

Checklist

This checklist provides you with an overview of the critical points to consider when introducing and implementing the policy under the Whistleblower Protection Act.

1. Establish a Reporting Channel.

Provide your employees with the means to submit reports confidentially and securely. Automated processes can ensure effective collection and handling of reports. Reports should be documented anonymously, but also traceable.

2. Build Internal Know-How.

Ensure that your company possesses the necessary knowledge and resources to establish an internal reporting system. If needed, consider involving external experts to facilitate efficient setup and operation of the reporting system.

3. Define Responsibilities.

Clearly define which internal employees are responsible for matters related to the Whistleblower Protection Act. Consider outsourcing these responsibilities to specialized service providers if necessary to ensure compliance with legal requirements.

4. Engage External Support.

Hire an experienced service provider to facilitate the implementation of the Whistleblower Protection Act. Ensure they have comprehensive knowledge of whistleblower protection and legal requirements. Clarify the roles of the service provider and establish clear communication channels. A written contract is crucial and should cover the scope of services, confidentiality, data protection, liability, duration, compensation, and other details to protect your interests.

5. Establish Processes.

Restrict the individuals with access to incoming reports to prevent potential retaliation. Develop internal guidelines for the secure and confidential handling of reports. Define escalation pathways and clear investigative procedures in advance to ensure an appropriate response to reports.

6. Inform Employees.

Raise awareness among your employees about whistleblowing and encourage them to report violations. Involve employee representatives in the selection of the reporting channel to incorporate their perspectives. Inform your staff about the Whistleblower Protection Act and the use of the reporting channel, which should be easily accessible and up to date. Ensure that all employees know how to report misconduct securely and confidentially, including making anonymous reports. Provide clear instructions for submitting reports.

7. Appoint Ombudspersons.

Consider appointing an ombudsperson as an independent point of contact for whistleblowers. This neutral entity provides additional confidentiality and security. Ensure that the ombudsperson has the necessary powers and resources to investigate reports. Clearly inform your employees about this option. This contributes to effective investigations of reports and ensures appropriate measures are taken.

8. And get started

Once all necessary preparations have been made, you have done everything required and can now proceed without restrictions.