



United Nations
Office on Drugs and Crime

Model Speak Up Policy

Model Flow Chart and Processes

Approved by the Board of Directors or any
other relevant body
XX/XX/202X

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This document was produced in a collaborative manner with representatives from the private sector and civil society, under the UNODC project "[Strengthening the Integrity and Anti-Corruption Efforts of the Private Sector in Myanmar](#)". It is intended to serve as a model that companies may tailor to their specific contexts and needs. It is designed to be a living document that users are encouraged to review and adapt over time.

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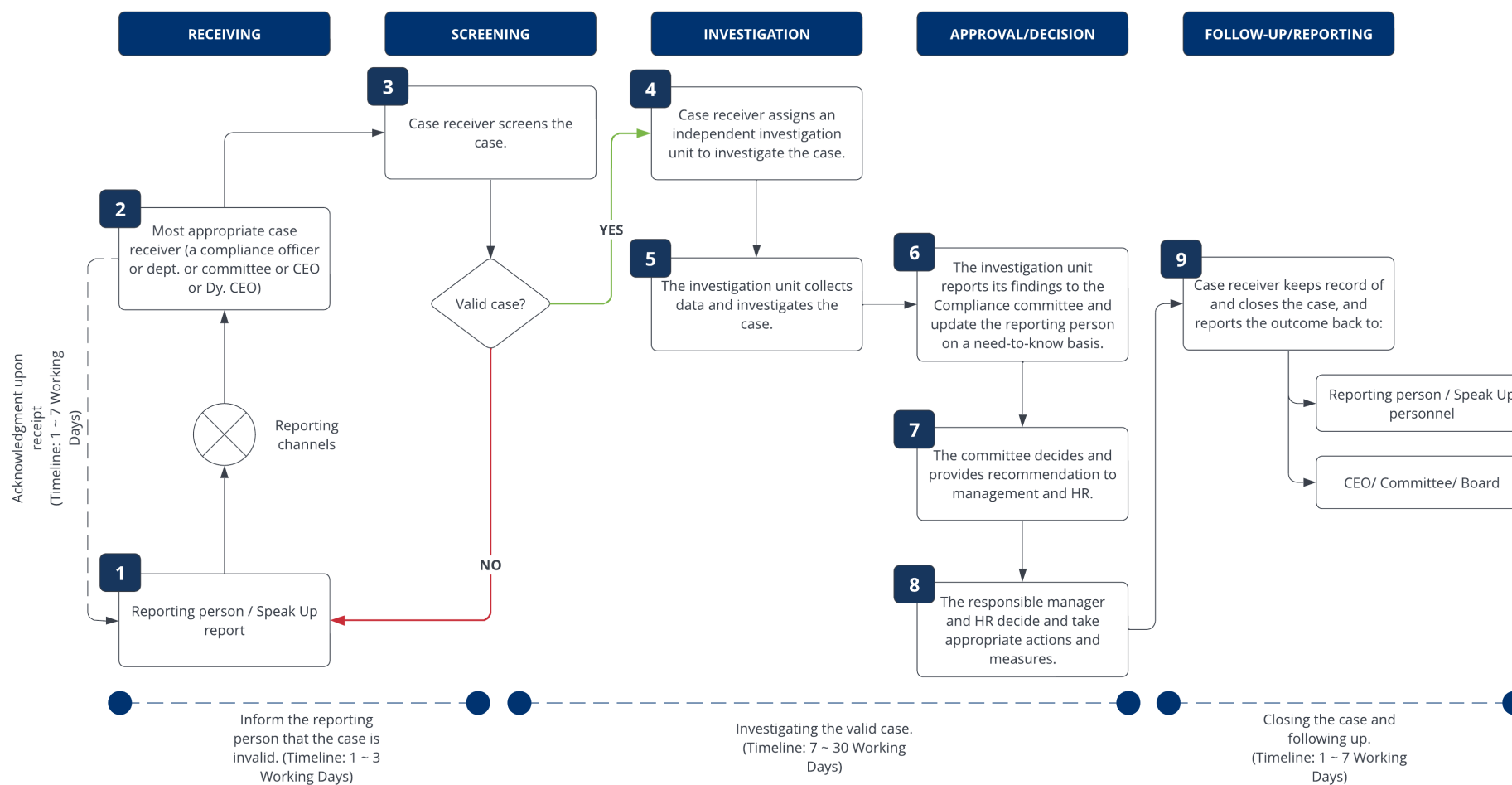
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| How to read and tailor this document | |
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| XXX | Baseline |
| XXX | Parameters to be changed |
| XXX | Suggestions to consider |

Speak Up Mechanism – Flowchart and processes

BIM Model - Speak Up (Internal reporting) mechanism





| # | Steps | Actions | Person in charge | Control mechanism | Timeline |
|---|---|---|--|-------------------|---|
| 1 | The reporting person makes a Speak Up report | <ul style="list-style-type: none"> Stakeholders covered by the Speak Up Policy may report wrongdoings or misconduct according to the criteria set in the Speak Up Policy. The reporting template provided in the annex section of the Speak Up Policy should be used. Stakeholders seeking guidance regarding ethical dilemmas can reach out to their [line managers] or [Compliance Officer] through different reporting channels. Confidentiality should be ensured throughout the whole process. | | | The appropriate personnel sends a notification of receipt within [1 to 7] working days. |
| 2 | The most appropriate personnel/department receives the case | <ul style="list-style-type: none"> The appropriate personnel receives the report from the reporting person. The appropriate personnel provides guidance to the stakeholder who needs it. If they cannot provide guidance, they may refer to an expert, such as the [Compliance Officer] or the [Compliance Team]. | <ul style="list-style-type: none"> Compliance Officer Compliance Team Line manager Chairperson of the Board Deputy Chairperson of the Board | | |



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| 3 | The case receiver screens the case | <ul style="list-style-type: none">The appropriate personnel screens the report and determines if it is admissible as a Speak Up report. | <ul style="list-style-type: none">Compliance OfficerCompliance TeamCompliance CommitteeLine managerChairperson of the BoardDeputy Chairperson of the Board | If "Yes", the appropriate personnel reports to the [Compliance Committee] that the report needs an investigation and moves to step 4. If "No", the appropriate personnel informs the reporting person that the report is not valid and of the reasons thereof. | The appropriate personnel informs the reporting person that the report is not valid within [1 to 3] working days. |
| 4 | The case receiver assigns an investigation unit to investigate the case | <ul style="list-style-type: none">The appropriate personnel or the [Compliance Team] assigns an independent investigation unit in charge of investigating the report.The investigation unit must possess the necessary expertise in dealing with such situations, conduct the investigation confidentially, objectively, unbiased, and fairly and ensure that none of its members suffers from an actual or potential conflict of interest, in which case the member(s) should be replaced immediately and before the beginning of the investigation. | <ul style="list-style-type: none">Compliance TeamIndependent investigation unit | | The investigation process – from investigating the case to taking appropriate actions and measures - takes [7 to 30] working days. |



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| 5 | The investigation unit collects data and investigates the case | <ul style="list-style-type: none"> Through data collection, such as interviews, engagements and desk research, the investigation unit collects as much information as possible to conduct an effective investigation. | <ul style="list-style-type: none"> Compliance Team Independent investigation unit | | |
| 6 | The investigation unit reports its finding to the committee and updates the reporting person on the case | <ul style="list-style-type: none"> The investigation unit prepares a findings report and submits it to the [Compliance Committee]. The investigation unit reports to the case receiver which updates the reporting person only on a need-to-know basis. | <ul style="list-style-type: none"> Compliance Team Independent investigation unit | | |
| 7 | The committee decides and provides a recommendation to [management and HR] | <ul style="list-style-type: none"> Based on the report, the committee makes a decision and provides recommendations to [management and HR] on how they should proceed. | <ul style="list-style-type: none"> Compliance Committee Management HR Department/team | | |
| 8 | [Responsible manager and HR] decide and take appropriate actions and measures | <ul style="list-style-type: none"> Based on the recommendation, the [responsible manager and HR team] take appropriate actions and measures. The [responsible manager and HR team] update the case receiver or the [Compliance Officer] about the outcome. | <ul style="list-style-type: none"> Management HR Department/team | | |
| 9 | The case receiver keeps a record of the case, closes the case and reports the outcome back to the reporting person and the committee | <ul style="list-style-type: none"> The case receiver or the [Compliance Officer] keeps records of the case confidential and ensures that no one has access to them except authorized personnel. The case receiver or the [Compliance Officer] closes the case and reports the | <ul style="list-style-type: none"> Compliance Officer Compliance Team Line manager Chairperson of the Board Deputy Chairperson of the Board | | The closing of the case takes [1 to 7] working days. |

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| | | outcome back to the reporting person and the [Compliance Committee]. | | | |
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