



(One-Page Guide)

Implementing a Whistleblowing Program: Organisational Do's and Don'ts

A well-designed whistleblowing program is a cornerstone of strong governance, ethical culture, and organisational resilience. The following best practices outline what organisations should—and should not—do when establishing or improving their whistleblowing framework.



Do's

Establish Clear, Accessible Reporting Channels

Provide multiple, easy-to-use avenues for reporting concerns (e.g., secure whistleblower platform, hotline, external reporting provider, protected email). Ensure access for all employees, contractors, and relevant third parties.

Set a Strong Tone From the Top

Demonstrate leadership commitment through clear communication that whistleblowing is valued, protected, and essential to good governance. Leadership should model ethical behaviour and reinforce non-retaliation.

Create a Robust Non-Retaliation Framework

Define retaliation clearly, prohibit it explicitly, and implement processes for monitoring and responding to any instances. Ensure whistleblowers can report retaliation through separate confidential channels.

Protect Confidentiality and Anonymity

Implement secure systems and protocols allowing confidential or anonymous reporting. Limit access to case information to authorised personnel only.

Train Managers and Staff

Provide regular training so employees understand how and why to report concerns. Equip managers with the skills to respond appropriately, escalate issues, and maintain confidentiality.

Develop a Standardised, Fair Investigation Process

Define how cases will be triaged, assessed, investigated, documented, and resolved. Use trained, impartial investigators and ensure transparent documentation of decisions and outcomes.

Communicate the Program Regularly

Promote the whistleblowing channels through onboarding, intranet, posters, team meetings, and leadership messaging. Reinforce that the program exists to protect the organisation and its people.

Track, Analyse, and Improve

Monitor trends, root causes, case timelines, and resolution quality. Report insights to leadership and use them to strengthen processes, controls, and culture.

Don'ts

Don't Rely on a Single Reporting Channel

One method—such as telling employees to “speak to their manager”—is insufficient and can deter reporting. Offer multiple options, including external and anonymous routes.

Don't Ignore Cultural and Psychological Barriers

Fear of retaliation, mistrust of leadership, or perceived lack of action can undermine the program. Address these proactively through communication, fairness, and consistent follow-through.

Don't Allow Conflicts of Interest in Investigations

Avoid assigning cases to managers or departments that may be implicated, biased, or too close to the issue. Independence is essential to credibility.

Don't Over-Promise Outcomes

Avoid guaranteeing that whistleblowers will receive full updates or that all reports will lead to disciplinary action. Set realistic expectations while emphasising fairness and confidentiality.

Don't Delay Action

Slow response times erode trust. Ensure reports are acknowledged quickly, triaged promptly, and monitored throughout their lifecycle.

Don't Forget External Obligations

Ensure compliance with legal requirements (e.g., regulatory reporting, data protection, employment law). Maintain documentation that demonstrates due diligence.

Summary

A successful whistleblowing program blends strong governance, clear processes, employee trust, and leadership commitment. By following these organisational best practices—and avoiding common pitfalls—an organisation can embed a culture where concerns are raised safely, addressed fairly, and used to drive continual improvement.