



**Workshop 1:  
Whistleblowing – over- or underrated?**

Whistleblowing, a Panacea for Crisis Prevention ?  
German experiences for a pay-off in the public sector.

# Whistleblowing Pay-Offs



## Overview

- A Whistleblowing System's Place
- Risk Information and Risk Communication
- Best Practices and Measuring Success
- Whistleblowing – Condition Sine Qua Non, But No Panacea !
- Tone at The Top, or Tone FROM The Top
- The Whistleblowing Ombudsman – The German Flavour
- A Benchmark for Effective Whistleblowing Systems
- The Payoff in the Public Sector

## **“Whistleblowing System” – where does it belong ?**

A “Whistleblowing System”

- As “internal communication about risks” → part of any risk management system;
- Has always existed – as we learn in folk lore;
- Now considered best practice in integrity / compliance systems.

Your institution already has a Whistleblowing System, too !

But is it efficient – and “systematic” ?

How would YOU benchmark it ?



## What is a whistleblowing system ?

A whistleblowing system is made up of all internal and external channels and structures carrying, and generally facilitating communication about risks – and opportunities (both “deviations”).

The *object* of risk communication is *information*, possibly beneficial to the identification of risks/opportunities.

*Subjects* of risk communication are the owners and beneficiaries of risk information, or more generally the stakeholders.

A „hotline“ as such is evidently *not* a „whistleblowing system“,  
- rather a potential part of it – if and inasmuch as it facilitates risk communication.



## **Whistleblowing System - Measuring Its Success**

- Define *all* potential sources, objects and subjects;
- Define *all* potential bottlenecks;
- Define *all* formal and informal existing channels and their by-passes;
- Measure the actual usage of channels and by-passes;
- Estimate climate and tone from the top;
- Have employees and independent experts estimate extent to which risk information is totally or partially held back or tabooed;
- Don't underestimate withholding tendencies due to "efficiency" etc.;
- Note past "incidents," communication crises, and crisis communication.
- Measure flow and internal/external ratio for efficiency;
- Compare outcome with past experience for a tendency.

## **Three good reasons, why “whistleblower protection” doesn’t protect.**

- Whistleblowing is misjudged as personal aggression or *complaint*;
- Whistleblowers use an “exception cycle” – and are blamed for it;
- “protection for compliance” sends all the wrong signals.

## **Three suggestions, if no one calls.**

- Ask – or, better have someone ask, what people need before calling;
- Consider you may not have addressed the real system impasse, yet;
- Try to find out *where* the risk information really flows (if it ever does).

- **Risk Communication – what works and why.**
  - The manager specifically requests it, and is known to process it → trust;
  - Gossip and external pipelines → anonymity;
  - Top down – authority.
- **Risk Information – a new currency in the public sector ?**
  - Not so new, if you agree that risk management has *always* been a strong focus of the public administration;
  - Possibly new, if bottom-up and network communication is newly included;
  - Indispensable, if complexity of modern governance is fully understood;
  - Simply an important element for resilience and flexibility !
  - Might restore credibility and democratic legitimation.
- **Risk Communication Capacity - a new benchmark for the Public Sector**



- Tone AT the top, tone FROM the top – what's the difference ?

A story from within ...



## The External Ombudsman – the German flavour

- At the interface between inner and outer side;
- As an attorney with attorney privileges;
- With credible independence;
- With mediation, coaching, and management skills;
- A translator between perspectives and cultures;
- Dependent on access to the top executives;
- Now a German Standard.

### Ideal, **if indeed**

- accepted by the executives *as well as by* staff members,
- continuously engaged in formal and informal communication;
- allowed to deliver visible results.



## **Benchmarking elements for an effective whistleblowing system in the public sector:**

- Clearly defined communication channels;
- Strong incentives on executives to make use of new information;
- Clear rules on what will happen with information;
- Clear and immediate feedback to whistleblower;
- In case of doubt, choice of channel in responsibility of whistleblower;
- Informal (external) advice from ombudsman offered;
- Option to use ombudsman at will;
- Option to use other external channels and realistic (extreme) circumstances;
- Transparency.

# Your contact

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**RISK  
COMMUNICATION  
CONCEPTS**

## >>> **RCC Risk Communication Concepts**

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