Do you represent an organisation?

5 Challenges for Public and Private Entities with Internal Whistleblowing Channels

Challenge 1: Knowledge protects whistleblowers: make communication about the whistleblowing channel clear and accessible

Trust begins with knowing how and when one can report safely. If you represent a public or private entity required to set up an internal whistleblowing channel, take this challenge by developing a clear and inclusive **communication strategy on the existence and use of your reporting channel.**

This strategy should include:

- **A dedicated web page with comprehensive, accessible information on how the channel works, and with content tailored for people facing greater risks (e.g., due to gender or intersecting vulnerabilities).** This page should clearly illustrate all phases of reporting (before, during, after); be in formats accessible to persons with visual, cognitive, and language disabilities; use plain language; include a gender perspective by explicitly addressing gender-related forms of retaliation and the intersection with other vulnerability factors (sextortion or multiple discrimination).
- **Practical examples and step-by-step instructions before and during reporting,** through FAQs, guidelines and drafting tips.
- Full information about **all available modalities to file a report**, including for people without digital access, while ensuring maximum confidentiality.

Who this is for: Public and private entities obligated (or choosing) to activate an internal channel.
Stakeholders to involve: Disability rights organisations, inclusive communication experts, civil society groups interested in whistleblowing.
What to publish: A dedicated page that visibly addresses the above criteria.
Outcome: Entities that meet the criteria can publicly state they've joined Challenge 1 of Open The Whistle.

Challenge 2: **Build capacity for investigations: training, case-based simulations, and attention to vulnerabilities**

Handling a report is delicate and impactful. It's not only about verifying facts, but also protecting the life plans and dignity of all people involved.

Every organisation should offer or participate in **specific training for those managing investigations**. This training should:

- Go beyond legal frameworks.
- Include real-world case simulations.
- Focus on ethical dilemmas and successful practices.

Civil society organisations can help highlight the human side of whistleblowing and embed a whistleblower-centered perspective into this training.

Finally, those conducting investigations need to be aware that the impact of a report may change according to gender and other vulnerability factors. Training is needed to help recognise this and take it into account in operations.

> **Who this is for:** Professionals involved in post-reporting phases.
> **Stakeholders to involve:** Case-based trainers, inclusive communication experts, civil society groups, legal and HR representatives.
> **What to publish:** On the whistleblowing page, provide details of training sessions delivered to this specific group.
> **Outcome:** Entities that comply can state they've joined Challenge 2 of Open The Whistle.

Challenge 3: **Privacy is not a clause: co-develop guidelines that really protect**

Protecting confidentiality in whistleblowing means balancing privacy with effective support. These two needs must not contradict each other, yet national laws transposing the Directive often remain vague on this topic.

We call on national data protection and whistleblowing authorities (or a unified body, if they coincide) to co-develop clear, sound guidelines on personal data

protection for all actors involved in protecting whistleblowers in different capacities.

Starting from the legal framework of each country, we call for the **joint development of guidelines** on how to handle privacy by all persons and entities involved in protecting whistleblowers: authorities, public or private entities, facilitators and support centres. The aim is to ensure that all those involved in the protection of the whistleblower handle personal data in a limited, but safe and accurate way. These guidelines must then undergo a **public consultation** process, to be attended mainly by those civil society organisations offering support services to whistleblowers, but also professional bodies, trade unions, legal advocates.

Who this is for: Data protection and whistleblowing authorities (or the same body, if they coincide).
Stakeholders to involve: Privacy and legal experts, civil society support organisations, unions, professional bodies.
What to activate: A public consultation process on privacy and whistleblowing.
Outcome: Those who lead or participate can declare they've joined Challenge 3 of Open The Whistle.

Challenge 4: **No one should face it alone: ensure visibility and access to support services**

Whistleblowers and retaliation victims often feel alone. Doubts, fear, and isolation are part of the process. Both may need support from people who can truly listen, guide them through the reporting process, and provide legal and/or psychological support.

We therefore encourage each organisation to **list available support services (both institutional and civic) on their whistleblowing page, such as legal and psychological assistance for potential whistleblowers or individuals facing retaliation.**

Who this is for: Public and private entities with (or planning) internal reporting channels.
Stakeholders to involve: Civil society organisations and institutions (e.g. Ombudsperson) offering legal or psychological assistance.

> **What to publish:** A list of available support centres.
> **Outcome:** Those who publish this list can state they've joined Challenge 4 of Open The Whistle.

Challenge 5: Measurement matters: assess and improve whistleblowing systems

Evaluating the **effectiveness and societal impact of whistleblowing systems** is key to building trust, making improvements, correcting weaknesses and strengthening protections.

We call on national whistleblowing authorities to strengthen **systems for collecting and analysing performance indicators, encouraging also public and private entities** with internal reporting channels to collect and report data.

Such data should then be widely disseminated, through **dedicated periodic reports** and, where possible, also by **returning data in open formats**. Data must be properly anonymised and every effort must be made to ensure that the publication of data does not, even indirectly, allow for the identification of the person who submitted the report, and to avoid presenting data in such a narrow or specific way that it could reveal their identity.

> **Who this is for:** National whistleblowing authorities.
> **Stakeholders to involve:** Public and private entities obligated (or choosing) to activate an internal channel, watchdog NGOs that oversee the fulfilment of the commitment.
> **What to publish:** Reports and open data on the effectiveness of whistleblowing systems.
> **Outcome:** Those who meet this standard can say they've joined Challenge 5 of Open The Whistle.

Are you an individual?

5 Challenges for Citizens

Challenge 1: **Help change the way we talk about whistleblowing**

Share Open The Whistle campaign content through your social media channels, mailing lists, and with your friends. Change starts with you.

Challenge 2: **Help change your workplace**

Spread the campaign at your workplace. Ask to print and display the Open The Whistle manifesto in a visible place. Advocate to ensure your organisation's reporting channel follows the guidance in the toolkit of Open The Whistle.

Challenge 3: **Help change the local conversation around whistleblowing**

Foster a public dialogue in your city between various stakeholders on how whistleblowers are perceived, in the style of Open the Whistle. Organise an event with public bodies, unions, local businesses, professional associations, journalists, and civil society organisations. Focus on how whistleblowing intersects with gender and vulnerabilities.

Challenge 4: **Monitor how local organisations implement whistleblowing systems**

Check whether and how nearby public or private bodies (e.g. municipalities, regions, health agencies, companies with more than 50 employees) are addressing whistleblowing. Use these four questions:

- Have they published the internal reporting channel?
- What tools are in place (digital platforms, alternatives)?
- Do they provide clear info on how to report and what happens next?
- Is privacy guaranteed?

Join others to write a collaborative monitoring report comparing different organisations in your area or field of interest.

Challenge 5: **Propose an Open Government action on whistleblowing**

The Open The Whistle toolkit includes many open government actions that public institutions and civil society can work on together.
Pick one and propose it to your local representatives to help make it happen.

www.openthewhistle.eu