Procedure for reporting to the whistleblower scheme for employees at Nørre Gymnasium

This is Nørre Gymnasium's procedure for how to make a report to the school's whistleblower unit. The procedure has been made publicly available on Nørre Gymnasium's website.

Among other things, the whistleblower scheme is intended to improve the opportunities for employees at Nørre Gymnasium to point out and speak up about critical matters without having to fear negative consequences.

What rights do you have as a whistleblower
Nørre Gymnasium ensures that your identity and the information you report are treated confidentially. The whistleblower unit is subject to a very strict duty of confidentiality.

If you report to the whistleblower scheme, you are protected against negative consequences connected with a report made in good faith. A report is made in good faith when you had reasonable grounds to believe that the reported information was correct at the time of reporting and that the information was covered by the whistleblower scheme.

If you submit a report in bad faith, it may have negative consequences for you, and in special cases there may be grounds for reporting the matter to the police.

If, as an employee, you experience consequences for your employment because you have used the whistleblower scheme, we encourage you to contact the whistleblower unit, your union representative or your trade union.

What rights do persons affected by your report have
Nørre Gymnasium ensures that the identity of the person or persons your report concerns is protected in connection with the whistleblower unit's handling of the case, and that the person has access to an effective defence, including by registering the report.

Which breaches can be reported in the whistleblower scheme
Nørre Gymnasium's whistleblower scheme makes it possible to confidentially submit information about serious breaches of the law, other serious matters etc. to an impartial whistleblower unit, which can investigate the matters further.

Reports must be made in good faith and may, for example, concern:

- criminal offences, e.g. breach of the duty of confidentiality, misuse of funds, theft, deception, embezzlement, fraud, bribery etc.,
- serious or repeated breaches of legislation, e.g. legislation on the use of force, the Danish Public Administration Act, data protection legislation, the Danish Access to Public Administration Files Act etc.,

- serious or repeated breaches of principles of administrative law, e.g. the duty to investigate, requirements of objectivity and proportionality etc.,
- serious or repeated breaches of significant internal guidelines, e.g. on business travel, gifts and financial reporting etc.,
- serious person-related conflicts in the workplace, e.g. serious harassment, including of a sexual nature, and
- deliberate misleading of citizens and partners.

As a starting point, the scheme does **not** cover reports concerning other matters, e.g.:

- HR matters,
- information about less significant breaches of internal guidelines, e.g. on sickness absence, smoking, alcohol, dress, use of office supplies etc., and
- information about less serious personnel-related conflicts in the workplace, e.g. difficulties in cooperating, minor disagreements and lack of trust between employees and managers.

Incorrect or misleading information must not be knowingly submitted through the whistleblower scheme. Reports submitted through the whistleblower scheme in bad faith may lead to a police report and may also lead to negative consequences for your employment.

Who can report to the whistleblower scheme
The scheme can be used by all employees at Nørre Gymnasium.

The whistleblower scheme may be relevant to use if, for example, you have become aware of illegal or criminal matters such as theft, deception, embezzlement, fraud, bribery or the like, or a breach of the duty of confidentiality, and you also feel that you have no one to pass your knowledge on to, or you wish to pass on the information confidentially. It may also, for example, be cases concerning serious or repeated breaches of legislation such as the Danish Public Administration Act or the Danish Access to Public Administration Files Act, or serious person-related conflicts in the workplace such as sexual harassment, or deliberate misleading of citizens and partners.

The whistleblower scheme is a supplement to the ordinary existing options. You can always go to the Principal, your immediate manager, the HR administration or the union representative if you experience criminal or other critical, serious matters at Nørre Gymnasium.

It may therefore be relevant to try the following first if you have a concern or experience critical matters at the school:

- Have you talked to your immediate manager about your concern?
- Have you talked to the Principal?
- Have you talked to the health and safety representative?
- Have you talked to the union representative?

How do you make a report
You can submit a report via the following link:
https://whistleblowersoftware.com/secure/94f7fe96-bc3b-496f-b345-38af3fd769eb

Nørre Gymnasium recommends that you use this solution in order to protect confidentiality, your personal information etc.

The school encourages you to use the school's internal scheme, but must also make you aware that you can make your report to the Danish Data Protection Agency's external and independent whistleblower scheme via the following link: https://whistleblower.dk

Nørre Gymnasium must also make you aware that your use of the scheme does not limit your freedom of expression as a public employee.

How is your report handled and registered

Your report to the whistleblower scheme is made through an IT system that automatically sends an email to the whistleblower unit, which consists of a Head of Education and the health and safety representative at Nørre Gymnasium as well as the school's affiliated legal advisers at Gymnasiefællesskabet. You will receive an acknowledgement of receipt of your report within 7 days, and at the same time you will be told the expected processing time.

The whistleblower unit screens the case and then discusses it in cooperation with the selected employee(s) at the school.

When the unit has received your report, it first assesses whether there are grounds for actually processing the case, i.e. whether or not your report falls within the scheme. You will be informed about the handling of the case and, where relevant, its outcome. In certain cases, however, the information may be limited by the rules on the duty of confidentiality etc.

The unit will keep you informed on an ongoing basis about the handling of your report. If more information is needed, clarifying questions will be sent to you through the IT system.

If your report falls outside the scope of the scheme, it will be rejected. In that case, the whistleblower unit will advise you on where you may direct your enquiry.

The whistleblower unit reports to the Principal, who decides on the further course of action. If a report concerns the Principal, the report is also handed over to the Chair of the Board.

If there are grounds for further investigations and for assessing possible disciplinary sanctions or even a police report, the Principal is also informed with a view to handling the case.

As a starting point, both the whistleblower and the person reported will receive a notification when the case has been closed.

Questions

If you have questions about Nørre Gymnasium's whistleblower scheme, you can direct them to Principal Mette Vedel at mv@nrgym.dk.

Read more

Please refer to Nørre Gymnasium's guidelines for the whistleblower unit's handling of reports and to Nørre Gymnasium's whistleblower policy and privacy policy.