

The GoodCorporation Whistleblowing Framework

GoodCorporation has developed this framework to help organisations ensure that stakeholders are able to raise concerns about the organisation’s activities without fear. This is best done through:

- encouraging an open-door culture of communication and consultation with stakeholders where they can raise concerns directly with managers
- implementing an effective grievance policy for employees’ personal grievances
- putting in place a trusted whistleblowing policy for serious concerns about dangers, risks, malpractice or wrongdoing, which stakeholders believe cannot be raised through any other means.

This framework can be used to design, embed or evaluate an organisation’s whistleblowing system and culture.

For evaluation purposes, it can be used internally as a checklist or as the basis of an external review. GoodCorporation’s independent assessment process looks at four levels of evidence for each practice in the framework and assesses each practice against a five-point scale:

The assessor checks:

- that a policy exists
policy documents are reviewed
- that a system is in place to implement the policy
systems are examined
- that records exist that show that the system works in practice
a sample of records is reviewed
- that stakeholders agree that the system works in practice
interviews are held with employees and other relevant stakeholders

The assessor awards a grade:

- best practice**
the policy and system are examples of best practice
- no action required**
the policy and system work well
- improvement recommended**
there is a policy and system that work but potential improvements have been identified
- action required**
there is a policy and system but they do not always work and require corrective action to reduce risk
- significant action required**
there is no policy or system, or it has largely broken down, and significant action is required to reduce risk

GoodCorporation helps businesses understand and manage their ethical risks by advising on best practice, helping them build appropriate practice into their operations and evaluating how well their processes are working.

Business ethics have been GoodCorporation’s sole focus since its foundation in 2000. Having completed over 500 assignments across 60 countries, GoodCorporation possesses unrivalled benchmark data and real insight into how different companies and industries meet business ethics challenges. This experience and data underpin the methodologies we have developed to support our clients in implementing the highest management standards.

The GoodCorporation Whistleblowing Framework

1. Leadership

- L1: The top management of the organisation demonstrates a clear commitment to an open-door culture where stakeholders can raise concerns without fear.
- L2: There are effective employee communication and consultation processes in place.
- L3: Employees and other stakeholders are encouraged to raise any concerns openly with the organisation's management.

2. Culture and awareness

- C1: The organisation's open-door policy and grievance policy are clearly communicated internally; the whistleblowing policy is communicated both internally and to third parties.
- C2: There is regular and clear training for employees on whistleblowing.
- C3: Line managers are trained on handling reports from their staff members and on safeguards for all those making reports.
- C4: Line managers are encouraged to refer cases of material concern to the investigation service.

3. Grievance policy

- G1: There is a clear written policy covering the raising and handling of employees' personal grievances.
- G2: The grievance policy includes a clear process to ensure that all grievances are fairly assessed and managed.
- G3: The grievance policy confirms that employees will not suffer detriment for having raised a legitimate grievance.

4. Whistleblowing policy and management

- W1: There is a clear whistleblowing policy covering the raising, handling and investigation of serious concerns.
- W2: The whistleblowing policy identifies to whom concerns should be raised and how they should be raised.
- W3: The whistleblowing policy sets out how and by whom concerns will be handled and investigated.
- W4: The whistleblowing policy informs whistleblowers that they are entitled to independent advice and support and explains how to access it.
- W5: The whistleblowing policy makes clear whether anonymous reporting is allowed and how it will be handled.

- W6: Whistleblowing is managed independently from the day-to-day running of the organisation.
- W7: The whistleblowing facility covers the disclosure of dangers, risks, malpractice or wrongdoing that affects others.
- W8: The whistleblowing channel is available and communicated to all relevant stakeholders.

5. Whistleblowing investigations

- I1: Investigations are carried out confidentially, thoroughly and impartially.
- I2: Whistleblowers are given the opportunity to speak to investigators to explain their concerns.
- I3: Proper records are maintained for all cases and investigations.
- I4: Whistleblowers are kept informed as far as possible about the investigation process and its outcome.
- I5: The whistleblower's identity is kept confidential if requested, unless disclosure is required by law.

6. Avoidance of detriment

- D1: Whistleblowers are supported and do not suffer detriment for having raised a concern, unless it is proven that the whistleblower knowingly provided false information.
- D2: Any employee who subjects a whistleblower to detriment for raising a concern is subject to sanctions.
- D3: Whistleblowers are encouraged to report any detriment suffered for having raised a concern.

7. Feedback, monitoring and independent oversight

- M1: The organisation conducts periodic audits of the effectiveness of its approach to receiving and handling concerns, grievances and whistleblowing cases.
- M2: The organisation obtains feedback from employees on a periodic basis on the awareness and effectiveness of its open-door culture, grievance policy and whistleblowing policy.
- M3: The organisation's published annual report includes information about the effectiveness of the whistleblowing policy.
- M4: There is independent oversight and review by the Board (or equivalent body) of the organisation's approach to receiving and handling concerns, grievances and whistleblowing cases.