

CORPORATE WHISTLEBLOWING

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.

SPEAK OUT

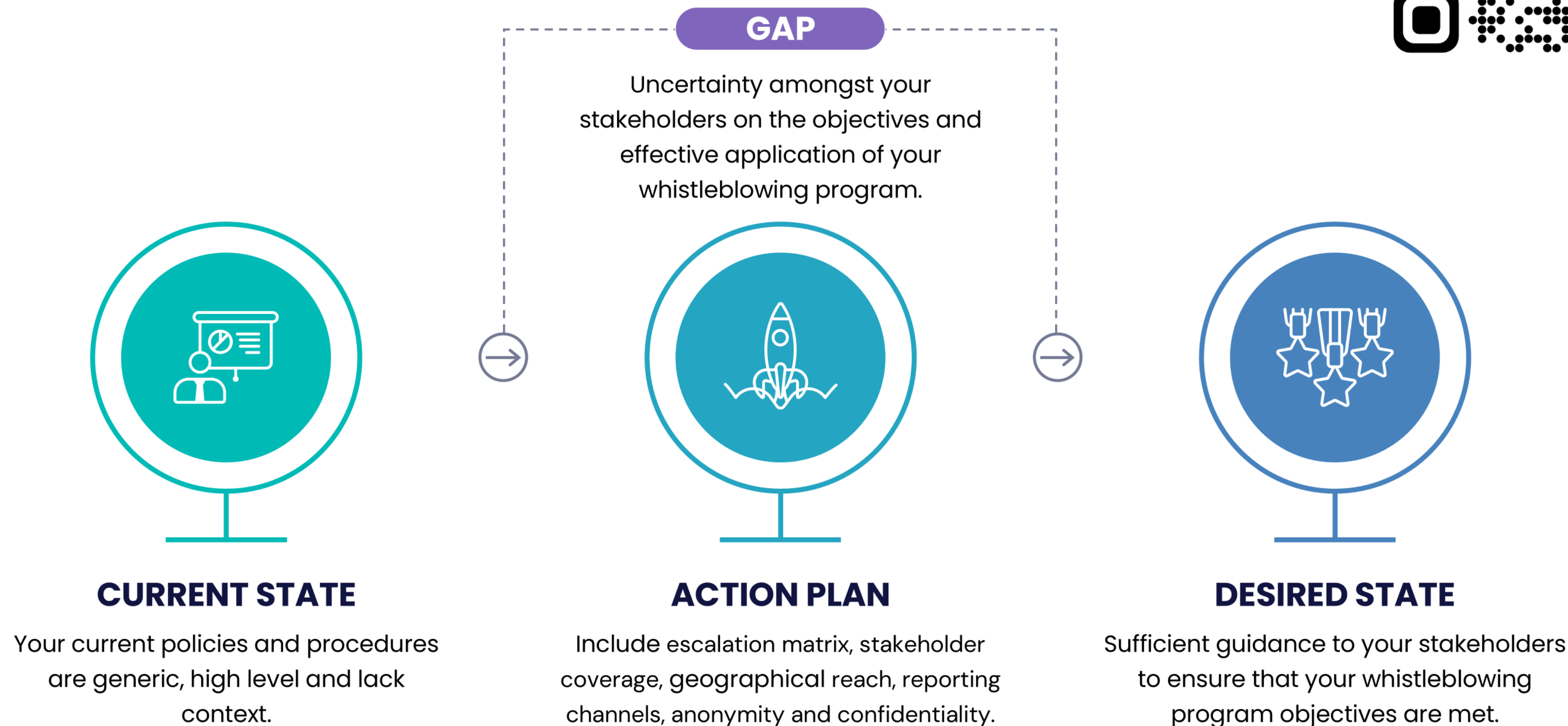
— Whistleblowing Management —



CORPORATE WHISTLEBLOWING



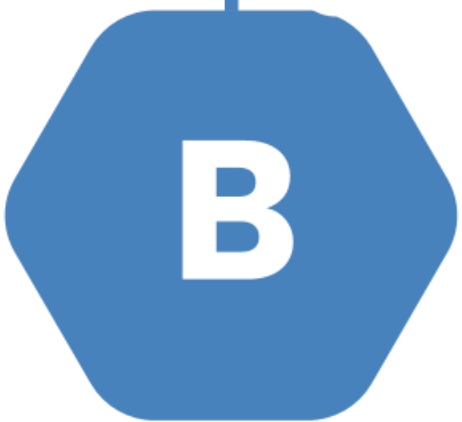
Pro tip #1 – Review and update your whistleblowing policies and procedures



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



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.



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

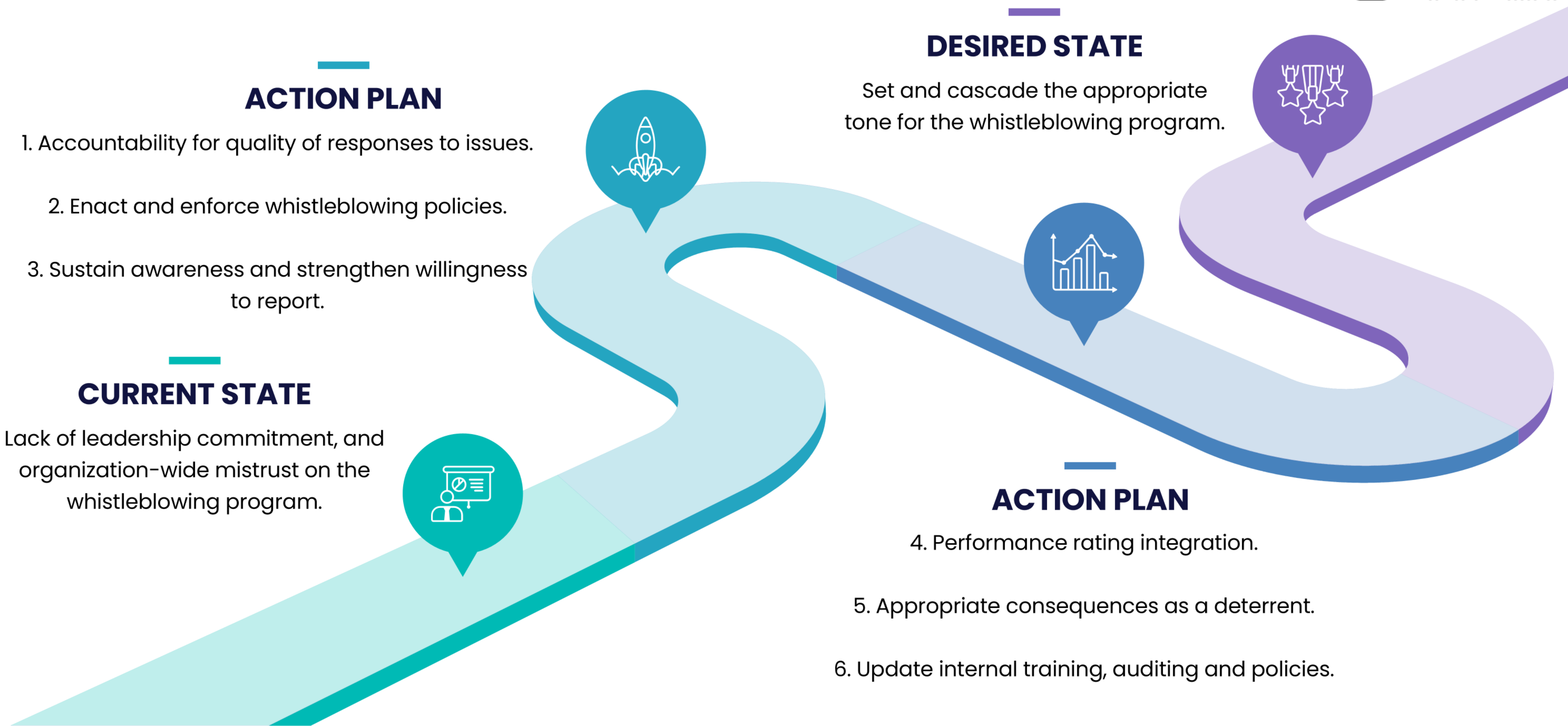
Lack of leadership commitment, and organization-wide mistrust on the whistleblowing program.

DESIRED STATE

Set and cascade the appropriate tone for the whistleblowing program.

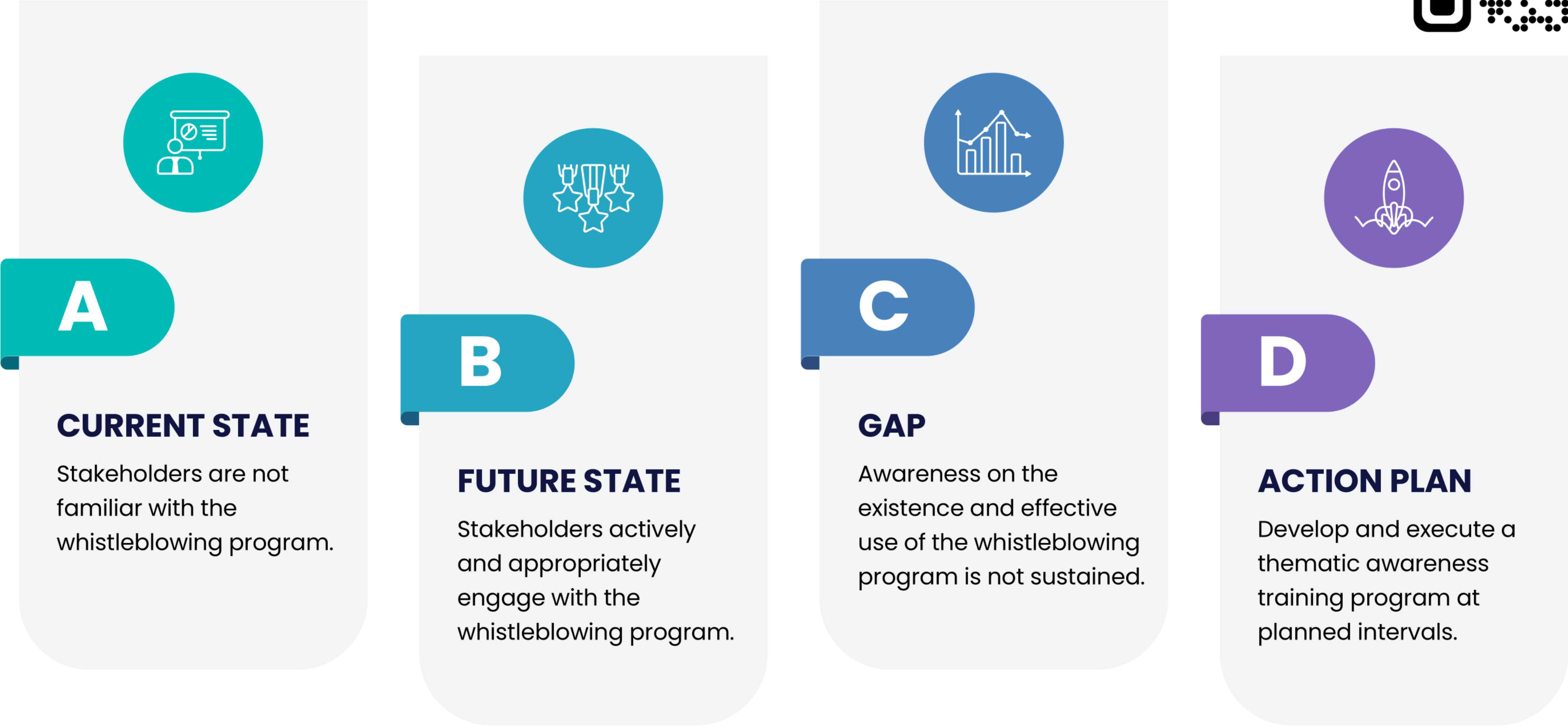
ACTION PLAN

- 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



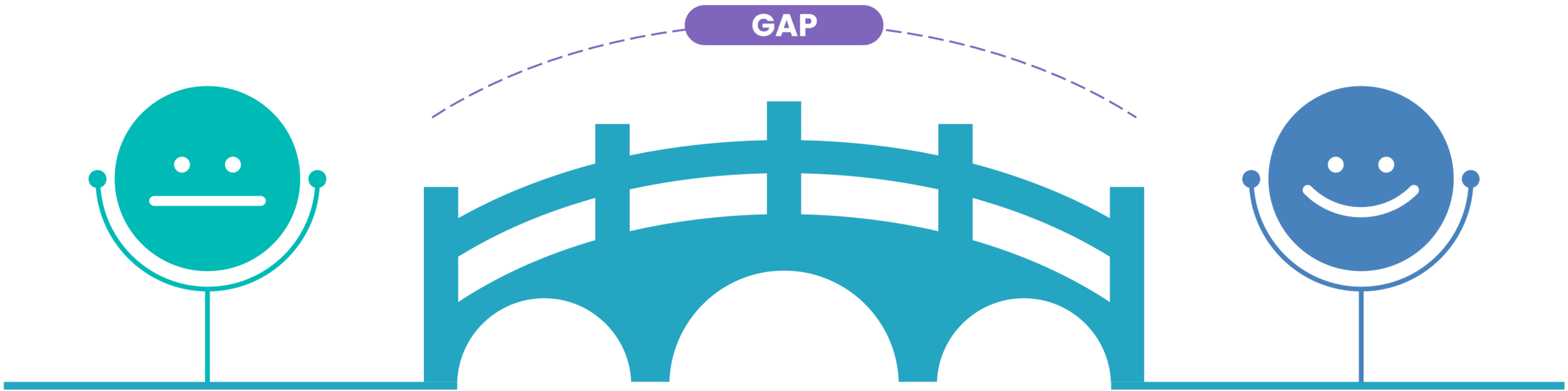


Pro tip #5 – Receiving and acting on whistleblower reports





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.

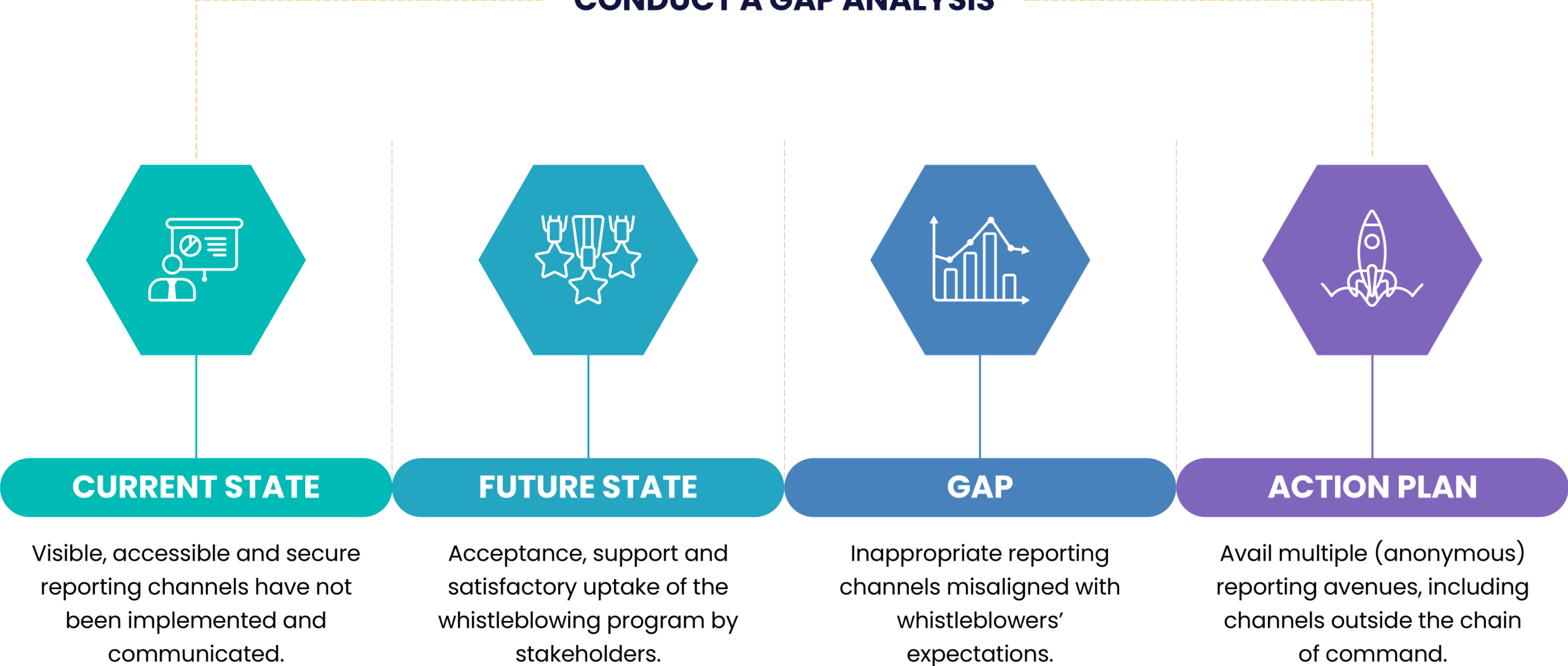
DESIRED STATE

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



Pro tip #7 – Receiving whistleblower reports

CONDUCT A GAP ANALYSIS





Pro tip #8 – Addressing whistleblower reports

**KEY STEPS TO
BRIDGE GAP**

CURRENT STATE

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

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.

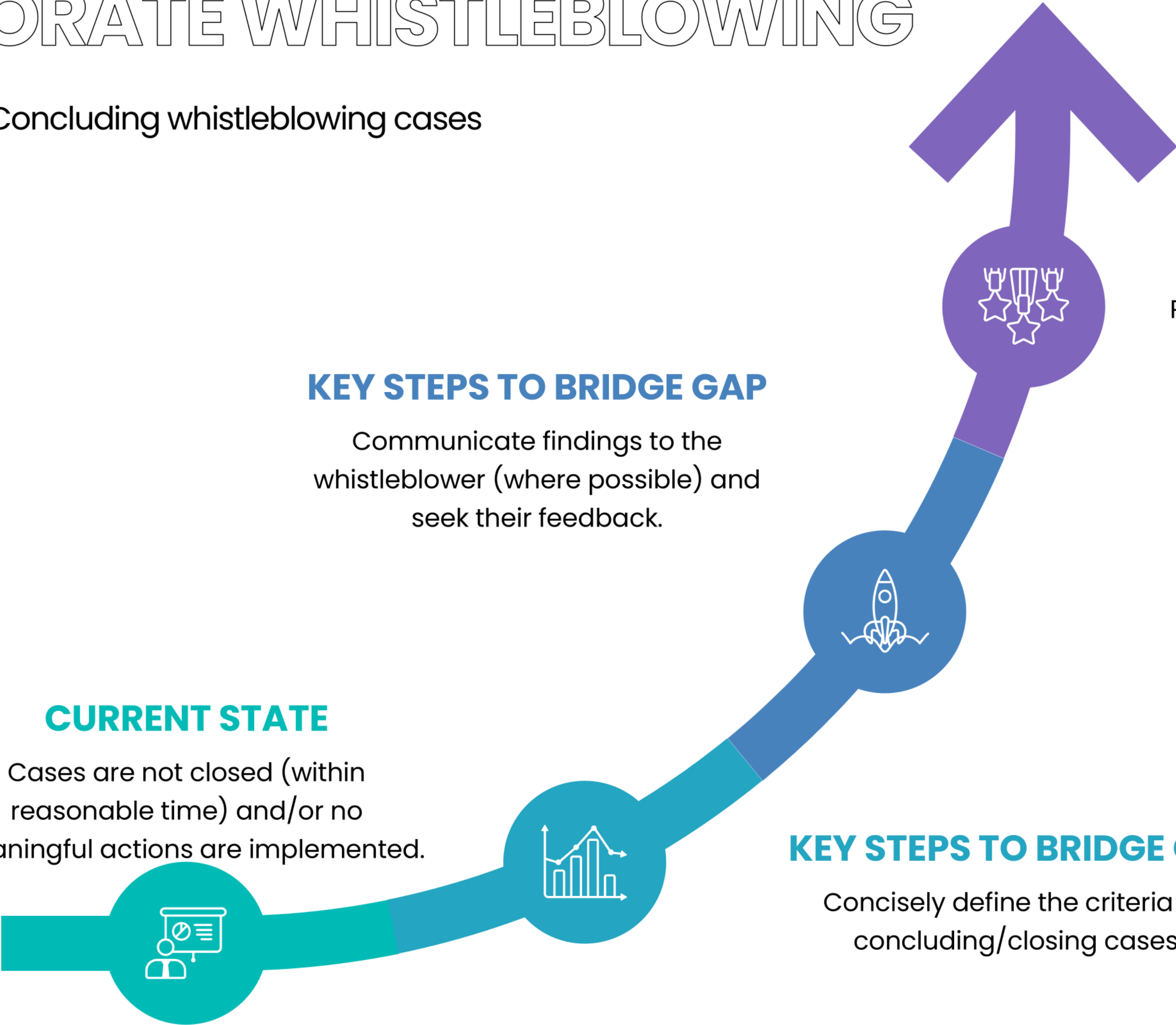
Communication should be regular, including at material progress steps.

DESIRED STATE

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

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Pro tip #9 – Concluding whistleblowing cases



CURRENT STATE

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

KEY STEPS TO BRIDGE GAP

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

KEY STEPS TO BRIDGE GAP

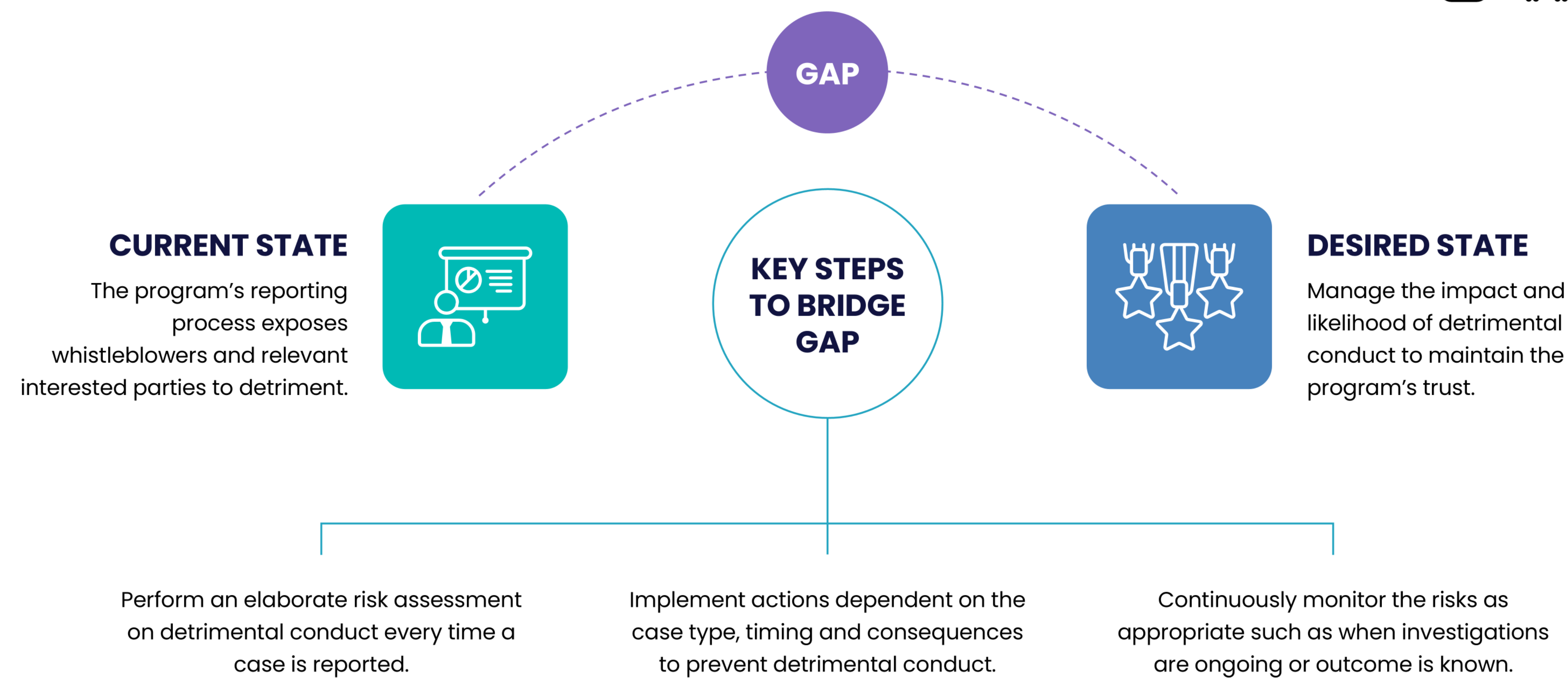
Concisely define the criteria for concluding/closing cases.

DESIRED STATE

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



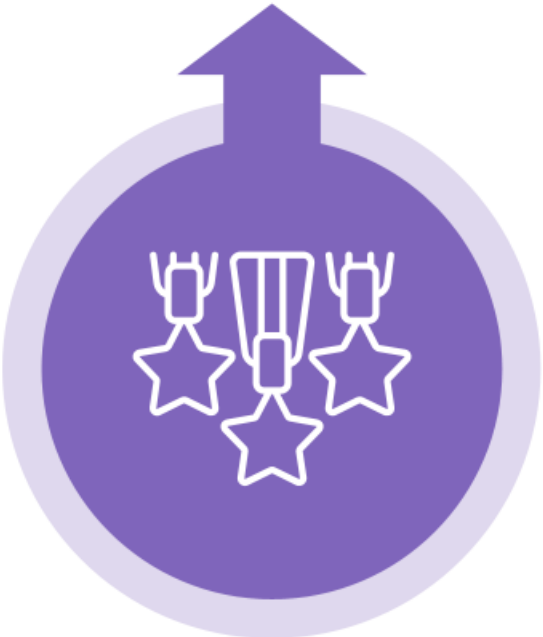
Pro tip #10 – Assessing and preventing risks of detrimental conduct



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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.





Pro tip #12 – Monitoring and auditing





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

CURRENT STATE

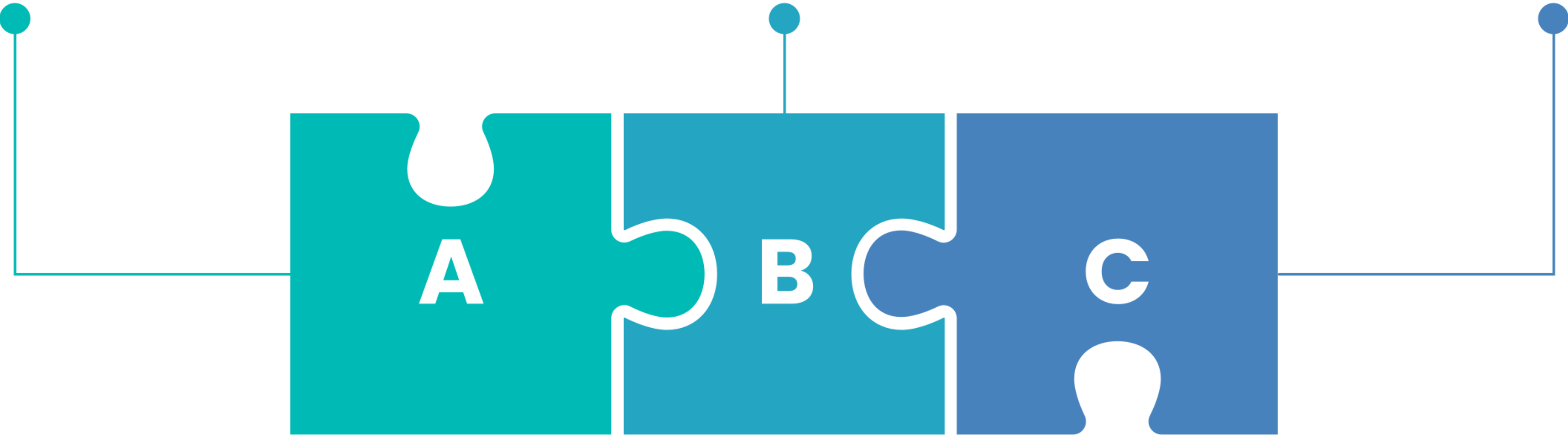
Comprehensive processes for receiving, assessing, addressing and concluding whistleblower cases have not been implemented.

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.



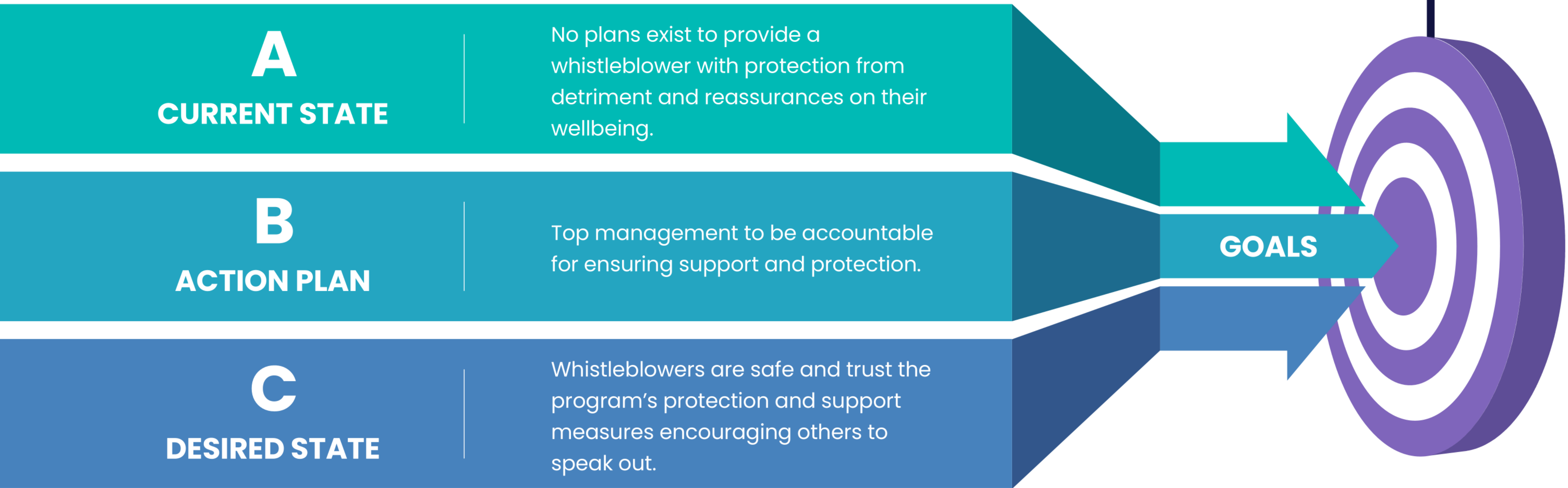
Acknowledgement of receipt should be timely.

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

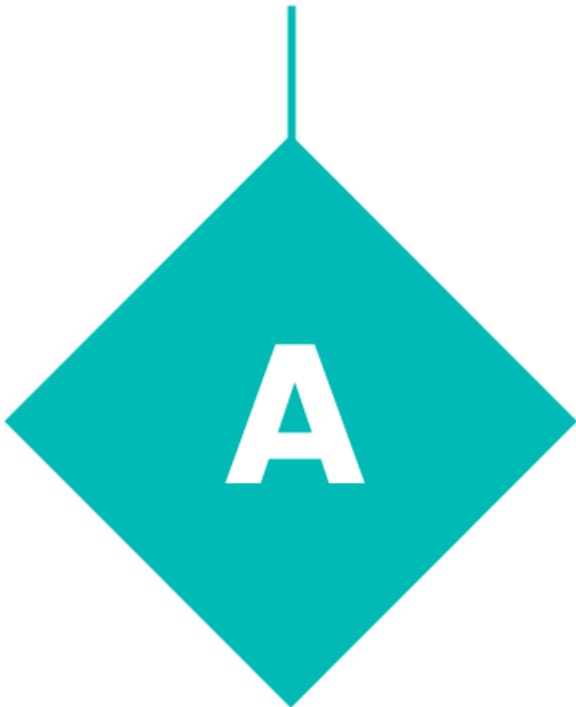




Pro tip #15 – Implementing a retaliation response system

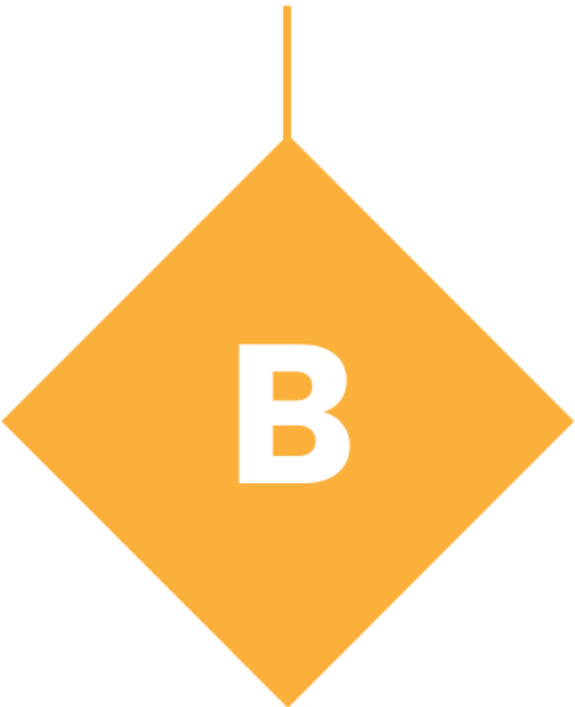
CURRENT STATE

Anti-retaliation measures do not exist or are deficient.



DESIRED STATE

Managed victimization risk enhances the program's trust.



1. Retaliation reporting channels are known and accessible.



3. Root cause analysis for retaliation cases is performed.



5. Ongoing contact with reporter is maintained.

2. Investigations are unbiased.

4. Strict case confidentiality.

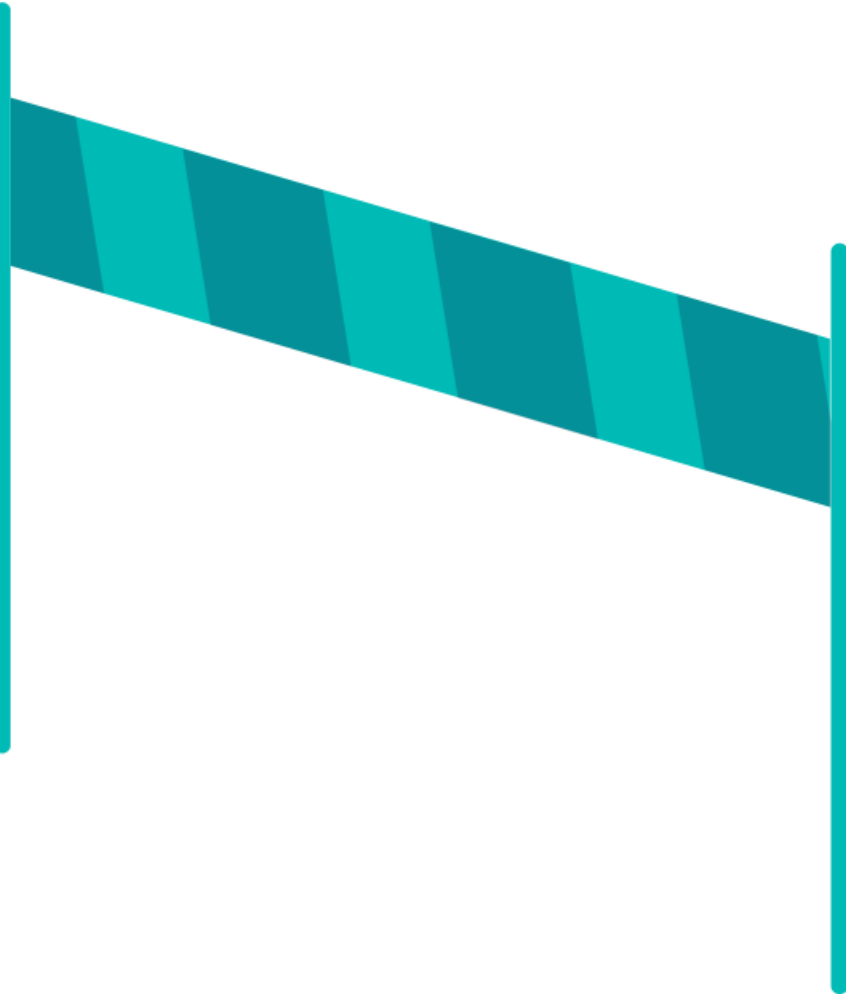
6. Proposed discipline is independently reviewed.



Pro tip #16 – Fostering a “Speak Up” culture

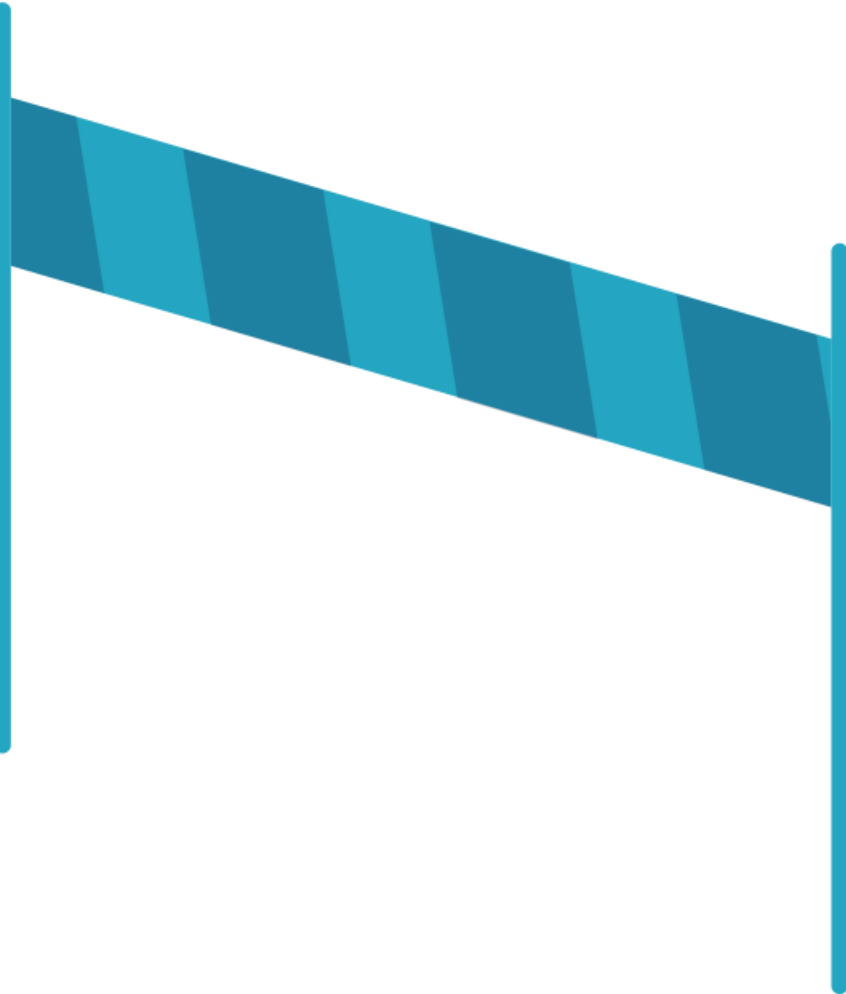
CURRENT STATE

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



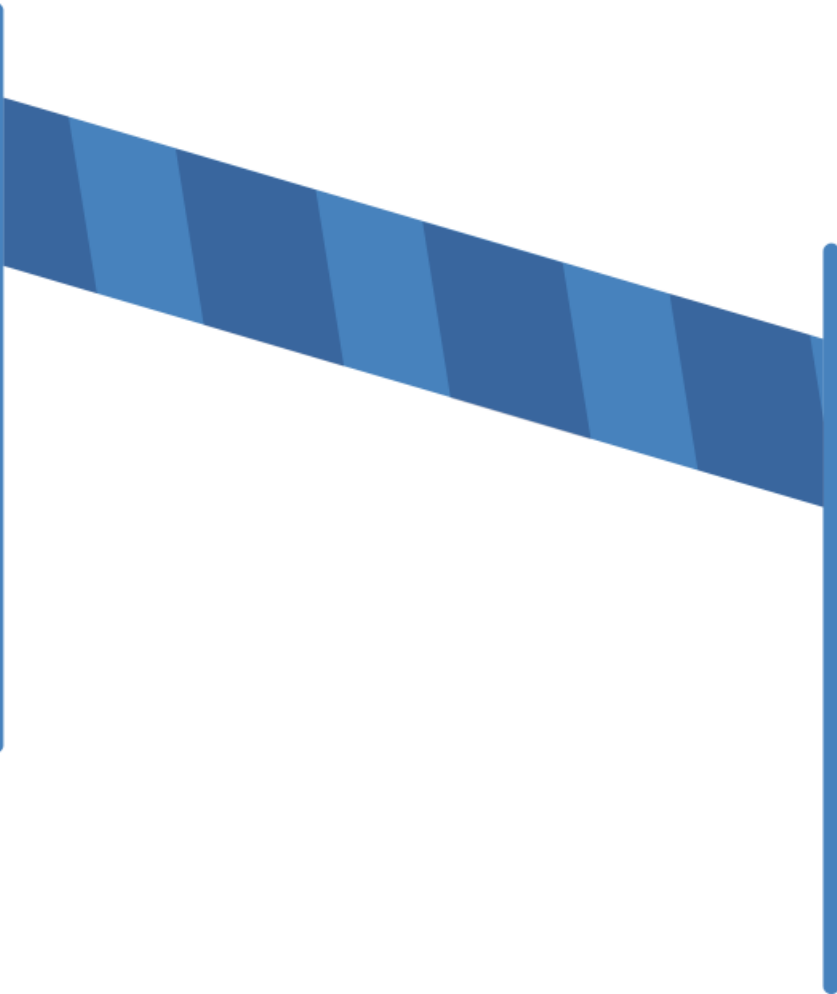
ACTION PLAN

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



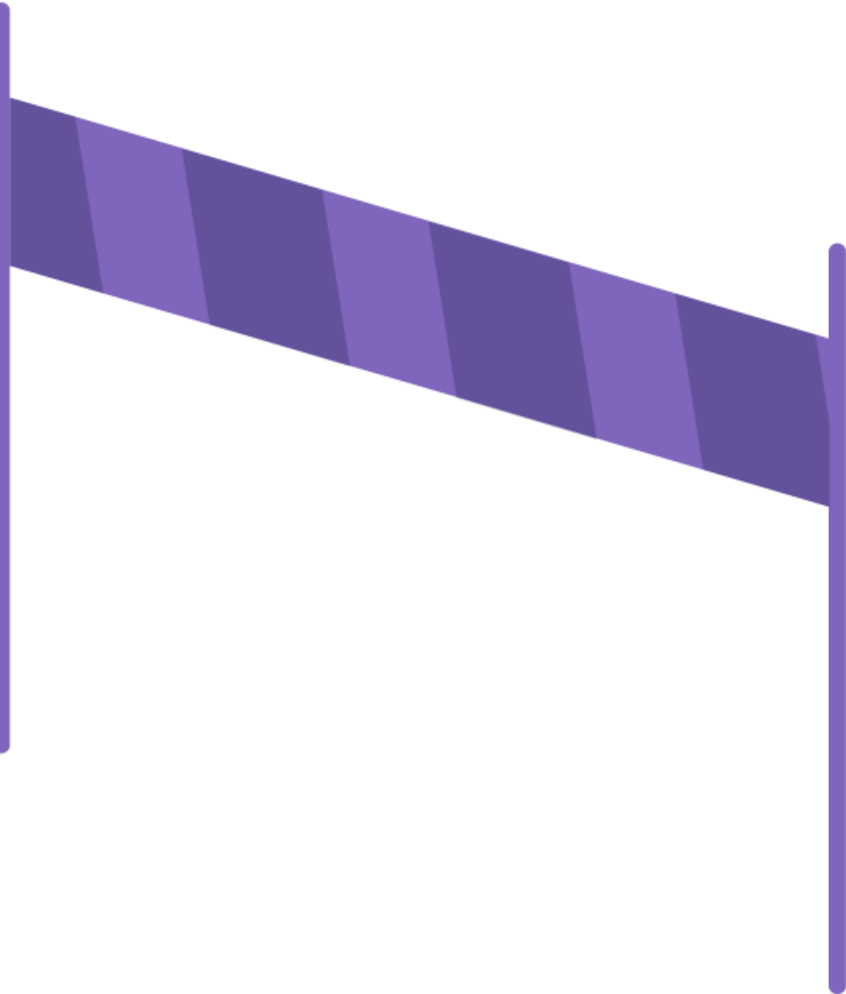
ACTION PLAN

- 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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