Implementing Whistleblowing Systems: Is Your Organization Ready?

The incoming EU Whistleblowing Directive 2019 will require many organizations* to make significant changes to protect whistleblowers against retaliation, establish confidential whistleblower channels and clear reporting processes. Organisations must implement arrangements now that enable employees to speak up about perceived wrongdoing. But how to go about this? This research examined key organizations in the finance, health, engineering and public sectors in several countries. Opportunities, challenges, common mistakes and best practices were studied, across different types of speak-up arrangements. The research was supported by the Association of Chartered Certified Accountants (ACCA) and the Economic and Social Research Council (ESRC).

Here are the recommendations for building an effective speak-up system:

1. **Offer a variety of speak-up channels.** These can range from online to telephone channels, involving both in-house and external recipients.
2. **Involve more than one function in your speak-up arrangement.** Disclosures often require input from multiple departments e.g. HR and compliance.
3. **Build trust through speak-up arrangements.** Trust is crucial in encouraging employees to speak-up. It must be earned by the organization, and conscientious implementation of effective speak-up arrangements can help.
4. **Be responsive.** Responsiveness is not a given. It needs to be well organised, clearly mandated, and adequately resourced. Training for recipients must be thorough. Follow-up activities must be planned and coordinated.
5. **Be aware of the barriers to responsiveness.** Legal limitations, invisible outcomes, and anonymous disclosures can be obstacles to perceived response. Develop strategies to account for this.
6. **Involve third parties wherever possible.** Involving third parties, such as unions, in the speak-up process helps improve trust and accountability.
7. **Record speak-up events, and ensure adequate reporting.** Recording all reports is essential for analysing patterns, problem areas within the organization, frequency and types of disclosures. Reports contribute to transparency across the organization.

Successful design and implementation of whistleblowing and speak-up systems is a complex process. It requires careful thought and sensitivity to a range of issues: cultural, structural and sectoral. This work provides a valuable guide for organizations who wish to be ready for the changes ahead.

*Public sector, companies with more than 50 employees, all firms operating in financial services or vulnerable to money laundering, and all companies with an annual turnover of €10m+.