PRO TIP SERIES

How to design a trusted, impartial and secure whistleblowing program.

OBJECTIVE

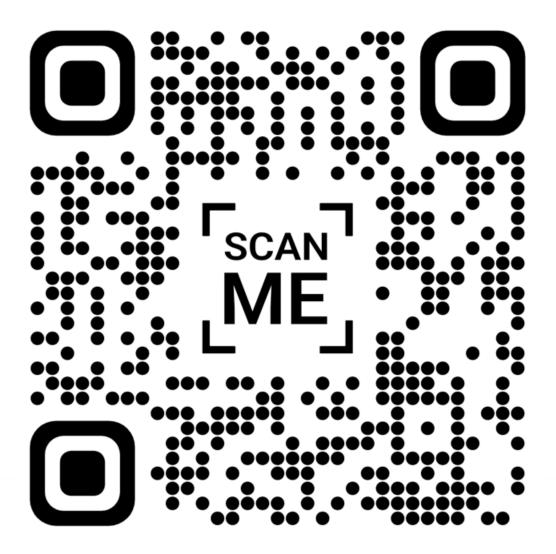
Foster a "speak out" culture to guard rail your organization's success.

ABOUT THE SERIES

16 pro tips including a gap analysis and action plans.



Whistleblowing Management





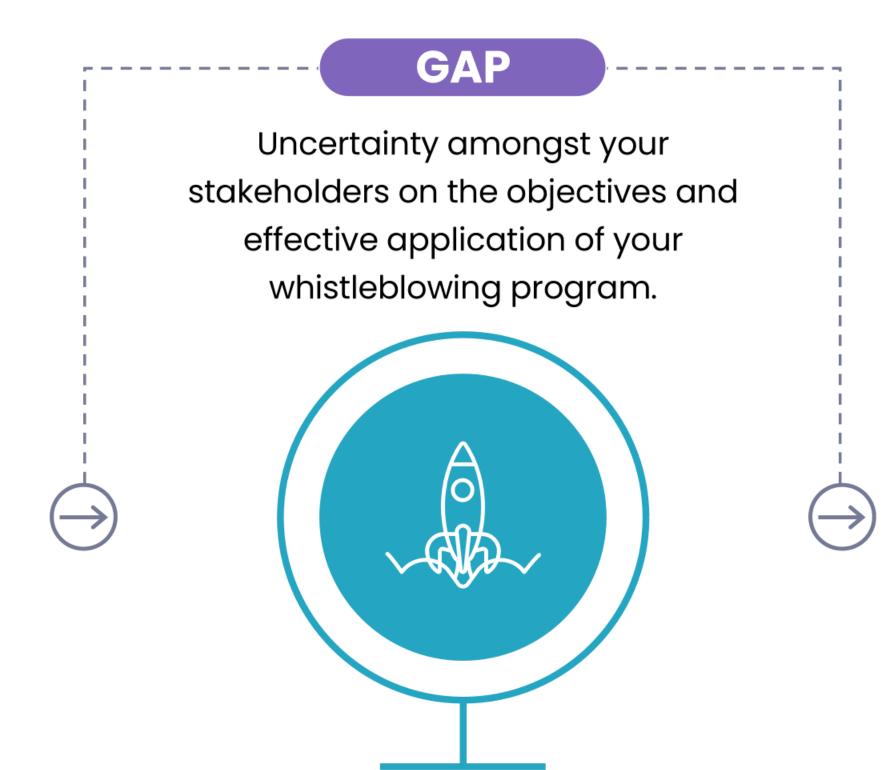
Pro tip #1 – Review and update your whistleblowing policies and procedures





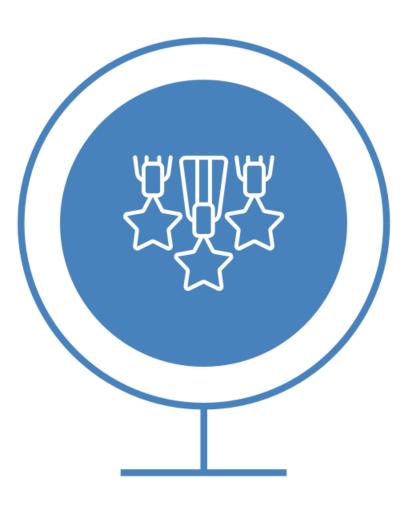
CURRENT STATE

Your current policies and procedures are generic, high level and lack context.



ACTION PLAN

Include escalation matrix, stakeholder coverage, geographical reach, reporting channels, anonymity and confidentiality.



DESIRED STATE

Sufficient guidance to your stakeholders to ensure that your whistleblowing program objectives are met.



Pro tip #2 – Assign appropriate authority and responsibility for your whistleblowing program





KEY STEPS TO BRIDGE GAP



CURRENT STATE

No formal authority and responsibility has been assigned.

No leadership commitment at senior management and Board level.

ACTION PLAN

Designate an officer and/or committee to oversee the program.

Periodically review the performance of the assignee.

ACTION PLAN

Periodically report on the performance of the whistleblowing program.

Assign the requisite resources to support the program's plans.

DESIRED STATE

The whistleblowing program is proactively championed and operates effectively.

The right tone at the top is set and cascaded through out the organization.



SCAN ME

Pro tip #3 – The role of leadership (Board and Senior Management)

ACTION PLAN

- 1. Accountability for quality of responses to issues.
 - 2. Enact and enforce whistleblowing policies.
- 3. Sustain awareness and strengthen willingness to report.

CURRENT STATE

Lack of leadership commitment, and organization-wide mistrust on the whistleblowing program.



DESIRED STATE

Set and cascade the appropriate tone for the whistleblowing program.



ACTION PLAN

- 4. Performance rating integration.
- 5. Appropriate consequences as a deterrent.
- 6. Update internal training, auditing and policies.



Pro tip #4 – Execute ongoing training and education







CURRENT STATE

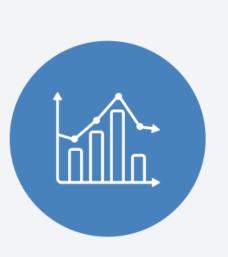
Stakeholders are not familiar with the whistleblowing program.





FUTURE STATE

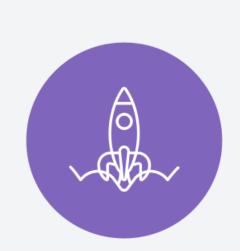
Stakeholders actively and appropriately engage with the whistleblowing program.





GAP

Awareness on the existence and effective use of the whistleblowing program is not sustained.





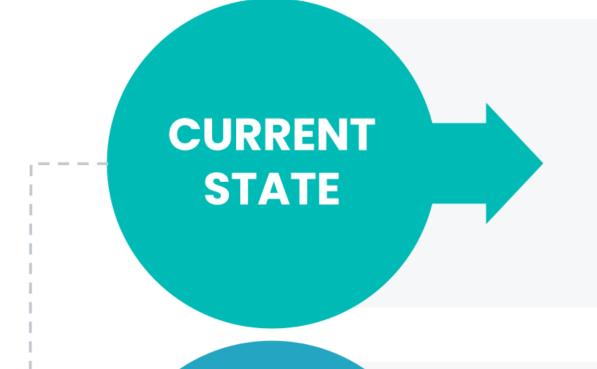
ACTION PLAN

Develop and execute a thematic awareness training program at planned intervals.



GAP

Pro tip #5 – Receiving and acting on whistleblower reports



Initial assessment

Uncertainty on how best to assess and address incoming whistleblower reports.

Case conclusion

Cases are not appropriately concluded and no meaningful action is taken.



Define procedure

Clearly define a risk-based triage process to assess received whistleblower cases.

Investigation policy

Design an investigation strategy to effectively address case complexities.



Case triage

Reports follow a pre-existing triage process to determine the next best course of action.

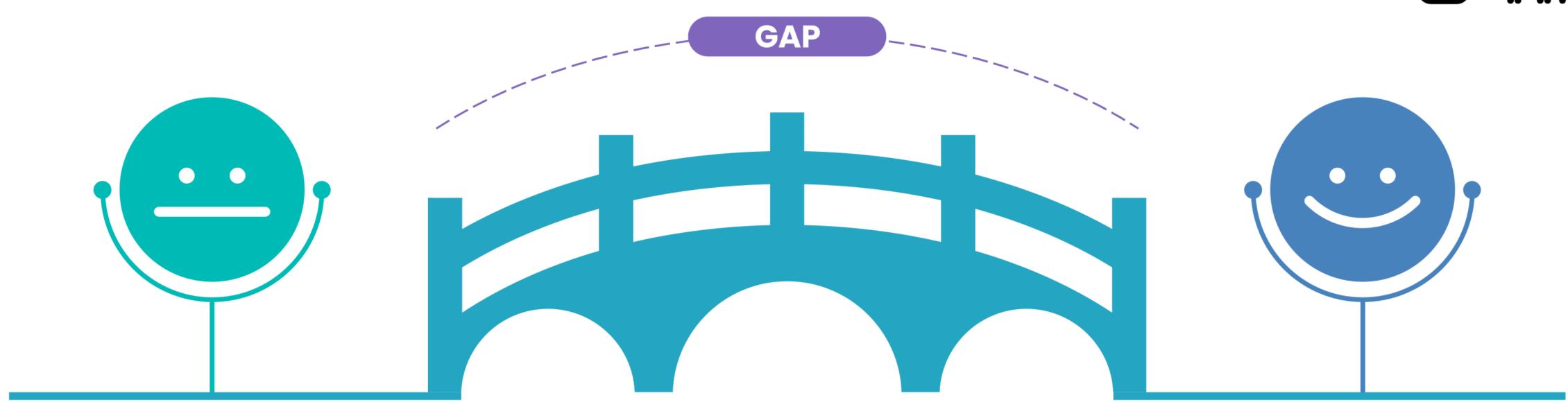
Control environment

An investigations policy is in place that supports meaningful risk and control action plans.



SCAN ME

Pro tip #6 – Protecting report subjects and relevant interested parties



CURRENT STATE

Report subjects, witnesses, victims, investigators, family members etc., are not protected from detriment.

KEY STEPS TO BRIDGE GAP

Preserving confidentiality in investigations by sharing information on a strict need-to-know basis.

Following due process including timely and impartial investigations and assistance.

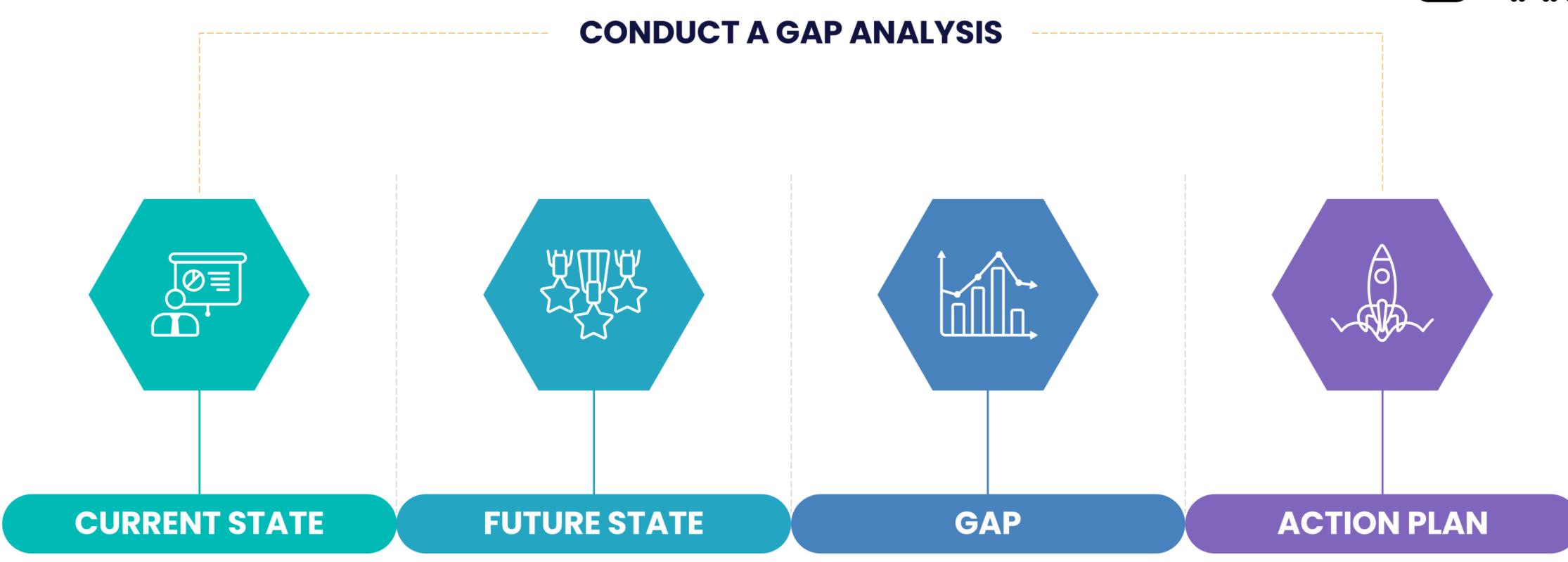
DESIRED STATE

Report subjects and relevant interested parties are protected from reputational or other harm enhancing the program's trust among stakeholders.



SCAN ME

Pro tip #7 – Receiving whistleblower reports



Visible, accessible and secure reporting channels have not been implemented and communicated.

Acceptance, support and satisfactory uptake of the whistleblowing program by stakeholders.

Inappropriate reporting channels misaligned with whistleblowers' expectations.

Avail multiple (anonymous) reporting avenues, including channels outside the chain of command.



Pro tip #8 – Addressing whistleblower reports

KEY STEPS TO BRIDGE GAP

ACTION PLAN

Investigations should be adequately resourced.

Clear terms and scope should be defined.

Investigations should withstand administrative, operational and legal review.

ACTION PLAN

Investigations should secure and protect evidence and personal data.

Investigations should be able to scale and adapt to changing circumstances.

Communication should be regular, including at material progress steps.

DESIRED STATE

The perception and reality of impartiality is enhanced, maintaining the program's trust by stakeholders.

CURRENT STATE

No formal process exists to ensure the impartiality and suitability of investigations.

Pro tip #9 – Concluding whistleblowing cases



KEY STEPS TO BRIDGE GAP

Communicate findings to the whistleblower (where possible) and seek their feedback.

DESIRED STATE

Risk and control lessons learnt, and ongoing protection measures are identified and implemented.

CURRENT STATE

Cases are not closed (within reasonable time) and/or no meaningful actions are implemented.





KEY STEPS TO BRIDGE GAP

Concisely define the criteria for concluding/closing cases.

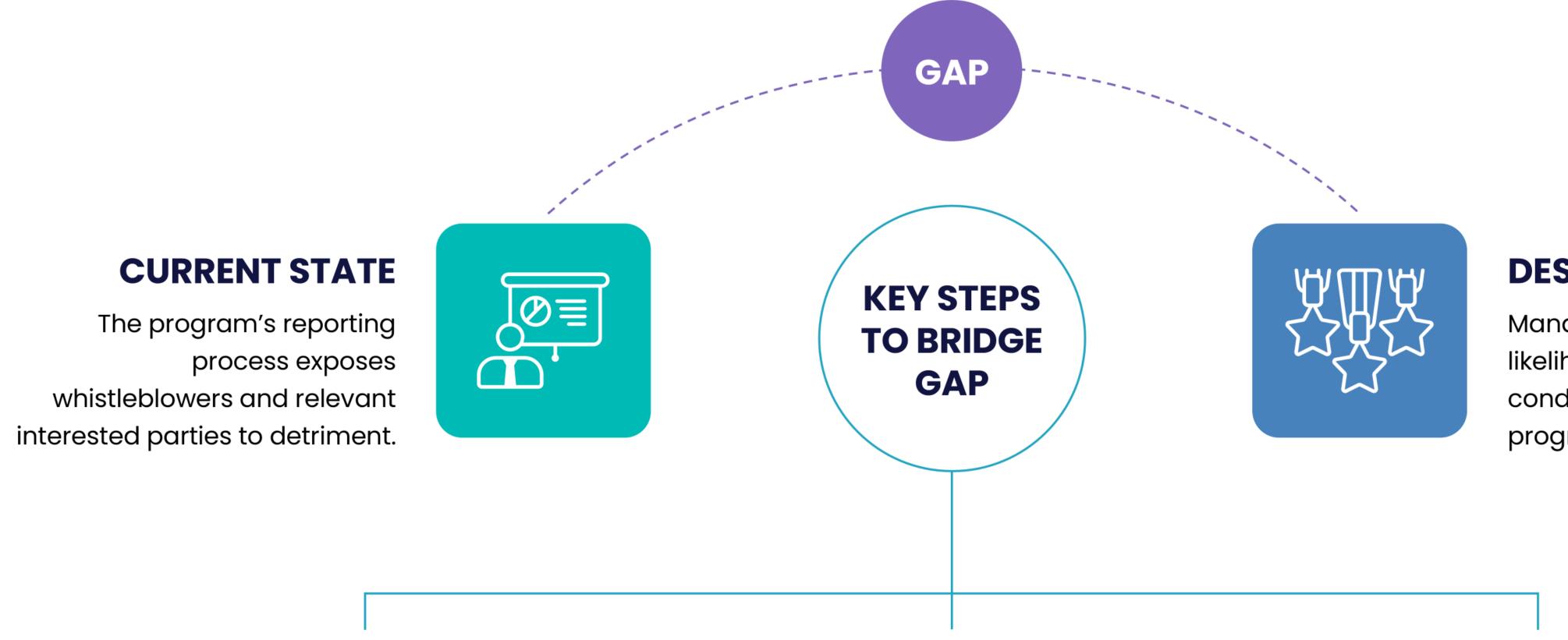






SCAN ME

Pro tip #10 – Assessing and preventing risks of detrimental conduct



DESIRED STATE

Manage the impact and likelihood of detrimental conduct to maintain the program's trust.

Perform an elaborate risk assessment on detrimental conduct every time a case is reported.

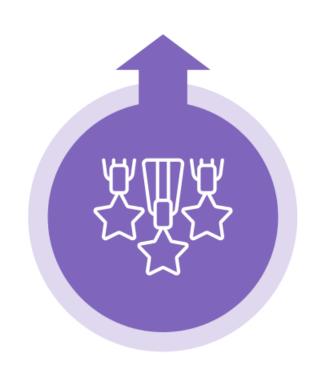
Implement actions dependent on the case type, timing and consequences to prevent detrimental conduct.

Continuously monitor the risks as appropriate such as when investigations are ongoing or outcome is known.



SCAN ME

Pro tip #11 – Addressing detrimental conduct



DESIRED STATE

A whistleblower is restored to their previous situation before suffering detriment, enhancing trust in the program.

KEY STEPS TO BRIDGE GAP

Impartial disciplinary action against those responsible for executing the detrimental conduct.



KEY STEPS TO BRIDGE GAP

Ensuring fair access to promotions, withdrawing related litigation, apologies, compensation, reinstatement, etc.

CURRENT STATE

Whistleblowers suffer detriment and no action is taken, thereby eroding trust in the whistleblowing program.





SCAN ME

Pro tip #12 – Monitoring and auditing



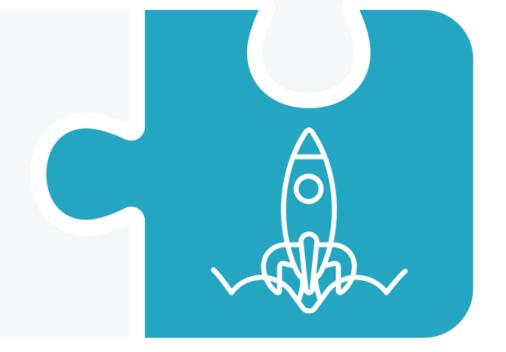
CURRENT STATE

The performance and effectiveness of the whistleblowing program is not monitored and evaluated.



ACTION PLAN

Monitor and evaluate the number and nature of cases reported, whistleblower feedback received, the program's awareness and trust, quality of investigations, corrective actions effectiveness etc.







DESIRED STATE

The program's objective of encouraging and facilitating reporting, supporting and protecting parties involved, and improving culture and governance are achieved.





Pro tip #13 – Operational planning and control of a whistleblowing program

CURRENT STATE

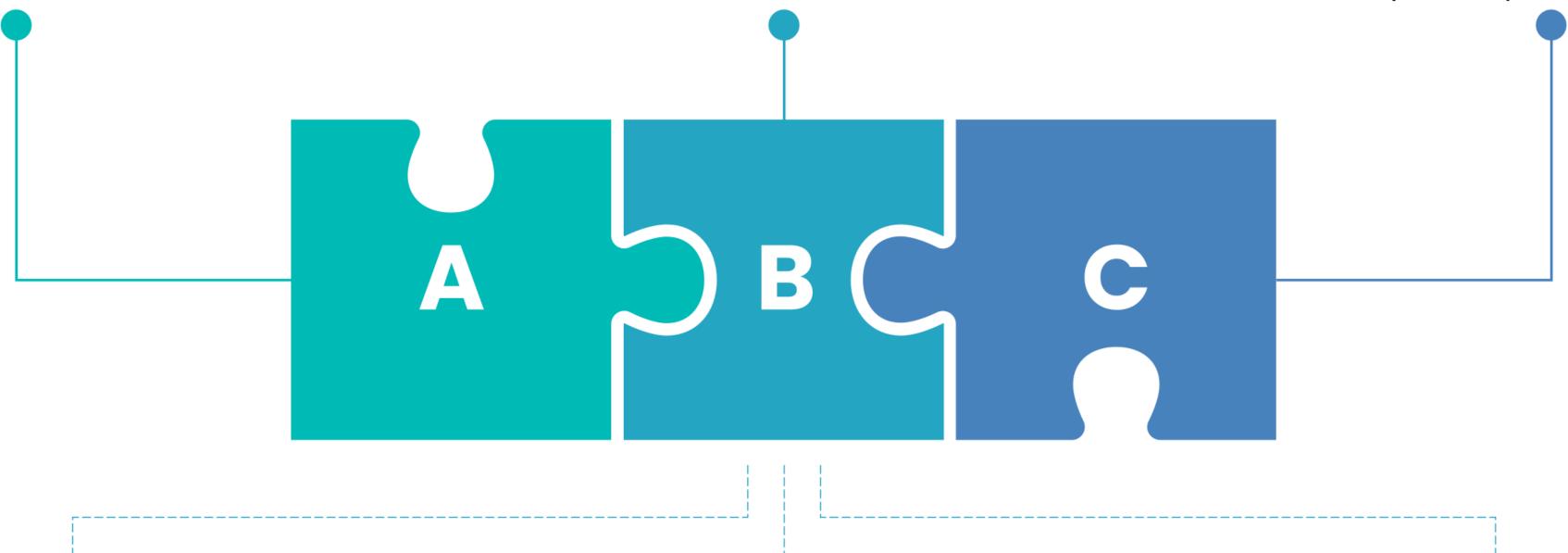
Comprehensive processes for receiving, assessing, addressing and concluding whistleblower cases have not been implemented.

ACTION PLAN

Provide feedback at each step of the whistleblowing process while managing expectations in an empathetic tone.

DESIRED STATE

The program's objectives are achieved while maintaining trust, impartiality and protection.



Acknowledgement of receipt should be timely.

Ensure that each step in the whistleblowing process is started and completed without undue delay.

Control planned changes and review the consequences of unintended changes.



Pro tip #14 – Protecting and supporting the whistleblower

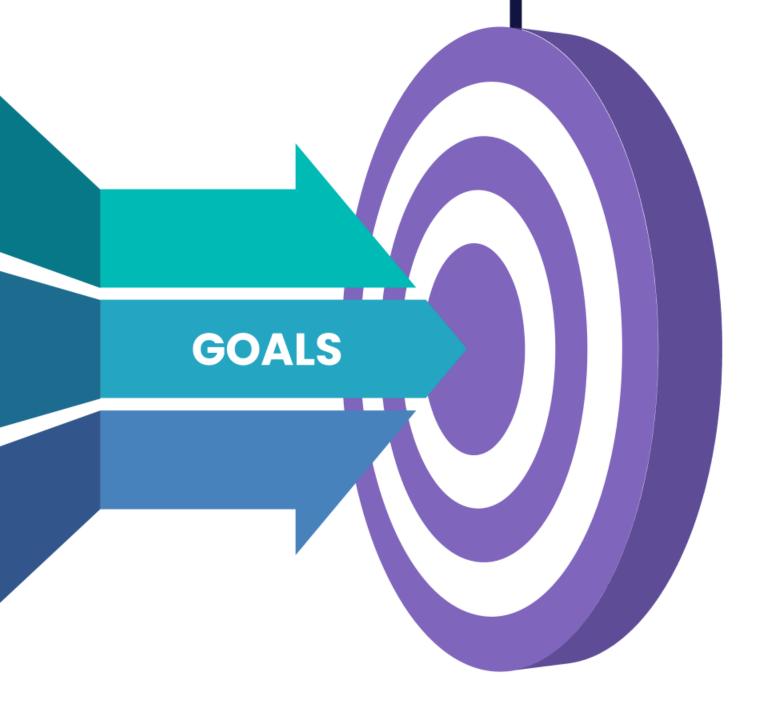


A CURRENT STATE No plans exist to provide a whistleblower with protection from detriment and reassurances on their wellbeing.

B ACTION PLAN

Top management to be accountable for ensuring support and protection.

C DESIRED STATE Whistleblowers are safe and trust the program's protection and support measures encouraging others to speak out.



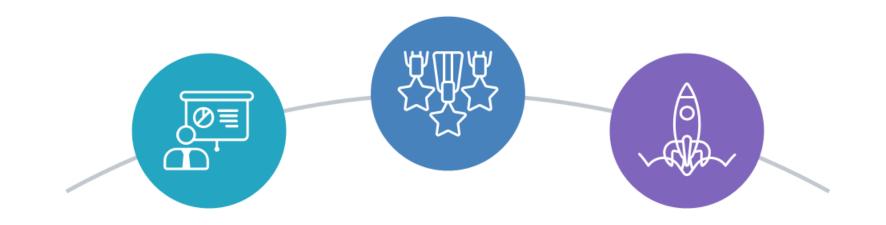




Pro tip #15 – Implementing a retaliation response system

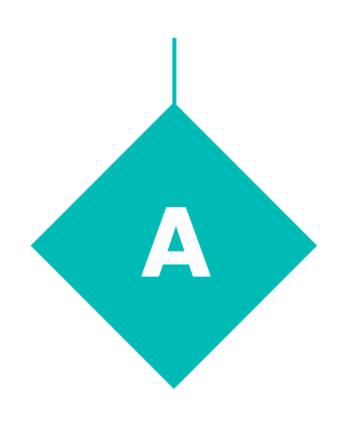
CURRENT STATE

Anti-retaliation measures do not exist or are deficient.

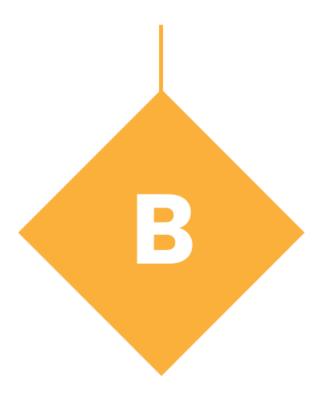


DESIRED STATE

Managed victimization risk enhances the program's trust.



KEY STEPS TO BRIDGE GAP





 Retaliation reporting channels are known and accessible.



3. Root cause analysis for retaliation cases is performed.



5. Ongoing contact with reporter is maintained.

6. Proposed discipline is independently reviewed.

2. Investigations are unbiased.

4. Strict case confidentiality.



SCAN ME

Pro tip #16 – Fostering a "Speak Up" culture

CURRENT STATE

Stakeholders are skeptical about the whistleblowing program's safety and efficacy.

ACTION PLAN

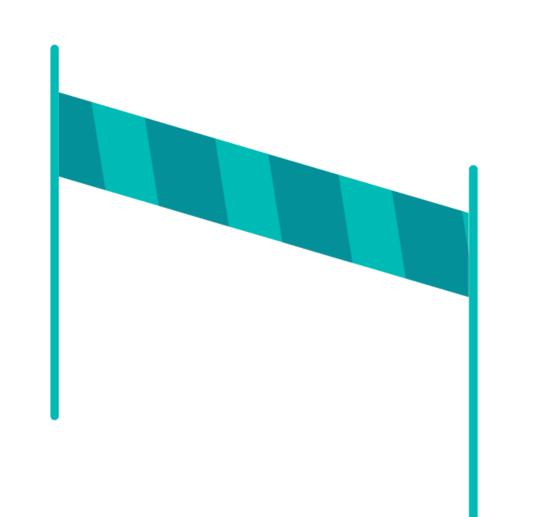
- 1. Encourage first line reporting.
- 2. Avail multiple reporting avenues.
- 3. Seek input from stakeholders.

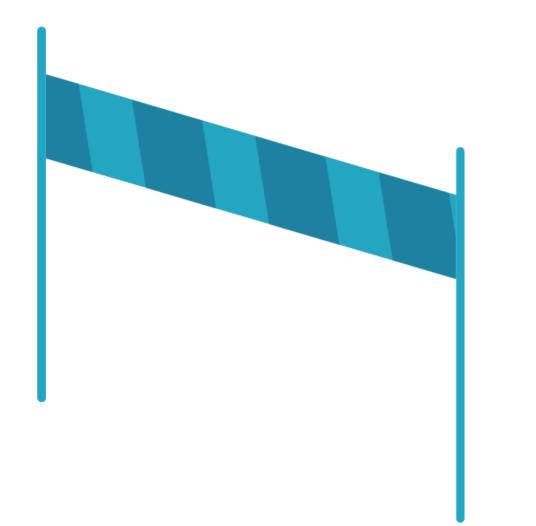
ACTION PLAN

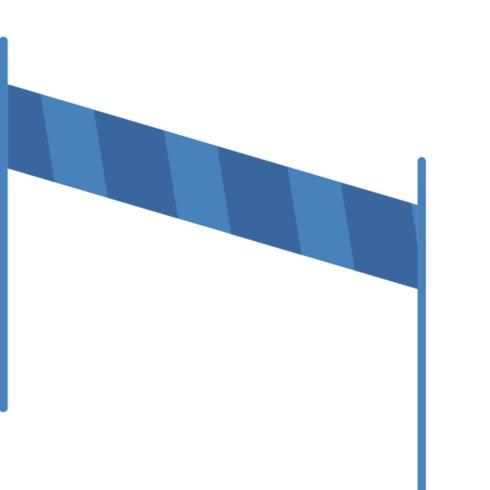
- 4. Ensure objective triage.
- 5. Surveil retaliation
- 6. Provide honest, timely feedback to whistleblowers.

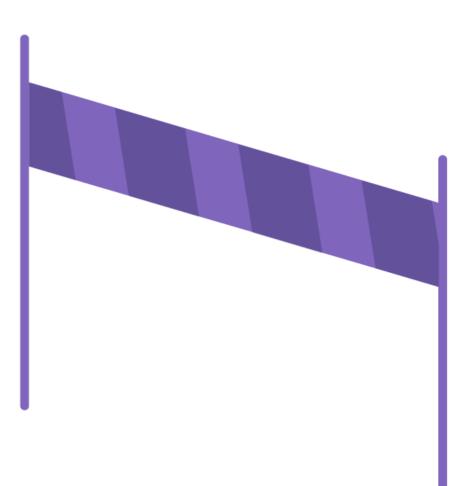
DESIRED STATE

Acceptance, support and satisfactory uptake of the whistleblowing program by stakeholders.









SPEAK OUT

Whistleblowing Management

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