



## 29. Ensure proper handling of incident reports

### Challenge

An important reason why employees do not report incidents is because they have no confidence that anything will be done with the report. When incidents, if they are known, are not investigated and addressed, it is a negative signal to reporters. For a co-worker, it is not digestible that a manager or colleague 'gets away' with perceived undesirable behaviour. It gives a sense of unfairness. Always handling incidents in a timely and careful manner and communicating about them (periodically) radiates soundness and fairness.

Suppose there may have been a suspicion of theft of assets. An internal fact-finding investigation should always be started. This shows that the situation is taken serious. It does not always have to be given immediate organization-wide publicity but if it turns out that theft has indeed taken place and the investigation has been completed, it is advisable to inform the entire organization.

### Solution

Make sure that reports are registered at a central point (see also speak up procedure). Let management and employees know that reports are always followed up on.

Regularly inform the reporter and other parties involved about the progress of the investigation. For example, at least once a month. Even if there is nothing to report yet; it shows that the investigation is still ongoing. During the investigation, make sure that the person who is being investigated is treated carefully, e.g. by means of sufficient adversarial hearings. You must avoid damaging someone at all times.

Inform the reporter about the outcome of the investigation. Depending on the nature of the case, more or less information may be given. The reporting person should at least be informed that the report has been investigated, whether or not evidence has been found and whether or not measures have been taken. It is sometimes possible to give more details to the reporter, but not all cases lend themselves to this.

The reporter can be given a certain period of time to respond. For example, a period of 2-6 weeks. The reporter can substantiate their statement with additional information or with previously unsubmitted documentation. This may be a reason to reopen the investigation. At a certain point, the case will be definitively closed.



Make an aggregated report and analysis with regard to all reports for management, the Supervisory Board and for all employees. It is important that trends and signals are followed up. This report can be included in the social annual report and in the compliance report to the Works Council (OR).

Anonymised cases are communicated to the organization, explaining how this has been resolved and what measures have been taken to prevent recurrence. This is certainly not possible in every case, but often a selection can be made. If necessary, a whistleblower can receive public recognition for reporting an abuse or possibly receive a reward for it.

This tool should be read in conjunction with tool 27. "Provide a speak up procedure".

### **Actors**

The compliance professional has a responsibility for investigating the incident or having it investigated. The compliance professional tests for subsidiarity and proportionality and sometimes coordinates in the event of larger incidents.

### **Techniques**

Set up and manage an incident register. Use examples from this anonymously as example material for training courses and workshops.

### **Role Compliance Professional**

The compliance professional ensures that the investigation is initiated and follows this. They ensure there is clarity and the facts are established. They assist to form the opinion and to discuss the incident with those involved. Depending on the agreed task, they report to management and assist with communication to the organization and management.