

LISTENING FOR THE WHISTLE IN A PANDEMIC: TOP TIPS

1

PREPARE

Ensure your whistleblowing response policies and protocols are clear, accessible and robust. Follow that plan when alerts arise, don't make decisions in crisis-mode.

2

TRIAGE

Confirm that your whistleblowing response is geared towards assessing and prioritising the most enterprise-critical matters, and assigning the correct level and type of response and resource.

3

DOCUMENT

It's not just what steps you take, it's the record you keep. Ensure a comprehensive decision log and audit trail of the investigation is kept. Identify what documentation should be legally privileged.

4

TIMING

Act with speed but not haste. The longer you leave your whistleblower waiting for a response, the higher the risk they will go elsewhere with complaints, but over-eager responses before full information is gathered can lead to future problems.

5

EXPERTISE

Ensure your investigations process and team contains, or is advised, by relevant experts who work closely together, taking account of the employment, data protection, legal and reputational risks.

6

ATMOSPHERICS

Remember that business is a human institution, and blowing the whistle can be a traumatic and stressful experience. Say thank you, be kind.

7

MOTIVES

Do not expect purity of cause from a whistleblower: their motives may be mixed. Having an ulterior or additional motive is not a barrier to whistleblower protection.

8

RECOGNISE

Whistleblowers do not always declare themselves as such. Be guided by the test, and not the label: reasonable belief in public interest and wrongdoing (financial services firms don't forget the FCA's test).

9

COMMUNICATIONS

Strive for openness and transparency, and remember that communication is a two-way street. Share information where possible and sensible.

GET IN TOUCH



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