WBS

WHISTLEBLOWING
PROGRAM
CHECKLIST

Wanting to improve your organisation?

Australia's first fully encrypted online whistleblowing service. True anonymous reporting, hiding personal data and metadata. Our systems are fully integrated with traditional telephone hotline.

Built around AS 8004_2003 Whistleblower Protection Programs for Entities, Organisations and People.

We listen, respect and protect your Organisation and People.

Establishing A Whistleblowing Program

A whistleblowing program starts with a clear management statement of commitment.

The elements provided in the checklist are consistent with quality outcomes and fundamental for a compliant and secure whistleblowing program.

This checklist is intended as a guide only.

GOVERNANCE

✓ **Appropriate governance**
- Committee to oversee reporting framework
- Independent group to receive and review reports about conduct
- All information communicated and stored securely

✓ **Appropriate systems and tools**
- Use the TOR web browser for high level encryption security, untraceable web traffic and secure loading of files
- File loading process remove all metadata as part of the pre-reporting process
- Service for assistance and technical issues separate to reporting channel
- Reports are based on system issues where possible, with examples to de-identify information sources from the information

✓ **Address low level of reporting**
- Information is provided to an external, independent and impartial third party with systems, skills and qualifications to:
  - protect identities and maintain trust
  - ensure all cases have been examined for wrongdoing and for systemic or systematic issues
- Adopt changes to facilitate/ensure effective reporting of wrongdoing
- Investigate the effectiveness of the whistleblowing process

✓ **Clear statement on relevant roles and responsibilities and accountabilities**
- From receiving information to finalising an investigation each step is overseen by different people to ensure confidentiality, independence and impartiality

SENIOR MANAGEMENT COMMITMENT

✓ **Clear statement from senior management of the organisation's commitment for acting on wrongdoing**
- Code of Conduct with clear commitments:
  - to maintaining a workplace free of unacceptable behaviour and misconduct
  - to reporting wrongdoing, investigating reports and rectifying proven wrongdoing
  - supported by defined ways for reporting conduct inconsistent with the Code of Conduct, while protecting people
- Policies evaluated for:
  - compliance with laws, standards and system effectiveness
  - practical effectiveness
  - confidence that anonymity can be protected
- Implement a system for reporting of illegal, inappropriate or unethical conduct

POLICY EFFECTIVENESS

✓ **The Code of Conduct and policy are owned by employees**
- Consult employees on their views on possible reporting mechanisms
- Ensure people are confident with the systems and protocols to protect their identity when they make enquiries or report
- Ensure the system is easy to use to limit risk of the anonymity being compromised

✓ **Clear guidance on conduct or behaviour that should and should not be reported using the porcess**
- Ensure the organisation's policy defines wrongdoing and reportable conduct is readily identifiable. Not all inappropriate behaviour is illegal and not all unacceptable conduct requires formal reporting via the whistleblowing procedures

AWARENESS

✓ **All employees have sufficient information to be able to effectively report wrongdoing**
- Ensure all employees are provided with the Code of Conduct
- Ensure the instructions are simple, apply on all platforms and are easy to use, to protect the identity of individuals
- Provide regular updates and feedback to promote the initiative and advise of changes

✓ **The policy is clear on wrongdoing and the processes**
- Ensure employees are aware of the processes used to protect their identity
- Ensure employees are aware of the actions the organisation may/will take in response to the information
- Ensure the organisation's policy clearly states when an investigation will be carried out and the processes it will follow
- Communicate how outcomes will be reported and who will receive those reports

ENGAGEMENT

✓ **The policy and systems clearly spell out the respect afforded to people**
- Protections from victimization are enshrined in the including appropriate independent, support and protection
- Assistance available to a person accused of wrongdoing, once the investigation has commenced
- Clear communication to all parties participating in an investigation about each step, including where misconduct is proven

Ready to protect your organisation?

SPEAK CONFIDENTIALLY TO AN EXPERT

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