

### Objective

The objective of the Danish Cancer Society's whistleblower system is to increase the possibilities that as

- an employee of the Danish Cancer Society
- a volunteer in the Danish Cancer Society, including in our Executive Committee and other representative bodies
- a supplier to the Danish Cancer Society – or an employee of one of our suppliers
- a partner of the Danish Cancer Society – or an employee of one of our partners
- a paid or unpaid trainee in the Danish Cancer Society
- an attached MSc student, bachelor student or visiting researcher
- a former employee
- a job applicant

you can tell about unacceptable conditions in the Danish Cancer Society without having to fear negative consequences.

The objective of the Danish Cancer Society's whistleblower system is thus to ensure openness and transparency in relation to any serious offences and other serious matters.

If you know about such conditions in the Danish Cancer Society, we would very much like to hear from you, so that we can rectify the matters and avoid any negative impact on the Danish Cancer Society and our reputation.

We in the Danish Cancer Society have direct and daily communication about errors and unsatisfactory conditions, etc., where you involve your own manager or your volunteer leader if you are an employee or a volunteer or attached to us as a trainee, student or visiting researcher. According to the circumstances, you can also involve your manager's manager, your trade union representative, the work environment representative, HR & Organisational Development, the Cancer Research Center's Committee for Good Scientific Practice (also known as Practice Committee), the Danish Cancer Society's data protection officer (DPO) or the Danish Cancer Society's managing director. You should see the Danish Cancer Society's whistleblower system as a supplement to this direct and daily communication.

This also applies to you who are a supplier, partner, former employee or job applicant – you are welcome to contact one of our managers, HR & Organisational Development, the Cancer Research Center's Committee for Good Scientific Practice (also known as Practice Committee), the Danish Cancer Society's data protection officer (DPO) or the Danish Cancer Society's managing director if you experience errors or unsatisfactory conditions that you would like to tell us about.

You also have the possibility of using the Danish Cancer Society's whistleblower system if you do not belong to one of the above groups of persons. Other citizens in Denmark, for example members of the Danish Cancer Society, are welcome to use the whistleblower system. However, other citizens in Denmark are not covered by the Danish Act on the Protection of Whistleblowers when reporting information falling within the scope of the Act and the Danish Cancer Society's whistleblower system.

### **Our values**

The Danish Cancer Society's whistleblower system is based on our values, which you can find [here](#). If you tell us about serious offences and other serious matters in the Society, we will

- Listen attentively to become wiser
- Want to be in a dialogue with you
- Give you the possibility of being anonymous if it is important to you

### **Use the Danish Cancer Society's whistleblower system**

The Danish Cancer Society encourages you to use the Danish Cancer Society's whistleblower system so that we can counter any serious offences and other serious matters in the Society swiftly and efficiently in-house. However, you also have the possibility of reporting to the external whistleblower channel (the Danish Data Protection Agency [www.whistleblower.dk](http://www.whistleblower.dk)) instead.

### **The Danish Cancer Society's whistleblower unit**

Reports to the Danish Cancer Society's whistleblower system are considered by the Danish Cancer Society's whistleblower unit, which is embedded in the Danish Cancer Society's HR & Organisational Development department and made up of the head of HR & Organisational Development and the vice-chairman of the Danish Cancer Society's central committee.

The Danish Cancer Society's whistleblower unit is impartial and takes an objective and professional view when considering your report, regardless of which persons in the association your report may concern. Participants in the whistleblower unit's work will be substituted with a view to taking into account possible conflicts of interest in relation to a specific report.

Questions about individual reports and about the Danish Cancer Society's whistleblower system can be addressed to [whistleblowerordning@cancer.dk](mailto:whistleblowerordning@cancer.dk).



The Danish Cancer Society's whistleblower unit may involve external parties, for example an attorney or an accountant, in the consideration of a report if the contents and nature of the report so require.

Below, you can see how you report to the Danish Cancer Society's whistleblower system and what you can report. When you report to our whistleblower system, we process your personal data. You can find our privacy policy for whistleblowers [here](#).

### **What can you report?**

You can use the Danish Cancer Society's whistleblower system to report information about breaches of EU law falling within the scope of the Whistleblower Directive.

Moreover, you can report information about serious offences and other serious matters in the Society that cannot necessarily be attributed to a specific offence as well as about the parts of EU law not falling within the scope of the Whistleblower Directive. You can report information about matters that have taken place or will take place in the Danish Cancer Society.

An offence and other matters in the Danish Cancer Society will generally be serious if it is in the public interest that it is brought to light. Offences of a trivial nature are not covered.

If you are employed by the Danish Cancer Society, reports on your own employment relationship are generally not covered except for instances of sexual harassment or severe harassment. Similarly, if you are a volunteer in the Danish Cancer Society or attached to us as a trainee, student or visiting researcher, reports on your own attachment are generally not covered except for instances of sexual harassment or severe harassment.

Information about other matters, including information about minor breaches of internal guidelines, e.g. about sickness absence or information about other personal conflicts in the workplace, will generally not be considered serious breaches, and consequently you should not report them to the Danish Cancer Society's whistleblower system.

You can tell your manager about such matters if you are an employee or attached to us as a trainee, student or visiting researcher or to your volunteer leader if you are a volunteer in the Danish Cancer Society. According to the circumstances, you can also involve your manager's manager, your trade union representative, the work environment representative, HR & Organisational Development, the Cancer Research Center's Committee for Good Scientific Practice (also known as Practice Committee), the Danish Cancer Society's data protection officer (DPO) or the Danish Cancer Society's managing director.

This also applies to you who are a supplier, partner, former employee or job applicant – you are welcome to contact one of our managers, HR & Organizational Development, the Cancer Research Center's Committee for Good Scientific Practice (also known as Practice Committee), the Danish Cancer Society's data protection officer (DPO) or the Danish Cancer Society's



managing director if you experience matters in our organisation of a less serious nature that you would like to tell us about.

In all circumstances, we assume that you are in good faith that the information you report is correct.

In *Annex 1* to these guidelines, you can find examples of information about serious offences and other serious matters as well as examples of information not covered by the whistleblower system.

### **How to report offences**

You can report in writing or orally to the Danish Cancer Society's whistleblower system.

You report in writing via the link at the Danish Cancer Society's website [www.cancer.dk](http://www.cancer.dk) 'Whistleblower system', which will lead you to the webpage 'Whistleblower system'. There you will find a link that opens an email addressed to [whistleblowerordning@cancer.dk](mailto:whistleblowerordning@cancer.dk). The Danish Cancer Society can write to you from an encrypted secure email connection. In this connection, you should be aware of the security of your own email connection.

If you want to report in writing and anonymously, you must send a letter to the Danish Cancer Society, Strandboulevarden 49, DK-2100 Copenhagen Ø, marked 'Whistleblower system'.

You report orally by calling +45 53 19 08 55, where you can leave your name and your contact details as well as your report on an answering machine. When you choose this form of reporting, you also consent to us recording your report on the answering machine.

You can choose to report anonymously to the answering machine if you want to. In that case, you must be aware to hide the telephone number you are calling from and not state your name or contact details. When you choose this form of reporting, you also consent to us recording your report on the answering machine.

If you choose to be anonymous, you must be aware that we cannot be in dialogue with you, and that consequently it may be more difficult for us to investigate your report.

### **Can you use the Danish Cancer Society's whistleblower system?**

The following groups of persons can use the Danish Cancer Society's whistleblower system:

- Employees of the Danish Cancer Society
- Volunteers in the Danish Cancer Society, including in our Executive Committee and other representative bodies
- Suppliers to the Danish Cancer Society and employees of our suppliers
- Partners of the Danish Cancer Society and employees of our partners
- Paid or unpaid trainees in the Danish Cancer Society



- Attached MSc students, bachelor students and visiting researchers
- Former employees
- Job applicants

Other citizens in Denmark, for example members of the Danish Cancer Society, can also use the Danish Cancer Society's whistleblower system. However, other citizens in Denmark are not covered by the Danish Act on the Protection of Whistleblowers when reporting information falling within the scope of the Act.

### **Consideration of your report**

The Danish Cancer Society's whistleblower unit will acknowledge receipt of your report within seven days of having received the report. You will receive an email from the Danish Cancer Society's whistleblower unit.

If you choose to report anonymously – in writing or orally – we will naturally not be able to acknowledge receipt of your report.

Our whistleblower unit will then carefully follow up on your report. How we follow up will depend on the contents and nature of your report.

Initially, the whistleblower unit will consider whether your report falls within the scope of the whistleblower system. If your report falls outside the scope of the whistleblower system, the whistleblower unit will reject your report. The whistleblower unit will of course inform you about this. At the same time, the whistleblower unit will as far as possible inform you whom to contact instead.

If your report falls within the scope of the whistleblower system, the whistleblower unit will consider the report. This means, among other things, that, depending on the contents and nature of your report, the Danish Cancer Society's whistleblower unit will obtain additional information internally in the Danish Cancer Society. The consideration may also involve further dialogue with you.

### **Feedback to you**

The Danish Cancer Society's whistleblower unit will give you feedback on your report within three months from the date when the whistleblower unit acknowledged receipt of your report.

Feedback means that, depending on the contents and nature of your report, the whistleblower unit will tell you what initiatives the Danish Cancer Society will take or contemplates taking, and why the Danish Cancer Society has chosen this follow-up.

Follow-up may for example be



- Implementing an internal investigation in the Danish Cancer Society
- Briefing by the Danish Cancer Society's managing director or Executive Committee
- Reporting to the police or relevant supervisory authority
- Closing the case due to lack of or insufficient evidence.

If the Danish Cancer Society's whistleblower unit is unable to give you feedback within the time limit mentioned, the whistleblower unit will inform you to this effect, and about whether you can expect to receive further feedback. This may, for example, be the case if an internal investigation has been launched, which cannot be completed within the time limit.

The Danish Cancer Society's whistleblower unit must comply with current legislation, including data protection legislation. This means that we must have a lawful basis in order to disclose personal data to you. We will make a specific assessment of the personal data we will disclose to you, when we give you feedback or inform you about the follow-up to your report.

### **Duty of confidentiality and processing of information**

Employees attached to the Danish Cancer Society's whistleblower unit have a special duty of confidentiality in relation to the information that forms part of your report.

The duty of confidentiality applies only to information that forms part of your report. If your report causes the whistleblower unit to start a case, other information gathered in that connection will not be covered by the duty of confidentiality.

The Danish Cancer Society's whistleblower unit will to the widest extent possible treat your report as confidential. We process the information from your report in accordance with the rules governing processing in the Whistleblower Protection Act and in the data protection legislation.

We may disclose information from your report to others, e.g. if it is necessary to follow up on your report. We will inform you prior to any disclosure of information about who you are (your identity) unless it will jeopardize a related investigation or legal action. This may for instance be the case if such notification is specifically assessed to involve a risk that evidence will be hidden or destroyed; that witnesses will be influenced; or if there is suspicion that the whistleblower has intentionally given false information.

According to section 22 of the Whistleblower Protection Act, the Danish Cancer Society's whistleblower unit may process sensitive information and information about criminal offences if it is necessary to consider a report received under the Danish Cancer Society's whistleblower system.

### **Protection of you as a whistleblower**

As a whistleblower, you will not be subject to retaliation, including threats of or attempts of retaliation, because you have made a report to the Danish Cancer Society's whistleblower unit



or the external whistleblower channel in the Danish Data Protection Agency. You must not be prevented from nor must attempts be made to prevent you from making reports.

Retaliation against whistleblowers means all forms of adverse treatment or adverse consequences as a reaction to an internal or external report that cause or may cause you harm.

As a whistleblower, you cannot become liable for having reported confidential information if you are in good faith that the information in your report is necessary to reveal a serious offence or a serious matter in the Danish Cancer Society.

Attempts by the Danish Cancer Society's employees or management to prevent you as a whistleblower from making a report or to retaliate against a whistleblower who has made a report in good faith will have employment law consequences for the persons concerned.

### **Affected persons**

An affected person can be both the person whom the whistleblower's report concerns and a natural or legal person connected with such person (e.g. a spouse). There may be several affected persons in a report.

If you are an affected person in relation to a report to the Danish Cancer Society's internal whistleblower system, the Danish Cancer Society will safeguard your rights, including that

- Your identity is protected in connection with the consideration of the case
- You have access to an effective defence
- You know your rights under the data protection legislation

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### **Additional information**

The Danish Ministry of Justice has prepared a guidance for persons who want to submit or are considering to submit information as whistleblowers. The guidance provides a general description of the Whistleblower Protection Act, including descriptions of whistleblower channels and reporting possibilities, whistleblowers' rights and the protection of whistleblowers. The guidance can be obtained (in Danish) at the Ministry of Justice's website [here](#).



## Appendix 1

### Examples of serious offences

Criminal offences, which will generally fall within the scope of the Act on the Protection of Whistleblowers:

- Bribery
- Forgery
- Hacking, tapping, recording of conversations between others, etc.
- Theft
- Embezzlement
- Fraud
- Computer fraud
- Criminal breach of trust
- Extortion

Breaches of special legislation or other legislation, which will generally fall within the scope of the Act on the Protection of Whistleblowers:

- Breaches of tax law
- Neglect of duties of confidentiality
- Breaches of the Danish Bookkeeping Act
- Breaches of the Danish Road Haulage Act
- Breaches of the Danish Aviation Act
- Neglect of a statutory duty to act
- Breaches of rules of engagement
- Intentional deception of citizens and partners

### Harassment

- Sexual harassment, cf. the Danish Equal Opportunities Act
- Severe harassment, e.g. because of race, gender, colour, national or social origin, or political or religious affiliation

### Examples of serious matters

Matters generally considered as serious:

- Disregard of professional standards, which may for instance involve a risk for the health and safety of persons
- Severe or repeated breaches of the internal guidelines of a workplace on, for example, business travel, gifts or financial reporting (but cf. further details below on trivial breaches)



- Serious errors and serious irregularities connected with IT operation or IT systems management
- Special cases, where minor collegial difficulties involve large risks and thus constitute a serious matter

#### **Examples of information not falling within the scope of the Act**

- Information of a trivial nature, information about other matters, including information about breaches of internal guidelines on sickness absence, smoking, dress code or ancillary provisions such as non-performance of the duty to provide documentation
- Information about the whistleblower's own employment, including conflicts between employees, collegial difficulties or matters falling within the scope of the industrial system, except for incidents of sexual harassment or another form of severe harassment

