regulations governing their practice, including the Medical Liability Law and Code of Ethics and Professional Conduct for Health Professionals.

4.3.6 Report any crime they become aware of to the Public Prosecution or a Judicial Police Officer, especially if the Public Prosecution can initiate legal action without requiring a complaint or request. ⁽⁸⁾

4.3.7 Fulfill their reporting obligations to DoH and other relevant authorities, including but not limited to:

- I. [Federal Law on the Prevention of Communicable Disease No. \(14\) of 2014](#) and its [Executive Regulations](#) ⁽⁹⁾
- II. [Federal Law No. \(3\) of 2016 Concerning Child Rights Law "Wadeema"](#) ⁽¹⁰⁾
- III. [Federal Decree-Law No. \(13\) of 2024 on the Protection Against Domestic Violence](#) ⁽¹¹⁾
- IV. [Federal Decree by Law No. \(45\) of 2021 Concerning the Protection of Personal Data](#) ⁽¹²⁾
- V. [DoH Standard on Reporting Suspected Adverse Drug Reactions and Adverse Events Following Immunization](#) ⁽¹³⁾
- VI. [DoH Incident Reporting and Management Standard](#) ⁽⁴⁾
- VII. [Standard on Reporting Medication Errors & Suspected Quality Problems Related to Medicinal Products and Dietary Supplements](#) ⁽¹⁴⁾
- VIII. [Abu Dhabi Occupational Safety and Health System Framework \(ADOSH-SF\) Mechanisms](#) ⁽¹⁵⁾
- IX. [Standard for the Principles and Procedures Governing the Recovery of Payment for Healthcare Services under the Health Insurance Scheme](#) ⁽¹⁶⁾

5. Policy Scope of Implementation

5.1 This policy applies to:

5.1.1 All licensed healthcare providers

5.1.2 All healthcare workforce members

6. Exempted from Policy Scope

None

7. Enforcement and Compliance (Consequences/sanction of not applying policy by related stakeholder)

DoH may impose disciplinary actions and monetary sanctions for any breach of requirements under this policy in accordance with the Disciplinary Regulation of the Healthcare Sector in the Emirate of Abu Dhabi.

8. Monitoring and Evaluation (Key success factors)

DoH will monitor and evaluate the effectiveness, outcomes and impact of this Policy. Any necessary changes to the policy will be made accordingly.

9. Relevant Reference Documents

No.	Reference Date	Reference Name	Relation Explanation / Coding / Publication Links
1	Accessed November-2024	See Types of Crimes and corresponding penalties in Section Three: <i>Crimes</i> , Federal Law by Decree No. (31) of 2021 Promulgating the Crimes and Penalties Law	https://uaelegislation.gov.ae/en/legislations/1529
2	Accessed October-2024	Adapted from Abu Dhabi Police (2024) <i>Frequently Asked Questions</i>	https://srv.adpolice.gov.ae/en/aman/pages/qa.aspx
3	Accessed August-2024	Ministerial Resolution No. (1448) of 2017 (adoption of Code of Ethics).	Arabic version https://mohap.gov.ae/app_content/legislations/php-law-ar-64/mobile/index.html English version https://mohap.gov.ae/app_content/legislations/php-law-en-64/mobile/index.html
4	Accessed November-2024	DoH Incident Reporting and Management standard	https://www.doh.gov.ae/en/resources/standards
5	Accessed August-2024	DoH Healthcare Workforce Bioethics Guidelines	https://www.doh.gov.ae/en/resources/guidelines
6	Accessed November-2024	See General Duties as to Good Professional Conduct in <i>DoH HEALTHCARE PROFESSIONALS MANUAL (2017)</i>	https://www.doh.gov.ae/-/media/A47D9907918943438EDB512BE9347AB8.ashx
7	Accessed August-2024	ISO 37002: 2021 (E) Whistleblowing Management Systems — Guidelines; 1 st edition 2021-07	
8	Accessed November-2024.	Article 38 of Federal Decree by Law No. (38) of 2022, Promulgating the Criminal Procedures Law	https://uaelegislation.gov.ae/en/legislations/1609
9	Accessed November-2024	Federal Law on the Prevention of Communicable Disease No. (14) of 2014 and its Executive Regulations	https://uaelegislation.gov.ae/ar/legislations/1198

9.Relevant Reference Documents

No.	Reference Date	Reference Name	Relation Explanation / Coding / Publication Links
10	Accessed November-2024	Federal Law No. (3) of 2016 Concerning Child Rights Law "Wadeema"	https://uaelegislation.gov.ae/en/legislations/1176
11	Accessed November-2024	Federal Decree-Law No. (13) of 2024 on the Protection Against Domestic Violence	https://uaelegislation.gov.ae/en/legislations/2580
12	Accessed November-2024	Federal Decree by Law No. (45) of 2021 Concerning the Protection of Personal Data	https://www.uaelegislation.gov.ae/en/legislations/1972
13	Accessed November-2024	DoH Standard on Reporting Suspected Adverse Drug Reactions and Adverse Events Following Immunization	https://www.doh.gov.ae/en/resources/standards
14	Accessed December-2024	Standard on Reporting Medication Errors & Suspected Quality Problems Related to Medicinal Products and Dietary Supplements	https://www.doh.gov.ae/en/resources/standards
15	Accessed December-2024	Abu Dhabi Occupational Safety and Health System Framework (ADOSH-SF) Mechanisms	https://www.adphc.gov.ae/-/media/Project/ADPHC/ADPHC/PDF/OSHAD-SF/Mechanisms/11---Incident-Notification-Eng.pdf
16	Accessed December-2024	Standard for the Principles and Procedures Governing the Recovery of Payment for Healthcare Services under the Health Insurance Scheme	https://www.doh.gov.ae/en/resources/standards
17	Accessed August-2024	Article (14) of Federal Decree-Law No. (33) of 2021 Regarding the Regulation of Employment Relationship	https://uaelegislation.gov.ae/ar/legislations/1541
18	Accessed on 4-Nov-2024.	Abu Dhabi Media Office: "Wajib" reporting platform	https://www.mediaoffice.abudhabi/en/topic/wajib-reporting-platform/
19	Accessed 4-Nov-2024.	Abu Dhabi Police: About AMAN Service	https://srv.adpolice.gov.ae/en/aman/Pages/aboutus.aspx
20	Accessed 4-Nov-2024	Abu Dhabi Government: about TAMM	https://www.tamm.abudhabi/en/about-tamm
21	Accessed 12-Dec-2024.	Department of Health: Abu Dhabi Healthcare Information Security Programme- AAMEN	https://www.doh.gov.ae/en/programs-initiatives/Aamen

9.Relevant Reference Documents

No.	Reference Date	Reference Name	Relation Explanation / Coding / Publication Links
22	Accessed 12-Dec-2024.	The Department of Community Development: DCD Launches Groundbreaking Policy to Protect People of Determination	https://addcd.gov.ae/en/Media-Center/News/DCD-Launches-Groundbreaking-Policy-to-Protect-People-of-Determination
23	Accessed 25-Dec-2024	Department of Health: Circular No. (2023 / 121): Child Protection- Brochure- Guidance for Healthcare Providers	https://www.doh.gov.ae/-/media/C7B1C557C04949928BE12DB853DD683E.ashx
24	Accessed 25-Dec-2024	Department of Health: Circular No. (2023 / 220): Child Protection - Brochure - Guidance for Healthcare Providers	https://www.doh.gov.ae/-/media/1F4945731CAC4D21A108E07B5A019FE5.ashx
25	Accessed 25-Dec-2024	Department of Health: Circular No. (2024 / 244): Opening Child Protection Unit at Sheikh Shakhbout Medical City	https://www.doh.gov.ae/-/media/E83DE5D3C89E437B87AAE06650B322F7.ashx

Appendix (1): Examples of wrongdoing

The following list serves as guidance for institutional policy developers on potential wrongdoing that should be addressed in their policies. However, the development of the institutional policy list should be informed by the specific context of the healthcare providers and the identification and analysis of risks within their institutions.

- I.** Frauds
- II.** Violating patient rights (consent to treatment, safe and quality care)
- III.** Unlicensed practice
- IV.** Providing healthcare by a professional who is impaired in the ability to provide competent and safe care
- V.** Sexual harassment ⁽¹⁷⁾
- VI.** Discrimination ⁽¹⁷⁾
- VII.** Bullying or any verbal, physical or psychological violence ⁽¹⁷⁾
- VIII.** Prejudice Behavior
- IX.** Violations of institutional code of conduct
- X.** Deliberate noncompliance with healthcare regulations
- XI.** Gross negligence or apparent lack of foresight in following standard medical procedures
- XII.** Unjustified deviation from medical standards and rules of professional practice
- XIII.** Adopting medically unrecognized methods
- XIV.** Gross medical errors
- XV.** Diversion of drugs
- XVI.** Practices that jeopardize patient safety
- XVII.** Practices that endanger the environment

Appendix (2): Reporting channels

The following table provides a list of several reporting channels maintained and managed by governmental authorities.

Sn	Name	Address	Focus	Responsible Authority
1	WAJIB	https://wajib.gov.ae/	<p>Violations related to public funds reports</p> <p>Launched by the Abu Dhabi Accountability Authority (ADAA), the Wajib platform enables community members to submit confidential reports of financial and administrative violations in entities that fall under ADAA jurisdiction.⁽¹⁸⁾</p>	Abu Dhabi Accountability Authority (ADAA)
2	AMAN Service	https://srv.adpolice.gov.ae/en/aman/pages/default.aspx	<p>Crimes, community safety, traffic incidents</p> <p>A professional secure channel operating 24/7 offering the public the freedom to report in confidence, information relating to crime, community safety, traffic incidents or any other matters that contributes to crime prevention. Aman Service guarantees confidentiality allowing the public to pass information about crime anonymously.⁽¹⁹⁾</p>	Abu Dhabi Police
3	TAMM	<p>Website: https://www.tamm.abudhabi/en/contact</p> <p>Phone: 800555 (24 x 7)</p>	<p>Complaints</p> <p>TAMM is a state-of-the-art unified digital ecosystem of over 700 government and private sector services that is customer-centric at its core.⁽²⁰⁾ Through the Tamm platform, individuals can report an incident or file a complaint. Healthcare professionals may use this channel to escalate to DoH any wrongdoing incidents that were not appropriately addressed by their institutional reporting channels.</p>	Abu Dhabi Government
4	DoH	https://www.doh.gov.ae/en/contact-us	<p>Health insurance or medical errors</p> <p>Through DoH online portal individuals can submit a complaint about health insurance or medical errors.</p>	Department of Health
5	AAMEN	<p>Email: ADHCCERT@doh.gov.ae</p> <p>Phone: +971 2 419 3777(24 x 7)</p>	<p>Information Security Incidents</p> <p>As part of AAMEN programme initiatives Department of Health seeks to strengthen the emirate's healthcare sector cybersecurity, by establishing Abu Dhabi Healthcare CERT. The main goal of the Healthcare CERT, from a cybersecurity perspective, is to protect information, and the ability of critical infrastructures to continue to function. It typically monitors incidents at a sector level, identifies incidents that could affect critical infrastructures, warns critical stakeholders about computer security threats, and helps to build organizational CERTs in the public and private sectors.⁽²¹⁾</p>	Department of Health

Sn	Name	Address	Focus	Responsible Authority
6	Call Center	Phone: 800-444	<p>People of determination abuse reports</p> <p>The Department of Community Development implements a Policy to Protect People of Determination which aims to protect people of determination from all forms of maltreatment which includes all types of abuse, neglect, exploitation, and discrimination based on disability ⁽²²⁾</p>	The Department of Community Development
7	Child Protection Units	<ul style="list-style-type: none"> ➤ SKMC (AD) - 02 819000 ⁽²³⁾ ➤ Tawam (AA) – 0564122513 ⁽²⁴⁾ ➤ SSMC(AD) – 8007762 ⁽²⁵⁾ 	Child abuse reports	Government entities