

EBBEN Whistleblowing Process©

Trusted | Compliant | Effective



Whistleblower



Disclosure



Hotline



Hotline Committee



Investigation

<p>Employees and stakeholders may protect an organisation against reputational loss and other risks, simply by reporting wrongdoing to an <i>internal ethics hotline</i>.</p> <p>If the organisation fails to address the wrongdoing, the hotline will be the last resort before the whistleblower informs a journalist or the authorities.</p> <p>The key requirement to any whistleblowing process is <i>trust</i>.</p> <p>During every step of the reporting process the <i>protection</i> of the whistleblower must be a top priority.</p> <p>Employees who disclose in good faith must be <i>protected</i> against retaliation.</p> <p>Since one out of every three disclosures come from outside the organization, the hotline should be open to <i>external stakeholders</i>.</p>	<p>The hotline is <i>accessible</i> 24 hours per day, every day of the week.</p> <p>The information in the hotline is provided in all company <i>languages</i>.</p> <p>The hotline will treat the identity of the whistleblower and the disclosed data as <i>confidential</i>.</p> <p>The whistleblower may decide to remain <i>anonymous</i> and not disclose name or email-address when filing the report.</p> <p>Victims of harassment may file their allegation in <i>escrow</i> to an independent escrow agent. He or she will inform the Hotline Committee only if and when two other corroborating allegations have been received.</p>	<p>To maximize protection, the hotline must be hosted by a <i>trusted third party</i> on an external server.</p> <p>When a new disclosure comes in, the Hotline immediately warns the Hotline Committee.</p> <p>The IP-address from where the notification was made is not visible.</p> <p>All data in the hotline is <i>encrypted</i> and the key is only available to the whistleblower and to the Hotline Committee.</p> <p>For every notification, the hotline creates a unique <i>chatroom</i> with a password. Here the whistleblower and the Hotline Committee can securely exchange questions, answers and documents, also in case of an anonymous notification.</p> <p>The hotline offers <i>case management</i> by giving structured access to the disclosures, for example timing, questions, answers, data, etc. Further, it shows the progress of the handling of the case.</p>	<p>The Hotline Committee makes an initial <i>assessment</i> of the notification and decides on the follow-up.</p> <p>The Hotline Committee starts an internal <i>investigation</i> of the case. For more complex investigations they may call upon internal and/or external professionals.</p> <p>In specific situations it may be advisable to refer the case to a law firm, and benefit from the <i>attorney-privilege</i>.</p> <p>Further to an internal investigation, the Hotline Committee takes appropriate <i>action</i>: control damages, dismissal, file complaint, etc.</p> <p>In specific situations the Hotline Committee may have to inform the <i>authorities</i>, for example on market abuse, insider trading or money laundering.</p>	<p>For the internal investigations of the incoming notifications the organization has access to forensic tools and techniques. Examples are:</p> <p><i>Data acquisition and data recovery</i>, to retrieve data from the organization's systems such as mail server, data server, personal computers and other devices.</p> <p><i>E-discovery and data analytics</i>, to search large volumes of data for information, and to analyse the obtained information.</p> <p><i>Open source intelligence</i>, to obtain data from outside the organization regarding for example ownership, mandates, family ties, etc.</p> <p><i>Interviewing</i>, to obtain explanations and background information on contracts, transactions, vendors and individuals.</p> <p><i>Reporting</i> on findings, verbal and in writing.</p> <p>EBBEN Partners can provide organizations with full forensic support. info@ebbenpartners.nl www.ebbenpartners.nl</p>
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