





EUROPEAN COMMISSION

DIRECTORATE-GENERAL

HUMAN RESOURCES AND SECURITY

Directorate HR.IDOC – Investigation and Disciplinary Office

The Director

Brussels, 06. 12. 2011  
HR.IDOC.1/RS/nc – Ares (2011)

*Investigations and disciplinary matters\**

Dear Ms James,

Thank you for your letter of 18 November 2011.

I can confirm that we have prepared a draft policy document on whistleblowing. This document is currently the subject of internal discussions and our intention is to have it formally approved and communicated to all staff in the early months of next year. In preparing this document, we have paid close attention on the findings and the recommendations of the whistleblowing study carried out by PriceWaterhouseCoopers, as well as on EU case law and existing policies in other international organisations.

The document addresses the majority of the recommendations made in the study, although some recommendations will be addressed in other ways: for instance, arrangements have been made with the Anti-Fraud Office (OLAF) to ensure that detailed statistics are kept in future, and the second recommendation, to demonstrate that the system works, will be followed through other publications, in particular in the annual activities reports of both OLAF and IDOC, rather than in the policy document itself.

The draft policy document highlights that any form of retaliation against bona fide whistleblowers will not be tolerated and explains the various protection mechanisms in place, which includes an explicit commitment to keep the identity of the whistleblower confidential. Crucially, it also provides for a confidential guidance and support function for members of staff who are unsure whether the information that they discover qualifies as whistleblowing; this service will also provide advice on where to go if this is not the case.

Ms Cathy James  
Public Concern at Work  
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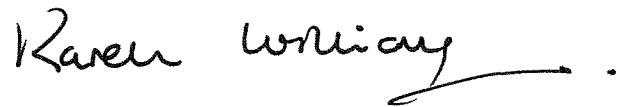
\* This document and all related documents must be kept under lock and key and may not be divulged to any person other than those who are required to see them for the purposes of the procedure. These documents must be sent in a double envelope, by messenger or ARES sent directly to the person concerned.

We are of course aware of the excellent reputation that Public Concern at Work enjoys, both in the UK and internationally, and we appreciate it that your organisation is willing to offer its services in running an advice line. However, like most public services, the EU institutions are currently subjected to severe financial constraints and are faced with cuts in both human and financial resources, so our intention is to provide this service within the Commission.

We are quite aware that this intention does not fully correspond to the sixth recommendation made in the study, but given the size of our organisation, we believe that such a service will be able to offer the necessary guarantees of confidentiality and impartiality in order for it to be taken seriously by staff.

Once the new policy proposals are formally approved, I will be happy to provide you with a copy and would of course be grateful for any comments that you may wish to make on them.

Yours sincerely,

A handwritten signature in black ink, reading "Karen Williams" with a long, sweeping underline.

Karen WILLIAMS

Cc: Jean-Luc Feugier - HR/01