

Speed training on whistleblowing

EDPS



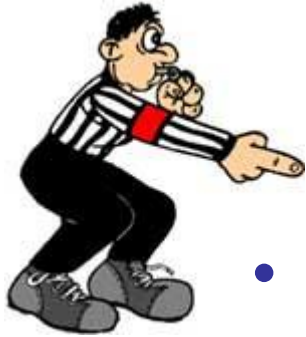
EUROPEAN DATA PROTECTION SUPERVISOR



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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