



**MINISTRY OF FOREIGN AFFAIRS  
OF DENMARK**

# **CASE PROCESSING PROCEDURE – STEP BY STEP**

**THE MINISTRY OF FOREIGN AFFAIRS OF  
DENMARK'S WHISTLE-BLOWER MECHANISM**

# PREFACE

The Ministry of Foreign Affairs of Denmark (MFA) is an organisation with activities around the globe. The MFA is committed to **maintaining the highest standards of integrity and professional ethics**, and to ensuring the proper administration of public funds. The MFA wants to promote an open organisational culture where staff can safely report illegalities or serious irregularities. The whistle-blower mechanism will support this aim and contribute to promoting employees' freedom of speech.

The whistle-blower mechanism is to be seen as an **offer** and **an extra opportunity** to report significant issues.

The whistle-blower mechanism must be seen as a **supplement** to the direct and day-to-day communication in the workplace regarding errors and unsatisfactory conditions.

In a broader perspective, the whistle-blower mechanism will help to ensure that citizens **trust** that the MFA complies with the requirements of good public administration and proper conduct in the public sector.

# WHO CAN SUBMIT A WHISTLE-BLOWER REPORT?

All **employees** of the MFA (former, current and people who have not yet begun to work for the MFA, but who are reporting information acquired in connection with the hiring process).

In addition, employees of **partners**, including private companies and partners (e.g. **suppliers** and **contractors**) who have a more continuous or formalised cooperation with the MFA are also able to use the whistle-blower mechanism.

# WHAT IS THE WHISTLE-BLOWER MECHANISM? 1/2

The MFA whistle-blower mechanism provides a channel for **reporting**:

- **Criminal offences**, e.g. unauthorized disclosure of information about Danish foreign policy interests
- **Serious or repeated violations of the law**, e.g. abuse of entrusted power in violation of the MFA [anti-corruption policy](#).
- **Violation of administrative law principles or significant internal guidelines**, e.g. staff knowingly or repeatedly failing to provide sufficient information on cases and/or inadequately processing cases, or improperly accepting gifts in violation of the [MFA's gift policy](#).
- **Serious personal conflicts in the workplace**, e.g. severe harassment.
- **Sexual harassment**, i.e. unwanted verbal, non-verbal or physical behaviour of a sexual nature, for the purpose or with the effect of violating a person's dignity.
- **Deliberately misinforming citizens or partners.**

The mechanism is a supplement to the direct and day-to-day dialogue in the workplace regarding errors and unsatisfactory circumstances. Therefore, the first step MFA staff should take to resolve problems is to contact the immediate manager, HR, trade union representative, or the health and safety representative. If a partner of the MFA is experiencing problems with the MFA, the partner should first try to engage with their regular contact persons in the MFA to resolve the problems.

# WHAT IS THE WHISTLE-BLOWER MECHANISM? 2/2

The whistle-blower mechanism does not **cover** other issues. Examples include:

- **Violations of internal guidelines**, e.g. sickness absences, smoking, alcohol, attire, use of office supplies, etc.
- **Less serious personal conflicts**, e.g. general disagreements with management, disagreements regarding terms of employment, contract and pay conditions, holiday planning, staff PLUS interviews, working hours, etc.

The whistle-blower mechanism **must not be used to harass** colleagues, employees or management.

# DO I HAVE TO REVEAL MY IDENTITY?

The MFA encourages whistle-blowers **against submitting information anonymously**.

If you do not state your identity, we consider the report to be **anonymous**. However, we need contact information in order to communicate with you.

If you wish to maintain your anonymity, take care to ensure that you do not provide your name, telephone number or other personally identifiable information. When uploading files, including documents, videos, photos, etc, you may unintentionally provide information about your identity.

If we have received information about your identity, we may be required in some cases to disclose this information to others. For example, if your report is about a specific individual and that person has a right to the information under the data protection regulations.

In **exceptional cases**, the MFA may be required to collect and transfer information about the whistle-blower if this is done in an effort to avert offences that may pose a threat to national security or human life or well-being.

In accordance with the rules of the Danish Access to Public Administrative Files Act, it is possible to apply for access to documents in a whistle-blower case.

# HOW REPORTS ARE PROCESSED

If you wish to submit a report through the whistleblower mechanism, you must use the online form at <https://um.dk/en/about-us/organisation/whistleblower>.

If the matter your report relates to is not covered by the mechanism, we cannot process it and we will therefore reject it. If we have your contact information, we will notify you in case of such rejection.

If your report is covered by the mechanism and we assess that it is possible to adequately investigate the matter, an investigation will be conducted.

Your report will be initially processed and assessed in the Controller Department. If the report requires further investigation, Controller will typically involve the office in the MFA that is responsible for the area in question.

The information will be sent to a specially appointed Whistleblower Coordinator at this office. We emphasise that the information will be treated confidentially and that the office must take extra care to protect your identity.

The investigation will be conducted in accordance with joint MFA case processing guidelines on whistle-blower reports and the established standard practices of the office in question.

Once the case is investigated and closed, we will notify you if you provided contact information.

# WHAT HAPPENS ONCE THE INVESTIGATION IS COMPLETED

If the investigation of your report leads to the identification of impermissible circumstances, illegalities or serious irregularities, a number of **responses** are possible. For example, the MFA may:

- Express its view on the case to the relevant unit or employee(s), including criticism, recommendations and/or orders
- Implement changes to internal guidelines or the like
- Initiate a personnel case (e.g. disciplinary or dismissal case) against the relevant involved employees
- Handover the case to the police or other relevant public authority for investigation of possible criminal offences
- Effectuate contractual consequences in cases where the matter involves serious errors or neglect committed by a partner

# YOUR RIGHTS AS A WHISTLE-BLOWER OR THE SUBJECT OF A WHISTLE-BLOWER REPORT

In principle, a whistle-blower does not have more rights than other individuals.

Both the whistle-blower and the person who is the subject of the report are generally covered by the data protection rules, i.e. they have a right to request the correction, deletion or limited processing of the data that the MFA possesses about the person.

The whistle-blower and the person who is the subject of the report both have a right of access to information about what data is being processed, the purpose of the processing, and a copy of the data.

If the case concludes with the issuance of a ruling based on administrative law, the standard rules and provisions of the Danish Public Administration Act will apply, e.g. justification, consultative procedure and guide to appeals of the ruling.

If the information received give rise to suspicion of a criminal offence, the provisions of the Danish Administration of Justice Act must be observed.

# OTHER IMPORTANT INFORMATION

Any person can contact Controller if they have suffered negative consequences because they submitted information to the whistle-blower mechanism.

False or misleading information may not be intentionally submitted through the whistle-blower mechanism. Information submitted in bad faith may be reported to the police and may have negative employment consequences or result in contractual consequences for the person, who submitted the information.