



**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** among staff in every area of operation, and to ensuring the proper administration of public funds. The Ministry of Foreign Affairs of Denmark 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 promote employees' freedom of speech and right to report.

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, etc. between colleagues and managers, as well as the general rules of participation and cooperation.

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 MFA **employees** (former and current, as well as persons who have not yet begun to work for the MFA but are reporting on information acquired in connection with the hiring process) and employees of **partners**, including private companies (e.g. **suppliers and contractors**, who have a more continuous or formalised cooperation with the MFA), are able to use the whistle-blower mechanism without revealing their identity and without risking any negative consequences for example with regard to their terms of employment.

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 gift policy](#).
- **Serious personal conflicts in the workplace**, e.g. sexual harassment and other forms of severe harassment.
- **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 partners of the MFA is experiencing problems with the MFA, the partners 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 problems or issues. This includes for example:

- **Violations of minor internal personnel 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?

As far as possible, the MFA advises 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. This could for example be instances, where you have submitted information about a specific individual and that person under the data protection regulations has a right to the information.

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.

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 unit. If the report requires further investigation, the Controller unit will typically involve the office in the Ministry of Foreign Affairs of Denmark that is responsible for the area in question.

The information will be sent to a specially appointed Whistle-blower 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.

FOLLOWING UP ON THE REPORTED CASE

If the investigation of your report reveals improprieties, crimes or serious irregularities, etc, the MFA may take one or more of the following **actions**:

- 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.

The Controller unit will in dialogue with the unit, which might investigate the case, assess to what extent the whistle-blower should be involved in the processing of the case; when the subject of the report is to be notified; and the extent to which the subject of the report is to be involved in the processing of the case.

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.

The whistle-blower mechanism and the information submitted via the mechanism are generally covered by the rules on data protection. This means that rights in relation to data protection generally apply for both the whistle-blower and the subject(s) of the report.

OTHER IMPORTANT INFORMATION

Any person can contact Controller if they have suffered negative consequences or retaliation 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.