Speed training on whistleblowing

DPO-EDPS meeting
28/04/16

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What?

• Visibility to unethical behaviour in the workplace

• Serious wrongdoings and irregularities

• Sensitive personal information per se
How?

• Protect the whistleblower
  - not reveal identity
  - strictly limit the access
  - store files securely

• Specify the purpose
  - serious wrongdoings and irregularities
  - personal interest in the outcome - not within the scope
  - encourage non-anonymous reporting
How?

• Avoid to process excessive personal information
  - clearly no relevance to the accusations

• Inform all the involved parties
  - whistleblower
  - alleged wrongdoer
  - witnesses
  - third parties
How?

- **Apply different conservation periods**
  - report not within the scope of the whistleblowing procedure?
  - closed after initial assessment?
  - relates to fraud – OLAF

- **Implement adequate security measures**
  - information security risk management - Article 22
  - the EDPS guidance on “Security Measures for Personal Data Processing (Article 22 of Regulation (EC) 45/2001)
More information:

- EDPS Reference Library
- Whistleblowing guidelines – on its way
- Article 29 Working Party Opinion 117
Thank you for your attention!

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