



INTEGRITY
AT WORK



**A MULTI-STAKEHOLDER INITIATIVE
PROMOTING SUPPORTIVE WORKING
ENVIRONMENTS FOR ANYONE REPORTING
CONCERNS OF WRONGDOING**

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WHAT IS INTEGRITY AT WORK?

Integrity at Work (IAW) is a not-for-profit, multi-stakeholder initiative aimed at promoting supportive working environments for anyone reporting concerns about wrongdoing.

IAW member organisations have a unique opportunity to demonstrate their commitment to promoting ethical workplaces and managing risk.

Members can avail of exclusive online resources, places at twice-yearly forums and an annual conference, tailored training, as well as assistance from international experts on ethics, responsible lobbying and anti-corruption.

Member contributions and donations help fund Ireland's only free specialist legal advice service for witnesses and whistleblowers which is accessed through the Speak Up helpline.

IAW is facilitated by the Irish chapter of Transparency International (TI) – the world's leading independent anti-corruption organisation.

The legal advice service is operated by Transparency Legal Advice Centre (TLAC), an independent law centre supported by TI Ireland.

THE NEED FOR INTEGRITY AT WORK

Employers are expected to invest more time and resources than ever before in addressing fraud and corruption, as well as risks to the environment and to the health and safety of the public. New legislation has placed added responsibility on organisations and those in positions of authority in business, government and the non-profit sector.

In particular, the Protected Disclosures Act 2014 (PDA) significantly changes the legal landscape and means that workers have better safeguards when reporting wrongdoing.

This might be viewed as a challenge for some employers. However, it can also be seen as an opportunity to restore trust, prevent financial losses arising from white collar crime, promote public health and safety and protect the environment.

IAW offers a new way for employers from the Irish public, private and non-profit sectors to discuss and embrace these opportunities. It offers the chance to learn about legal developments, strategies to promote ethical standards as well as legal compliance, and ways to restore trust among stakeholders.

This initiative will help make the availability of free legal advice on protected disclosures known to all workers in Ireland for the first time. In doing so, it will help ensure that workers make informed decisions before they report their concerns and have the support they need when they speak up.

IAW will also aim to make specialist guidance and training on whistleblowing, anti-corruption and responsible lobbying available to every organisation that needs it – irrespective of their financial means.

THE INTEGRITY AT WORK MEMBERSHIP PACKAGE

All IAW members receive comprehensive, tailored support from TI Ireland:

- The IAW Pledge: a unique opportunity to make a public statement about an organisation's commitment to establishing an ethical workplace.
- Participation in IAW Forums and annual conference.
- Specialist training and guidance on complying with the PDA and related standards.
- Resources including the IAW Guide for employers and the IAW Self-Assessment Framework.
- Support in raising workers' awareness of access to free specialist legal advice from TLAC and existing reporting channels.
- Tailored assistance including a Member Needs Analysis, stakeholder mapping, staff surveys and an annual review.
- Update webinar.
- Quarterly newsletter.

THE IAW PLEDGE, A COMMITMENT TO INTEGRITY

Members of IAW will be required to pledge that they will not penalise staff who make a report of wrongdoing and commit to implementing a set of policies and procedures on whistleblowing. The most senior staff member and board member of the organisation will also be asked to sign the IAW Pledge on behalf of their organisation.

The full text of the IAW Pledge is available on page 10.

FORUMS AND ANNUAL CONFERENCE

All members are invited to twice-yearly forums and an annual conference. Coordinated by TI Ireland, with guest speakers, experts and practitioners in attendance, the forums provide members with opportunities to network and discuss issues, under the 'Chatham House' rule. The forums will also provide an opportunity for members to suggest ways to develop and enhance the IAW initiative.

The IAW annual conference brings together senior executives from all sectors, with key-note speakers, panellists and break-out sessions for peer-to-peer discussions on whistleblowing and related ethical and compliance issues.

On the evening of the annual conference, TI Ireland will host its National Integrity Award which recognises individuals and organisations that have made an outstanding effort to promote accountability and transparency in public and corporate life in Ireland.

Additional forums and workshops can be organised on request.



TRAINING

Participating organisations will be entitled to an initial one-day training session for managers. Training on whistleblowing and protected disclosures, anti-corruption, responsible lobbying and ethics is available.

TI Ireland will undertake a Training Needs Analysis with Member organisations to identify appropriate attendees and develop a tailored training curriculum. Training is delivered by leading specialists on whistleblowing and corruption in Ireland who are QQI qualified.

RESOURCES

The IAW Guide for employers and IAW Self-Assessment Framework is exclusively available to IAW members.

The Guide assists employers in understanding the requirements of the PDA and with implementation of the IAW Pledge.

The Framework allows members to evaluate the completeness and effectiveness of their protected disclosures policies.

Full members are also licensed to use the IAW mark on relevant publications and reuse TI Ireland intellectual property on their website/intranet.

GUIDANCE

TI Ireland's anti-corruption and ethics experts can offer guidance to members on designing whistleblowing policies and procedures as well as on anti-corruption and ethics frameworks. IAW members will be entitled to two hours' policy advice at no extra cost.

Where a worker of an IAW Member is not satisfied with the response of a concern they have raised they can contact TI Ireland who may then contact the Member. TI Ireland will raise awareness of any systemic issues that might give rise to perceived failures to adequately respond to reports or to protect those making reports.

SUPPORT IN RAISING WORKERS' AWARENESS OF FREE LEGAL ADVICE AND REPORTING CHANNELS

In the event that a Member's workers need support in making a disclosure they may avail of free legal advice through the Speak Up helpline, Ireland's only free-phone information and referral service for

anyone facing an ethical dilemma or considering reporting wrongdoing at work. The helpline also offers access to legal advice from TLAC where appropriate.

The use of the Speak Up helpline and access to legal advice is available for free to individuals throughout the country. However, IAW members receive publicity materials (guides, posters and information leaflets) for distribution to staff to advertise the availability of the Speak Up helpline as well as existing reporting channels.

ANNUAL REVIEW

IAW members can also receive an annual review of helpline statistics, analysis and recommendations. This will help the Member organisation benchmark its performance against agreed standards and to inform compliance and risk assessments.

SURVEYS

TI Ireland can deliver surveys that provide members with a benchmark assessment of organisational culture that highlight compliance and ethical risks and attitudes to whistleblowers. Our surveys are designed to be relevant to the size of the organisation, the sector it operates in, as well as the risks it is exposed to. Surveys will generally involve a prior consultation, needs analysis, anonymous online questionnaire and two-hour workshop to discuss the findings with the organisation.

MEMBER NEEDS ANALYSIS

A Member Needs Analysis will also help identify members' needs using the IAW Self-Assessment Framework and stakeholder analysis of those internal stakeholders (staff and board members) that will be engaged as part of the IAW initiative.

UPDATE WEBINAR AND QUARTERLY NEWSLETTER

At the end of the first year of participation, TI Ireland provides an update webinar to cover relevant judgments and published codes or guidance. In addition, a quarterly newsletter provides details of developments and events around whistleblowing, anti-corruption and ethics.

THE INTEGRITY AT WORK MEMBERSHIP CYCLE

INTRODUCTION

The IAW Membership Cycle involves activities under six defined steps taking place over a twelve-month period.

TI Ireland will engage with any organisation from the private, public and non-profit sectors that signals its commitment to addressing the risk of wrongdoing and providing supportive environments for anyone reporting concerns of wrongdoing.

An initial due diligence assessment will be undertaken prior to an organisation being formally invited to become an IAW Member. TI Ireland will only consider those organisations that it deems to be prepared, and have the capacity, to commit to the IAW Pledge.

STEP 1: Associate Membership approval and commitment to the IAW Pledge

Participating organisations will be asked to sign a membership agreement that sets out the terms and conditions of IAW membership.

The most senior staff member and board member of the organisation will also be asked to sign the IAW Pledge on behalf of their organisation. At this point, the organisation becomes an IAW Associate Member.

STEP 2: Member Needs Analysis

TI Ireland's IAW team will complete an organisational profile with the Associate Member to help understand its key compliance risks and procedures. A stakeholder mapping exercise will also help identify the organisation's key stakeholders.¹ The Member will not be asked to share commercially sensitive information. A Training and Resource Needs Analysis will also be conducted.

¹External: prescribed persons, auditors, third parties authorised to receive a disclosure, regulators, government bodies, donors. Internal: persons who receive information, persons responsible for acting/investigating on reports.

STEP 3: Resources and Assistance

The Associate Member will be given access to resources to help improve the organisation's internal compliance and risk reporting systems. The resources will also help members meet their commitments under the IAW Pledge.

STEP 4: Full Membership

An Associate Member that has completed the IAW Self-Assessment will be asked to share the results of the assessment with its Board of Directors and senior management to decide on any additional measures that the organisation deems appropriate.

In addition, they will be invited to discuss the results of the assessment with the IAW team. The Self-Assessment review can be combined with policy advice and guidance on the organisation's procedures.

Thereafter, the Associate Member is entitled to full membership of IAW. Full members will be entitled to use the IAW mark on their materials and website and to reuse TI Ireland intellectual property on their website/intranet.

STEP 5: Dialogue

Ongoing dialogue, peer-to-peer learning and experience-sharing are core principles of the initiative.

The twice-yearly IAW Forums and annual conference will provide opportunities for stakeholders to network and discuss issues.

STEP 6: Review

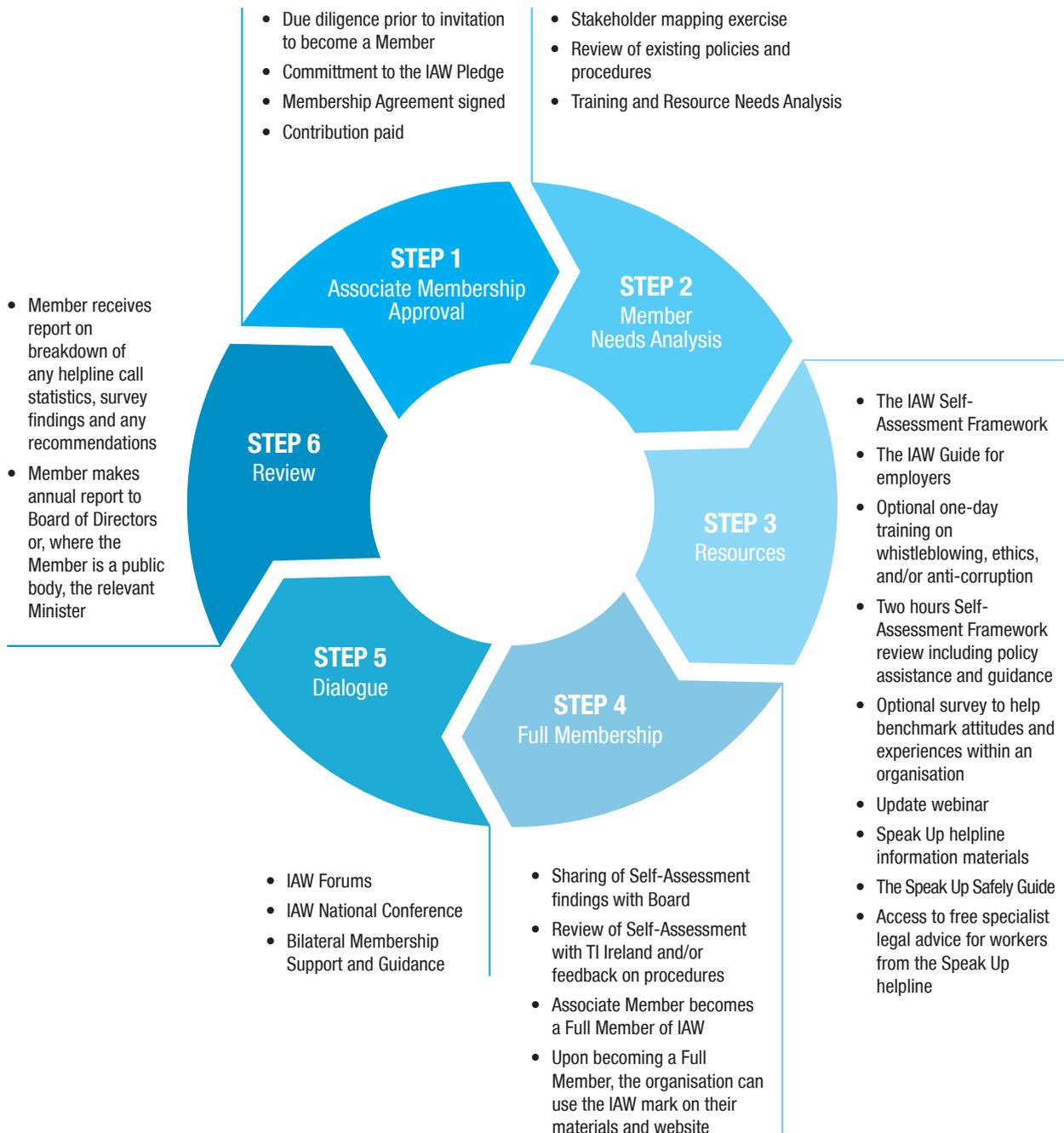
At the end of the Membership Cycle TI Ireland will provide the Member with a short report outlining activities undertaken during the year, an anonymised breakdown of statistics of calls to the Speak Up helpline, survey findings and any recommendations that have arisen from the member's Self-Assessment and/or with its staff over the course of the year. The Member will also receive an update webinar to cover relevant judgments and published codes or guidance.

The Member will be asked to present a short report on progress made towards meeting its commitments under relevant legislation and the IAW Pledge to its Board of Directors or, where the Member is a public body, the relevant Minister.

When a client of TLAC, who is also a worker of an IAW Member, is not satisfied with the response of their employer to a report that they have made, TLAC may inform them of the possibility of bringing this to the attention of TI Ireland. TI Ireland may then contact the IAW Member to make it aware of apparent systemic issues in investigating disclosures and protecting whistleblowers. This may involve highlighting particular cases with the employer. TI Ireland will help the Member determine what steps it might take to address any shortcomings.

Funding allocated to IAW (including IAW membership fees) will only be used to meet the operational costs of TLAC and the implementation of IAW.

The Membership Cycle for full members will be repeated from Step 2 (Member Needs Analysis) to Step 6 (Review) annually.



MEMBERSHIP PACKAGES

IAW offers three membership categories: Associate, Full and Foundation membership. An Associate Member is an organisation that has signed the IAW Pledge but has not yet undertaken the Self-

Assessment Framework. After undertaking the Self-Assessment the organisation becomes a Full Member.

Foundation members are recognised leaders of their sector who are engaged in the IAW Membership Cycle and receive the full range of services/benefits below plus sponsorship of the IAW Forums and annual conference. Only five Foundation memberships will be made available each year.

| ACTIVITY | ASSOCIATE MEMBER | FULL MEMBER | FOUNDATION MEMBER |
|--|------------------|-------------|-------------------|
| High level recognition on IAW materials and events | | | ✓ |
| Additional places at TI Ireland's National Integrity Awards | | | ✓ |
| Annual review of helpline statistics including number and type of calls | | ✓ | ✓ |
| Use of the IAW mark on internal and/or external information materials | | ✓ | ✓ |
| Access to specialist legal advice to workers via the Speak Up helpline | ✓ | ✓ | ✓ |
| Access to Transparency International's worldwide network of information and resources on ethics and anti-corruption | ✓ | ✓ | ✓ |
| Information materials for communicating IAW and the Speak Up helpline to workers | ✓ | ✓ | ✓ |
| Customised expert training on whistleblowing, anti-corruption, responsible lobbying and ethics | ✓ | ✓ | ✓ |
| The IAW Pledge: a unique opportunity to make a public commitment to an ethical workplace | ✓ | ✓ | ✓ |
| Places at IAW Forums and annual conference | ✓ | ✓ | ✓ |
| Quarterly newsletter on developments on whistleblowing, anti-corruption and ethics | ✓ | ✓ | ✓ |
| Update and Refresher Webinar at the end of each year of membership | ✓ | ✓ | ✓ |
| Exclusive access to resources including the IAW Guide and Self-Assessment Framework for existing policies and procedures | ✓ | ✓ | ✓ |
| Guidance on designing policies and procedures on whistleblowing, anti-corruption, responsible lobbying and ethics | ✓ | ✓ | ✓ |

MEMBERSHIP CONTRIBUTION

Organisations can also help support the participation of charities and other bodies that might not otherwise have the financial means to do so. A 15% discount for IAW members is offered on all additional services. All prices exclude VAT where payable.

A membership contribution reflecting the size and turnover of the participating organisation is requested for participation in IAW.

| INTEGRITY AT WORK MEMBERS PACKAGE | MICRO | SMALL | MEDIUM | LARGE |
|-------------------------------------|-----------|-----------|------------|------------|
| Number of staff | <10 staff | <50 staff | <250 staff | >250 staff |
| Helpline Promotion | ✓ | ✓ | ✓ | ✓ |
| Forum Membership | ✓ | ✓ | ✓ | ✓ |
| One Day Group Training | ✓ | ✓ | | |
| One Day In-House Training | | | ✓ | ✓ |
| Annual Review | | ✓ | ✓ | ✓ |
| Self-Assessment Framework and Guide | ✓ | ✓ | ✓ | ✓ |

THE INTEGRITY AT WORK PLEDGE

Members of IAW will be required to pledge that they will not penalise staff who make a report of wrongdoing and commit to implementing a set of policies and procedures on whistleblowing. The most senior staff member and a board member of the organisation will also be asked to sign the IAW Pledge on behalf of their organisation.

Text of Pledge

[Name of organisation] recognises the importance of developing an ethical workplace and the valuable contribution of those who raise concerns about wrongdoing. We commit to not penalising, or permitting penalisation against, a worker who reports risks or incidents of wrongdoing and to responding to or acting upon those concerns.

In committing ourselves to this pledge we will work towards implementing a whistleblowing/protected disclosures policy and accompanying procedures which:

- a. Promote the reporting of wrongdoing or the risk of harm to a responsible person inside the organisation or external bodies as appropriate.
- b. Provide comprehensive information about the types of disclosures that can be made, to whom, by whom and in respect of what.
- c. Encourage our workers to seek professional advice both prior and subsequent to making a report.
- d. Assure our workers that any report will be dealt with in the strictest confidence and that their identity or identifying information will not be disclosed to third parties unless required by law or necessary for the purposes of conducting an investigation.
- e. Provide our workers with sufficient notice and a timely explanation in the event that his or her identity is to be disclosed to a third party.
- f. Confirm that reports will be acted upon within a reasonable time frame and take whatever remedial action is deemed necessary by the organisation to address any wrongdoing or the risk of wrongdoing that might have been identified in response to the report.

- g. Commit to keeping any worker who makes a report informed of the progress of investigations.
- h. Provide for appropriate disciplinary action to be taken against anyone found to have penalised a worker for having reported wrongdoing or who has refused to engage in wrongdoing.
- i. Additionally, the organisation commits to record anonymised data each year on i) the number of reports made to the organisation, ii) the nature of each report, iii) the number of complaints of retaliation against workers who have made disclosures and iv) the action taken in response to each report.
- j. Share this data (as set out in paragraph i) with our Board of Directors (or other relevant governance body) or with the Minister of Public Expenditure and Reform (where appropriate).
- k. Ensure that our managers and responsible persons are aware of our commitments under this Pledge and related policies and procedures and are adequately trained in handling a report.
- l. Publicise our commitment to the Integrity at Work initiative with our workers and other relevant stakeholders.

Details of our protected disclosures policy and procedures can found on our website at [Insert organisation's website address]:

Signed (Chair)

Signed (Chief Executive)



Integrity at Work is a multi-stakeholder initiative of Transparency International Ireland promoting supportive working environments for anyone reporting concerns of wrongdoing.

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