



Thank you for joining us!

The presentation will begin shortly

How to Set Up a World-Class Whistleblower Program

Part 2: Fireside Chat with Jeff Tenenbaum

Wednesday, September 6th, 2023



CPAs & ADVISORS

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Presenters

Meet the instructors



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Housekeeping

Additional Information

Learning Objective To provide attendees with a road map on how to implement a whistleblower program.	Instructional Delivery Methods Group Internet-based
Recommended CPE 1.0 CPE Credit	Recommended Fields of Study Specialized Knowledge
Prerequisites None required	Advance Preparation None
Program Level Basic	Course Registration Requirements None
Refund Policy No fee is required to participate in this session.	Cancellation Policy In the event that the presentation is cancelled or rescheduled, participants will be contacted immediately with details.
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Want more?

Join us for part 3 of this webinar series, coming this November!



A photograph of two people sitting at a wooden table outdoors. The person on the left is wearing a white short-sleeved shirt and a necklace. The person on the right is wearing a dark suit jacket and is pointing at a tablet. On the table are a laptop, a smartphone, sunglasses, and a folder. The background is a blurred outdoor setting with greenery.

Recap from Part 1

Current Landscape



Digital transformation and incorporation of new technologies into business processes



Changes in frameworks and regulations (IIA 3 Lines Model, COSO Fraud Risk Management Framework, EU Whistleblower Directive, ESG)



Enhanced reputation risk



Fraud Deterrence Now and in the Future

Deterrence is also supported and enhanced by the knowledge throughout the organization that:

Those charged with governance have made a commitment to comprehensive fraud risk management.

Periodic fraud risk assessments are being conducted

Fraud preventive and detective control activities are being conducted

Suspected frauds are investigated quickly

Fraud reporting mechanisms are in place

Discovered frauds are remediated thoroughly

Wrongdoing has been appropriately disciplined

The entire Fraud Risk Management Program is being constantly monitored

Beyond Fraud

Whistleblower programs can be effective in uncovering wrongdoing and promoting accountability in various areas beyond financial fraud.

- **Workplace Safety Violations:** Whistleblower programs have proven effective in exposing workplace safety violations that can lead to hazardous conditions and endanger employees' well-being.
- **Environmental Protection:** Whistleblowers have played a crucial role in uncovering environmental violations and promoting environmental protection.
- **Safety and Quality:** Whistleblower programs can help identify safety concerns and quality issues that may put people at risk.
- **Academic Misconduct:** Whistleblower programs within educational institutions have been effective in uncovering academic misconduct, plagiarism, and research fraud.

Where to Start

- Perform a baseline assessment of policies and procedures from Human Resources, legal, anti-fraud program, and other applicable sources
- Baseline policies (hopefully) already in place:
 - Code of Conduct
 - Whistleblower Policy
 - Conflict-of-Interest Policy
 - Information Security Policy



Let's Focus on the Whistleblower Policy

- Elements of a whistleblower policy:
 - Introduction – what purpose does the policy serve?
 - Scope – who/what does the policy apply to?
 - Definitions – how does the organization define a whistleblower, wrongdoing, reporting channel, etc.
 - Reporting Process – step-by-step process detailing how a whistleblower can/should submit complaints



Let's Focus on the Whistleblower Policy

- Elements of a whistleblower policy:
 - Confidentiality – statement that confidentiality will be maintained to fullest extent possible
 - Non-retaliation – statement regarding zero tolerance policy against whistleblower retaliation, actions to be taken against alleged retaliation, and consequences for retaliators
 - Investigation Process – step-by-step process detailing how management/Board will follow up on complaints
 - *This will be the focus of our follow up webinar*



Whistleblower Software Online Platform

These have grown in popularity due to anonymity, user-friendliness, streamlining of case management process, and affordability

Links can be provided through the organization's website to demonstrate commitment to fair practices and zero tolerance policy against fraud and other wrongdoing

Templated forms with customized data fields allow the organization to capture all relevant information in a standardized format

Automated notifications inform applicable personnel as soon as a complaint is received

User Access Rights can be assigned to internal and external members of investigative team to appropriately limit information they can/can't view

Allows for real-time communication with whistleblower in an anonymous format - platforms have the capability to scrub meta data ensuring anonymity



Due Diligence and Functionality

Due to the sensitivity of the information contained within these platforms, it's important to do the appropriate due diligence to ensure the platform complies with your organizational cybersecurity standards, as well as any applicable regulatory frameworks (i.e., GDPR)

- Any past issues with breaches?
- Issues with financial viability?
- Is the provider able to provide proof of compliance with best practice frameworks, pen testing, ongoing monitoring, etc.?
- Has this been reviewed/demoed by your IT department?

Other items for consideration:

- User friendliness and ease of managing user access rights
- Level of customization – breakdown by office, region, department, etc.
- Case management and communication with whistleblowers – is this provided through the platform or is it solely for reporting?



Benefits of Internal Whistleblowing Systems

Internal whistleblowing systems provide real and highly valuable benefits to organizations of all types



Fireside Chat

What to expect

We would like today's fireside chat to be as interactive as possible - we're here to address what's top of mind for YOU:

- We will start by addressing questions that our clients routinely ask when establishing/improving their whistleblower program
- Use the chat and Q&A functions to submit questions/comments during the fireside chat
- We will do our best to address all items submitted but if we can't get to it in our allotted time, we will keep a record of the questions and provide a response following the webinar

Rough breakdown of topics and timing:

- Legal and Compliance considerations when establishing your whistleblower program (15 min)
- Investigations – where to start and what legal/compliance requirements to be aware of (15 min)
- Closing Remarks, Resources, Q&A (10 min)



Whistleblower Resources



[ACFE Building a Best-In-Class Whistleblower Hotline Program](#)



COSO Fraud Risk Management Resources:

- [COSO and ACFE Fraud Risk Management Guide - Executive Summary](#)
- [IIA COSO Fraud Risk Management Update](#)



[ISO 37002:2021 Whistleblower Management Systems - Guidelines](#)

Additional GRF Resources



[Secure Whistleblower Investigation Services](#)



[Try an Online Demo of Whistleblower Software](#)



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[Article: How Internal Audit Can Support Whistleblower Investigations](#)



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Questions?

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