

First report  
23 June 2026



# Whistle Monitor

**Participatory monitoring of the accessibility, usability, and information completeness of internal whistleblowing channels in Italy**

Focus on healthcare, universities, and local authorities



in collaboration with



## Executive summary

With Whistle Monitor, Libera assessed the extent to which conditions of **transparency, usability and accessibility of internal whistleblowing channels** were effectively guaranteed, as of 22 May 2026, by 434 Italian public and private organisations entrusted with safeguarding some of the fundamental pillars of substantive democracy:

the **right to health**, upheld by a broad network of 190 local health authorities, hospitals and research institutes;

the **right to education**, represented by all 99 institutions in the higher education sector, including public universities, schools of advanced studies, and private and online universities;

and the **right to good administration**, represented by 145 selected local and territorial authorities, including Regions, Metropolitan Cities, Autonomous Provinces and provincial capital municipalities.

For each institution, we monitored the extent to which **complete information** is provided on how whistleblowing mechanisms function, i.e. procedures, timelines and protections; the degree of **accessibility** of reporting channels, including for persons with disabilities; and the overall **usability and transparency** of the reporting process. The resulting score was developed in consultation with, and validated by, the Italian National Anti-Corruption Authority (ANAC), and reflects the requirements set out in ANAC's Guidelines on Whistleblowing (Resolution No. 478 of 26 November 2025), which provide operational guidance on the design, management and handling of internal reporting channels.

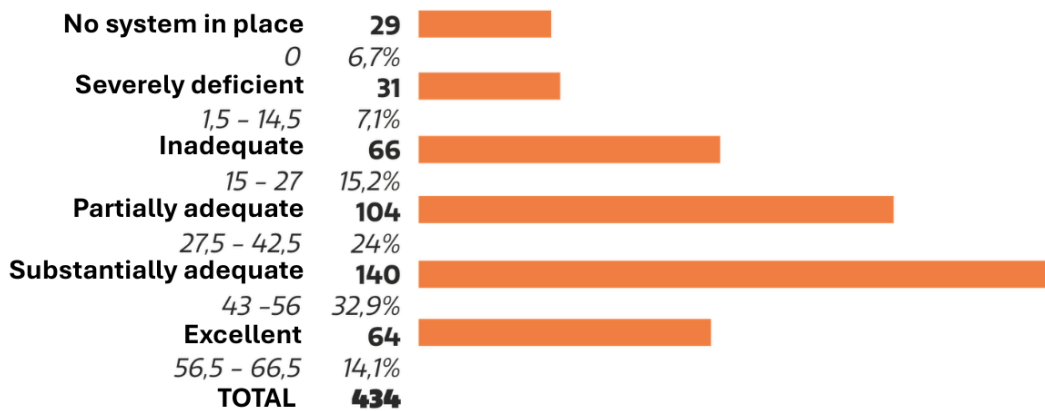
The monitoring was carried out by 44 volunteers from Libera, the Italian Secretariat of Medical Students (SISM), and LINK - University Coordination, a national university student organisation.

## Overall score results

The most striking finding to emerge from this monitoring exercise is that **no institution can currently claim to be fully accessible and usable in terms of whistleblowing information**: not one organisation achieved full compliance, reaching 100% of the score. **More than half of the institutions monitored (56.9%) fall within the "intermediate" range**, showing either partial or substantial adequacy.

Institutions achieving excellent performance account for only **14.1%** of the total, nearly half the proportion falling within critical categories (**28.9%**). In practical terms, **one institution out of three still fails to provide the minimum information a whistleblower would need to be guided through the reporting process**.

Within this picture, a further **6.7% of all institutions stand out for providing neither an internal reporting channel nor a dedicated information page**. While this may appear a small share, it corresponds to 29 institutions that, despite a legal obligation to do so, effectively nullify the right to report wrongdoing.



At territorial level, **Emilia-Romagna** emerges as the country's strongest-performing region, with an average score of 50.6 out of a maximum of 70.5, no institutions in critical categories, and 70% of entities placed in the top performance bands. By contrast, **Sicily, Abruzzo and Calabria** show the most significant weaknesses, with critical scores recorded by 58.8% of monitored institutions in Sicily, 53.8% in Abruzzo and 45% in Calabria.

From a sectoral perspective, **public healthcare emerges as the most virtuous field**. Healthcare organisations show the highest concentration of entities within the adequacy categories and the highest median score in the sample (44.2).

**Local and territorial authorities, by contrast, display the strongest internal polarisation. Supramunicipal entities**, including Regions, Metropolitan Cities and Autonomous Provinces, **generally provide clearer information and more usable systems**, with 61.1% of institutions in the top performance categories and only 5.6% showing significant shortcomings. **Provincial capital municipalities lag considerably behind**. Almost a quarter of them (24.8%) fall within critical categories, four times the share recorded among supramunicipal authorities, and 9.2% provide virtually no information at all on whistleblowing procedures.

**Higher education sector shows comparable polarisation**. Public universities form a relatively homogeneous group concentrated around mid-range levels of adequacy, with only 8.3% achieving excellent scores. **Private universities represent the most problematic segment of the entire monitoring exercise**: 22.2% have no internal whistleblowing system at all (almost six times the overall average) and only around a quarter (25.90%) reach a satisfactory level of compliance.

### Individual indicators: the most critical and most positive findings

Anyone navigating an institutional website with the urgent need to submit a report should be able to find a single, clear and easily identifiable information space. Yet **more than one institution out of ten (12%) has no dedicated whistleblowing webpage at all**. In these cases, essential information is either entirely absent or scattered across internal regulations, anti-corruption plans or generic sections of the website - placing the burden of assembling a coherent picture on the very person who is already hesitating about whether to come forward.

A person facing the ethical dilemma of reporting wrongdoing also needs to understand, immediately, **what can and cannot be reported**, so as to overcome the fear of making a mistake or

facing retaliation for something that turns out not to qualify. Yet **only 3.1% of institutions provide examples tailored to their own organisational context**. In the overwhelming majority of cases, institutions limit themselves to generic categories of wrongdoing (80.9%) or provide abstract, decontextualised examples (16%) that offer little practical guidance.

Knowing **who will receive and handle a report** is another essential psychological and procedural precondition for trust, yet only around **two institutions out of ten provide this information clearly**. The name of the person responsible for handling reports is explicitly stated in just **21.7%** of cases; most institutions offer only a generic role description (69.3%). Transparency drops further when it comes to the people who may assist or substitute the case handler and gain access to the report itself: **77.5%** of institutions provide no information whatsoever on this point.

These gaps compound one another. **Nearly a third of institutions (32.7%) still fail to provide a whistleblowing-specific privacy notice, or provide no privacy information at all**. Moreover, **only 41.9% clearly communicate procedural timelines**, including legally required acknowledgement of receipt within seven days, leaving a person who has just submitted a sensitive report with no sense of what to expect, or when.

Whistleblowing should be accessible to everyone, yet **technical accessibility features for persons with visual, motor or cognitive disabilities or difficulties are present on only 12.6%** of the webpages analysed.

Awareness of **alternatives to the internal channel** is similarly limited: the possibility of reporting directly to ANAC or making a public disclosure is clearly explained **in only 51.8% of cases**.

The ability to **choose how to submit a report** matters too: the coexistence of written and oral channels allows each person to use the method they feel most comfortable with. Yet **37% of institutions still offer only written reporting options**, failing to provide oral reporting channels.

On written reporting, **encrypted digital platforms have become the dominant standard, adopted by 95% of institutions**, a genuinely positive development. However, several organisations continue to offer alternative channels that pose significant risks to confidentiality, including ordinary or certified email (18.3%), sealed single envelopes (12.1%) and hand delivery (4%). Particularly **concerning are the 8.8% of cases in which access to the reporting platform is restricted through institutional intranets or employer-controlled digital identity systems**. Such requirements effectively exclude categories of people who are legally entitled to report, including former employees and external collaborators.

On what happens after a report is submitted, **around one institution out of five (20.7%) remains completely silent about the investigative phase**. Although this may look like a contained figure, it is highly concerning from the perspective of a reporting person who awaits feedback and often experiences significant anxiety during periods of uncertainty.

Knowing what protections exist is fundamental, but knowing what to do when those protections fail matters just as much. **While 69.4% of institutions describe the legal safeguards available to whistleblowers, only 45% explain concretely how to report retaliation to ANAC**, and just 19.6% provide a direct link to do so. Meanwhile, **23% of institutions provide no information whatsoever on available forms of protection**.

Finally, **in 81.7% of cases the dedicated whistleblowing webpage includes no whistleblowing-specific impact report** from the Anti-Corruption and Transparency Officer (RPCT), the public official responsible for overseeing anti-corruption and transparency measures within



Italian institutions, including the management and oversight of whistleblowing procedures. **Open data** on the functioning of internal whistleblowing systems is **available in only 26% of cases**.

A more encouraging finding concerns practices that go beyond legal requirements: **40% of institutions explicitly mention the possibility of obtaining support from civil society organisations included in ANAC's official list of support entities**, and 16.5% provide direct links to those services. This represents an important step towards the model of "community whistleblowing" that we seek to promote.

The full report (available in Italian only) includes detailed commentary on these findings from ANAC, SISM, LINK and Libera, drawing on a broader set of data than the ones summarised here.

The overall conclusion is clear: **there is still a long way to go**. We know that access to clear, reliable and comprehensive information is decisive for anyone considering whether to report wrongdoing. Every obstacle, however small, and every gap in information encountered along the way acts as a disincentive, and the cumulative effect of many small gaps is what ultimately determines whether a person comes forward or stays silent. For this reason, and in line with the principles enshrined in Article 3 of the Italian Constitution, **every effort should be made to remove barriers that limit the effective exercise of the right to report**.

The purpose of this monitoring exercise is not to pass judgment on individual institutions. The results presented here should be read as trends and indicators rather than definitive assessments. Our aim is to offer a starting point for improvement, and to contribute to the cultural and organisational change needed to make whistleblowing systems more accessible, more transparent and more effective for everyone who might one day need to use them.

## Acknowledgements

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The report is produced by [Libera. Associazioni, nomi e numeri contro le mafie APS](#). It was conceived and written by Leonardo Ferrante, Elisa Orlando and Camilla Galaverni.

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A full version of the report is available in Italian only [on Libera's website](#).

We welcome the chance to exchange with other organisations wishing to promote similar initiatives in their own countries. If you are interested, please contact us at [common@libera.it](mailto:common@libera.it).

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This report was produced as part of the [Sixth National Action Plan for Open Government](#) (NAP 2024-2026).