



DCA POLICY: **WHISTLEBLOWER SCHEME**

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Table of Contents

1. DEFINITIONS-	1
2. INTRODUCTION	3
3. LEGAL BASIS	3
4. PURPOSE	4
5. SCOPE OF DCA WHISTLEBLOWER SCHEME	4
5.1. WHO CAN USE THE SCHEME?	4
5.2. WHAT CAN BE REPORTED?	5
5.3. WHAT SHOULDN'T BE REPORTED?	6
6. PROCEDURES AND REQUIREMENTS	6
6.1. HOW TO REPORT TO THE SCHEME?	6
6.2. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS	7
6.3. CONFIDENTIALITY AND ANONYMITY	7
6.4. DCA WHISTLEBLOWER SCHEME	8
6.5. DCA WHISTLEBLOWER SCHEME'S ORGANIZATIONAL STRUCTURE	8
6.6. HANDLING AND PROCESSING OF WHISTLEBLOWER REPORTS	8
6.7. WHISTLEBLOWER INVESTIGATIONS ADVISOR TASKS	9
6.8. PROFESSIONAL SECRECY AND CONFIDENTIALITY	10
6.9. RIGHTS OF THE PERSON SUBJECT TO A REPORT	10
6.10. INFORMATION ON DCA WHISTLEBLOWER SCHEME	10
6.11. INFORMATION ON THE NATIONAL WHISTLEBLOWER SCHEME	10
6.12. PROCESSING OF PERSONAL DATA	10
7. POLICY INFORMATION	11
APPENDIX 1: DCA WHISTLEBLOWER SCHEME SCOPE EXAMPLES	12
APPENDIX 2: PUBLIC INTEREST TEST	14

1. Definitions

- 1.1. **Affected Persons:** A person who is identified in the Whistleblower report or public disclosure as a person to whom the violation is attributable or with whom the person is associated.
- 1.2. **Authorized person:** A person appointed by DanChurchAid (DCA) to receive and investigate reports within DCA Whistleblower Scheme. Authorized persons are bound by a duty of professional secrecy in relation to information contained within reports and may be held personally liable in the event of intentional or gross negligence of professional secrecy.
- 1.3. **DCA guidelines:** Any official policies or guidelines, manuals or other directive documents containing information about guidelines or conduct in DCA.
- 1.4. **Employee:** An individual who has a formal employment contract with DanChurchAid. This contract outlines the terms and conditions of their employment, including job responsibilities, salary, benefits, and duration of employment. Employees may be stationed in DCA's headquarters in Copenhagen, Denmark, or in one of its many field offices located in regions where DCA operates.
- 1.5. **External reporting:** Notification of information about violations received in the National Whistleblower Scheme, which is administered by the Danish Data Protection Agency.
- 1.6. **Facilitators:** Individuals or organizations who provide assistance or support to whistleblowers in reporting concerns about unlawful activities, misconduct, or other breaches of law. This support can be legal, practical, or emotional, and is intended to help whistleblowers navigate the often complex process of making a disclosure.
- 1.7. **Feedback:** Notification to the whistleblower of information about follow-up and the reasons for such follow-up.
- 1.8. **Information about violations:** Any information, including reasonable grounds to believe that actual or potential violations have occurred or are very likely to occur in DCA where the Whistleblower works or has worked, or in another organization with which the Whistleblower is or was in contact through his or her work, as well as about attempts to conceal such violations.

- 1.9. **Internal reporting:** Notification of information about violations received in DCA Whistleblower Scheme.
- 1.10. **Reasonable Grounds:** Means that your belief about a situation is in good faith and based on more than just feeling, there must be some information to support your belief. Another person in the same situation would also have that belief based on the information.
- 1.11. **Reprisals:** Any direct or indirect act or omission that takes place in a work-related context, that causes or may cause unjustified harm to the Whistleblower, that is a consequence of using an internal or external reporting scheme.
- 1.12. **Serious violations:** Any illegal, unethical, or non-compliant or omission that violates laws, regulations, or internal policies, these must be matters whose disclosure is in the public interest.
- 1.13. **The National Whistleblower Scheme:** The external Whistleblower Scheme administered by the Danish Data Protection Agency (Datatilsynet).
- 1.14. **Whistleblowing:** Whistleblowing is the confidential reporting by an individual, or individuals, that relates to serious violations or wrongdoings at work. To be classified as whistleblowing, the disclosure of the report must be in the public interest and concern serious violations that are happening, have happened or will happen. Information on who DCA Whistleblower Scheme covers can be found in Section 5.1.
- 1.15. **Work-related context:** Current or past work-related activities, regardless of the nature of those activities, where persons gain access to information on violations and where those persons could suffer retaliation if they reported such information.

2. Introduction

DanChurchAid (DCA) has developed DCA Whistleblower Policy to further facilitate and encourage accountability within our organization. DCA Whistleblower Scheme is established to provide a secure and confidential mechanism within which persons with work-related connections can report serious violations or suspected serious violations related to DCA's work, without fear of reprisals.

DCA's commitment to conducting our work with honesty, integrity and accountability started 15 years ago with the introduction of DCA Complaints System; the introduction of DCA Whistleblower Scheme sets out to reinforce these values within DCA. DCA Whistleblower Scheme handles primarily serious violations that are in the public interest, providing special protections to employees when they report these serious violations or "sensitive complaints" as they are referred to in DCA Complaints System.

The objective of DCA Whistleblower Policy is to define what a Whistleblower is, clarify who can use the scheme and what matters fall within the parameters of the scheme.

In addition, it sets out the principles and standards for how the cases are handled once received by the Authorized Person, what measures are taken to guarantee confidentiality and the safeguarding of the Whistleblower.

This policy recognizes the requirements of the EU Whistleblowing Directive 2019 and The Danish Whistleblower Act 2021.

Lastly, this policy contains references to DCA Complaints System as well as the National Whistleblower Scheme administered by the Danish Data Protection Agency.

3. Legal Basis

DCA Whistleblower Scheme is established pursuant to The Danish Whistleblower Act 2021, " Lov om beskyttelse af whistleblowere".

The Danish Whistleblower Act 2021 is an implementation of the EU Parliament's and Council directives on the protection of persons who report violations of EU law, into Danish law.

4. Purpose

DCA is an organisation which is committed to protecting those that need it the most, to uphold and promote human rights globally. Therefore, DCA is expected to operate with the highest standards and morals, and to conduct its work in a transparent and accountable manner. DCA Whistleblower Scheme has been established to reinforce DCA's mission to conduct all our work with honesty, integrity and accountability. It also serves to protect DCA by revealing serious violations that could damage the public's perception of DCA, allowing DCA to rectify mistakes, manage risks, improve and develop throughout the organisation.

DCA has established the Whistleblower Scheme and subsequent policy to:

- Expand opportunities for employees of DCA, as well as other specified groups, to speak out and bring impermissible circumstances to light within DCA without the fear of reprisals.
- Protect individuals who report wrongdoings through DCA Whistleblower Scheme.
- Promote confidence that all cases reported will be thoroughly and impartially investigated.
- Detect illegal or unethical incidents within DCA, which will be addressed in a prudent and proportionate manner.
- Strengthen DCA's culture of transparency and accountability, thereby protecting DCA's global work and reputation.
- Ensure DCA is complying with international and national laws and internal guidelines.

5. Scope of DCA Whistleblower Scheme

5.1. Who Can Use the Scheme?

DCA Whistleblower Scheme covers persons who are currently or have previously conducted work-related tasks on behalf of DCA, namely;

- Employees,
- Members of DCA Council,
- Senior Management,
- Board Members,
- Interns.

If you perform work on behalf of DCA through partners, suppliers, service contractors; or if you are a DCA donor or a DCA volunteer; or if you are impacted by DCA's projects, you are

encouraged to utilize DCA's Complaints System or the Danish National Whistleblower Scheme.

5.2. What Can be Reported?

Whistleblowing is the confidential reporting by an individual, or individuals, that relates to serious violations or wrongdoings at work, including reasonable grounds to believe they have information. To be classified as whistleblowing, the disclosure of the report must be in the public interest and concern serious violations that are happening, have happened or will happen. The serious violations must concern one or more of the following:

- Criminal Offences
- Danger to Health and Safety
- Environmental Damage
- Serious Ethical Breaches
- Financial Misconduct
- Serious Breaches of DCA's code of conduct and related policies (including but not limited to DCA's Anti-Corruption Policy, DCA's Child Safeguarding Policy, DCA's Prevention of Sexual Exploitation, Abuse and Harassment Policy),
- Violations of EU Law, that fall within purview of the EU Whistleblower Directive 2019,
- Serious Violations of Danish Law.

The above are only examples. All reports made through DCA Whistleblower Scheme will be assessed, reports that fall within the scope will be handled as whistleblower reports.

Reports that cannot be handled with DCA Whistleblower Scheme will be referred to the relevant channel with DCA Whistleblowers' permission.

DCA Whistleblower Scheme is a supplementary scheme to the pre-existing reporting channels; immediate line manager, directors, HR representatives or DCA's Complaints System. It is not meant to replace them. The other reporting mechanisms present in DCA are tailored to different levels of concerns and facilitates DCA's culture of openness and transparency. It allows DCA's staff to feel empowered to speak up about wrongdoings and resolve all issues irrelevant of their nature.

It is encouraged to use DCA Whistleblower Scheme, however, should the Whistleblower not feel comfortable they can utilize the Danish National Whistleblower Scheme on the following link <https://whistleblower.dk/>

If you are uncertain whether something is within the scope of this policy, you are encouraged to use DCA Whistleblower Scheme. You can also get further information from DCA's website [Whistleblower Scheme - DanChurchAid](#)

5.3. What Shouldn't be Reported?

Incidents that do not relate to criminal offences, or serious violations should not be reported via DCA Whistleblower Scheme but rather the existing channels, such as direct line manager, HR or DCA Complaints System.

Incidents that **do not** pertain to serious and/or repeated breaches of Internal Policies are not covered by DCA Whistleblower Scheme. The following is not an extensive list but rather examples;

- Sick Leave
- Maternity Leave
- Dress Code
- Smoking
- Alcohol Consumption
- Dissatisfaction with Management
- Minor Staff Conflicts
- Employment & Salary Grievances

For further information regarding these avenues please consult your direct line management, HR or DCA Complaints System Policy.

6. Procedures and Requirements

6.1. How to Report to the Scheme?

Whistleblower reports are submitted and handled through a web-based portal; the portal's technology is managed by an external vendor. The portal can be accessed via the following link: [FKN Whistleblower System | Home \(whistleblowersoftware.com\)](#)

This link will take you to the Whistleblowing portal where you will find additional information and a reporting form that must be completed.

The portal can only be read by authorized persons – the list of persons being very selective and only those that have a distinct need will be able to read reports on the portal. Management of the portal will be controlled by a personal login and passcode, which must not be shared with any other person.

6.2. Protection and Support for Whistleblowers

DCA acknowledges and appreciates that becoming a whistleblower is not an easy decision, and the Whistleblower may be concerned about the repercussions of submitting a report.

DCA will not take any disciplinary action against a Whistleblower if the report was made in good faith and with genuine concern, irrespective of the outcome of the case.

The Danish Whistleblower Act 2021 stipulates that a special protection right applies to Whistleblowers before, during and after they have submitted their report through the scheme. Individuals who submit a report through DCA Whistleblower Scheme will not face any liability or sanctions for breaching their statutory duty of confidentiality, provided that the Whistleblower has reasonable grounds to believe it is necessary to disclose this information as it pertains to matters covered under DCA Whistleblower Scheme.

DCA will not tolerate any harassment, bullying, intimidation of Whistleblowers, and action will be taken against the perpetrators to protect the Whistleblower if evidence proves guilt.

Whistleblowers will not be subject to reprisals (e.g. suspension, dismissal, demotion or non-promotion, transfer of duties, reassignment to a different position, reduction in pay, changes to working hours, refusal of access to training activities, negative assessment of the person's performance) because of submitting a report in good faith, and disciplinary action will be taken against individuals who prevent or attempt to prevent the Whistleblower from reporting.

These protections also extend to facilitators, whom are individuals or organisations that assist the Whistleblower in any way with the reporting process. They too will be protected from reprisals and retaliation.

If a whistleblower experiences any reprisals because of their report, they must contact the Head of Risk and Compliance Control Unit. If the matter is not remedied by the internal channels, then they should raise it to the Danish National Whistleblower Scheme.

However, if a malicious or false allegation has been submitted through DCA Whistleblower Scheme, the individual will be subjected to disciplinary action. Note, there is a distinct difference between a false allegation, and a case that could not be pursued due to insufficient evidence. No disciplinary action will be taken against the latter.

This policy and the legal basis of DCA Whistleblower Scheme gives the full protection from reprisals to individuals hired under a Danish Labour Contract.

6.3. Confidentiality and Anonymity

DCA Whistleblower Scheme must ensure that a Whistleblower's identity is not intentionally or unintentionally compromised, this right also extends to facilitators.

The Whistleblower's identity will not be disclosed without explicit consent.

The Whistleblower reporting portal facilitates anonymous reporting, the technical solution enables the process of anonymous inquiries, within which anonymous dialogue can exist between the case investigator and the whistleblower.

Although the Whistleblower portal allows anonymous reporting, DCA encourages Whistleblowers to come forward with their identity/name. Anonymous reports can complicate the investigation and delay the investigation of certain lines of enquiry. DCA is confident that it can maintain confidentiality and protect Whistleblowers.

6.4. DCA Whistleblower Scheme

DCA Whistleblower Scheme is administratively managed by the Risk and Compliance Control Unit, within which the Investigations Advisor will be the authorized person to receive and investigate all reports submitted through DCA Whistleblower Scheme. The Investigations Advisor is appointed by and directly reports to the Head of the Risk and Compliance Control Unit.

The Investigations Advisor must remain objective and professional in the investigation of all cases and remain impartial throughout the process. The Risk and Compliance Control Unit is independent of DCA's Senior Management in the day-to-day operations.

6.5. DCA Whistleblower Scheme's Organizational Structure

DCA Whistleblower Scheme is managed by the Risk and Compliance Control Unit and is supervised by the DCA Board.

The Investigations Advisor submits the reports and conclusions of the investigation to the Whistleblower Committee who will decide on the outcome of the case.

The Whistleblower Committee consists of three members of DCA's Senior Management Team, as described in the Terms of Reference of the Whistleblower Committee.

The Whistleblower Committee is bound by the same confidentiality rules covered by the Danish Whistleblower Act 2021.

If a case is received which contains allegations against any of DCA's Members of Senior Management, then the Investigations Advisor will by-pass the Whistleblower Committee and General Secretary and proceed directly to the DCA Board for any decisions in the matter.

6.6. Handling and Processing of Whistleblower Reports

Once a Whistleblower report is received, the Investigations Advisor will confirm receipt of the report within 7 working days to the Whistleblower. Upon the completion of the initial assessment, the Whistleblower will be informed if the report falls within the scope of DCA Whistleblower Scheme.

The Whistleblower reports received will all be processed and stored to maximize the confidentiality of the Whistleblower, and it will be ensured by all measures possible that the case is not accessed by any unauthorized persons.

If it is determined that the case is within the scope of DCA Whistleblower Scheme, an investigative strategy will be created and presented to the Whistleblower Committee by the Investigations Advisor. Depending on the nature of the report, the Investigations Advisor will conduct the investigation or outsource it to the appropriate agent, which can consist of internal or external parties. The Investigations Advisor will remain in charge of the investigation, overseeing and advising throughout.

However, if a report contains allegations of severe criminal offences, DCA has a duty to report the case to local authorities.

Once the investigation has concluded, the conclusions will be presented to the Whistleblower Committee to assess and decide the outcome. The Investigations Advisor does not have any authority to dictate the sanctions taken as a result of the investigation.

The Whistleblower will receive feedback from the Investigations Advisor, which will stipulate the overall outcome of the case, and if appropriate, the actions taken to resolve the matter.

All DCA employees have a duty and are obliged to collaborate loyally and fully during the investigation of any Whistleblower case.

6.7. Whistleblower Investigations Advisor Tasks

The Investigations Advisor will be the first point of contact for submitted Whistleblower reports, whose responsibility it is to make the initial assessment of the case. The Investigations Advisor will assess the case against preset conditions to determine if the case falls within the remit of DCA Whistleblower Scheme or if it needs to be redirected to a more appropriate reporting channel.

If a case is determined to fall within the scope of DCA Whistleblower Scheme, the Investigations Advisor will then produce an investigative strategy to the Whistleblower Committee and oversee the investigation of the report impartially.

The Investigations Advisor will ensure the case is processed in accordance with the Danish Whistleblower's Act and applicable law, including the General Data Protection Regulation (GDPR) legislation.

The Investigations Advisor will be responsible for the ongoing communication with the Whistleblower, from receipt of the initial report to ongoing developments and conclusion.

6.8. Professional Secrecy and Confidentiality

All information related to the Whistleblower cases is administered to ensure the confidentiality of the Whistleblower, affected persons and third parties mentioned in the report.

Any person who handles a Whistleblower case has a duty of confidentiality regarding all information contained within the reports, including information that may be attributable to revealing the Whistleblower's identity. Any acts of gross negligence relating to these standards can be held liable pursuant to the Danish Whistleblower Act.

6.9. Rights of the Person Subject to a Report

The person or persons who are named as a subject in the Whistleblower reports does not have an automatic or immediate right to be informed that there is an investigation ongoing.

The subject of the report does have a right to a fair process, meaning that should the investigation lead to formal actions against the subject (disciplinary, legal, etc.), the subject will be informed and given the opportunity to provide the subject's side of the story.

This disclosure will take place at the most appropriate time, which could be when the subject's input is needed for the investigation, and more importantly, when it has been determined that it will not jeopardise the investigation or the confidentiality rights of the Whistleblower.

6.10. Information on DCA Whistleblower Scheme

Information related to DCA Whistleblower Scheme, including the reporting process can be found on DCA's public websites and on the intranet.

6.11. Information on the National Whistleblower Scheme

Information related to the Danish National Whistleblower Scheme, including the reporting process can be found on DCA's public websites and on the intranet.

Information about the Danish National Whistleblower Scheme is provided in conjunction with DCA Whistleblower Scheme

6.12. Processing of Personal Data

Personal data is processed in accordance with the relevant DCA data privacy policies, and GDPR.

As stipulated in the Danish Whistleblower Act under Section 22, the processing of personal data may take place if it is necessary for the progression of a case received through DCA Whistleblower Scheme.

The personal data procured as a result of a Whistleblower investigation will only be stored for as long as necessary and will be stored in a proportionate format in pursuant of the Danish Whistleblower Act and GDPR. According to donor requirements the retention period is minimum 10 years. All personal data will be safely and securely stored in accordance.

There may be circumstances whereby there is a legitimate reason for continued storage of personal data, e.g., if required for criminal proceedings, if required under another law or if it is necessary to fulfill a donor requirement. If this is the case the personal data will only be kept for the minimum required time.

7. Policy Information

First Approval: October 2024

Latest Revision: October 2024

Effective From: November 2024

Next Revision Before: 31 December 2028

Owner: Head of Risk and Compliance Control Unit

Appendix 1: DCA Whistleblower Scheme Scope Examples

Accounting Issues & Fraud

- Embezzlement of Funds
- Falsifying Financial Records and Accounting Manipulation
- Misuse of Funds and Company Assets
- Vendor Fraud

Criminal Offences

- Fraud
- Theft
- Sexual Assault
- Exploitation
- Physical Assaults

Whistleblower Related

- Breaches of Confidentiality due to Gross Negligence or Purposeful Disclosure.
- Failing to Disclose Conflicts of Interest.
- Retaliation

Data Protection

- Purposeful or gross negligence around processing and storage of personal data.
- Unauthorized Use of Confidential Information.

Employee Related

- Bribery and Corruption
- Conflict of Interest
- Accepting Kickbacks
- Extortion

Health & Safety

- Unsafe Working Conditions
- Failure to provide adequate safety protocols
- Failure to live up to safety protocols

Harassment & Discrimination

- Sexual Harassment
- Serious Work-Place Harassment
- Discrimination based on age, gender, religion, race, sexual orientation, abilities, or ethnic affiliation.
- Intimidation

Environmental Violations

- Illegal dumping of hazardous materials
- Violations of environmental regulations
- Destruction of protected habitats

Violations of European Law

- Data Breaches
- Non-compliance with data subject rights
- Market Manipulation
- Violation of Anti-Money Laundering/Countering the Financing of Terrorism laws and Regulations
- Non-compliance with the Emissions Trading System
- Breaches of the Water Framework Directive
- Violation of REACH Regulations
- Breach of Food Safety Regulations
- Violations of Consumer Rights Directive
- Non-compliance with Product Safety Standards
- Breaches of Equality Directives
- Violations of the Charter of Fundamental Rights of the European Union
- Violating EU Tax Law Directives
- Non-Compliance with working time directive

Serious Violations of Danish Law

- Violations of Danish Data Protection Act
- Breaches of the Danish Employment Contracts Act
- Violation of the Working Environment Act
- Unfair Dismissal Practices
- Tax Evasion
- Bribery of Public Officials
- Public Corruption
- Non-Compliance with the Danish Public Procurement Act
- Non-Compliance with Product Safety Requirements
- Violations of Danish Environmental Protection Act
- Violations of Danish Working Environment Act
- Breach of the Danish Health and Safety at Work Act
- Violation of the Danish Anti-Discrimination Act
- Breach of Privacy Rights
- Non-Compliance with the Danish Food Act

Appendix 2: Public Interest Test

According to Danish Whistleblower Act 2021, which is aligned with the EU Whistleblower Directive, "public interest" refers to matters that go beyond individual or organizational concerns and have broader implications for society, public safety, or the common good.

Democratic Values

- **Definition:** This area encompasses breaches that undermine democratic principles, such as transparency, accountability, and the rule of law. It includes reporting on election fraud, suppression of free speech, or abuses of power by public officials. Protecting democratic values is essential for ensuring the proper functioning of democratic institutions and preserving public trust in governance.
- **Example:** A government agency or organization censors or retaliates against individuals or media outlets for expressing dissenting opinions, undermining freedom of expression and the free press.

Environmental Protection

- **Definition:** Promoting good environmental habits, pushing to safeguard the environment and natural resources. Encouraging the use of renewable energy to preserve the environment for our future generations. Breaches in environmental protection can include illegal dumping of pollutants, failure to comply with environmental regulations, or practices that contribute to environmental degradation. Reporting such breaches helps protect natural resources, public health, and ensure compliance with environmental standards.
- **Example:** A company illegally discharges hazardous waste into a river, threatening the health of the local community and the environment. Reporting this would be in the public interest because it protects public health and environmental sustainability.

Public Health and Safety

- **Definition:** Focus on issues that impact the overall health and safety of the public, this is through measures to prevent diseases, information campaigns on health lifestyles and an adequate healthcare service. It includes breaches such as unsafe practices in healthcare facilities, failure to adhere to public health regulations, or the distribution of unsafe products. Ensuring that health and safety regulations are followed is crucial for preventing harm and protecting the well-being of individuals and communities.
- **Example:** A food processing plant fails to meet hygiene standards, leading to the risk of contamination in products that could cause widespread foodborne illnesses. Reporting such violations is in the public interest as it safeguards public health.

Financial Misconduct

- **Definition:** This area involves the transparency and integrity of financial practices. It includes reporting on financial misconduct such as fraud, corruption, money laundering, or tax evasion. Protecting financial integrity is vital for maintaining trust in financial systems, preventing economic harm, and ensuring that public and private funds are used appropriately.
- **Example:** Executives manipulate financial statements to hide losses, misleading investors and stakeholders. Reporting this is crucial for maintaining market integrity and protecting investors.

Corruption & Abuse of Power

- **Definition:** Addresses misuse of power for personal gain or to the detriment of public interests. It includes reporting instances of bribery, nepotism, or other forms of corruption within public and private institutions. Addressing corruption is essential for ensuring fairness, transparency, and trust in governance and institutional operations.
- **Example:** A public institution misappropriates funds intended for public projects, diverting them for personal or unauthorized use. Reporting this helps ensure that public resources are used properly and for their intended purpose.

Workplace Safety & Rights

- **Definition:** Issues related to the safety and rights of employees. It includes reporting unsafe working conditions, violations of labor laws, or discriminatory practices. Ensuring a safe and equitable workplace is crucial for protecting workers' rights and promoting a healthy working environment.
- **Example:** A construction company ignores safety protocols, endangering workers and the public. Reporting this could prevent accidents and fatalities, serving the broader public interest.

Data Protection & Privacy

- **Definition:** This area involves the protection of personal data and privacy. It includes reporting breaches of data protection regulations, such as unauthorized access or misuse of personal information. Upholding data protection laws is crucial for safeguarding individuals' privacy and maintaining trust in how personal data is handled.
- **Example:** A company fails to protect personal data, leading to breaches that expose individuals to identity theft or other harm. Reporting these violations is in the public interest as it ensures compliance with data protection laws and safeguards individuals' privacy.