

PROTECTION OF WHISTLEBLOWERS IN PRACTICE

Four Years of Experience of the Slovak Office

JÁN IVANČÍK
August 2025



Co-funded by
the European Union



TRANSPARENCY
INTERNATIONAL
SLOVENSKO

PROTECTION OF WHISTLEBLOWERS IN PRACTICE

BRATISLAVA, 23 AUGUST 2025

THIS PUBLICATION WAS CREATED WITHIN THE PROJECT SAFE FOR WHISTLEBLOWERS (STRENGTHENING AND SUPPORTING A FAVORABLE ENVIRONMENT FOR WHISTLEBLOWERS IN THE EU). MORE INFORMATION ABOUT THE PROJECT CAN BE FOUND AT:
[HTTPS://TRANSPARENCY.SK/EN/SAFE-FOR-WHISTLEBLOWERS/](https://transparency.sk/en/safe-for-whistleblowers/)

FUNDED BY THE EUROPEAN UNION. HOWEVER, THE VIEWS AND OPINIONS EXPRESSED IN THIS TEXT ARE SOLELY THOSE OF THE AUTHORS AND DO NOT NECESSARILY REFLECT THOSE OF THE EUROPEAN UNION OR THE EUROPEAN EDUCATION AND CULTURE EXECUTIVE AGENCY (EACEA). NEITHER THE EUROPEAN UNION NOR THE GRANT PROVIDER CAN BE HELD RESPONSIBLE FOR THEM.

©2025 TRANSPARENCY INTERNATIONAL SLOVAKIA. ALL RIGHTS RESERVED.



Co-funded by
the European Union



TRANSPARENCY
INTERNATIONAL
SLOVENSKO

INTRODUCTION

The Office for the Protection of Whistleblowers (“the Office”) was established in 2021 as a key pillar of the practical application of whistleblower protection – that is, the protection of individuals who decide to report misconduct they have become aware of in their workplace. The very process of its creation, which stretched over almost two years, already indicated that the implementation of the law would not be straightforward.

Within Europe, the Slovak Republic ranks among the countries with above-standard legislative protection of whistleblowers. In practice, however, this protection long remained predominantly formal and more symbolic than effective. The establishment of a separate authority, equipped with its own budget, professional background, and competencies to systematically address the protection of whistleblowers, represented a fundamental shift compared to the previous state. The agenda was transferred from the overburdened labor inspectorates to a specialized institution whose role is not only to promote whistleblowing and carry out awareness-raising activities, but also to oversee compliance with legal obligations, grant rewards to individuals who contribute to uncovering significant cases, and sanction those who fail to respect their duties.

In the system of strengthening the integrity of public administration and safeguarding the public interest, the Office constitutes a significant institution. After its initial years of operation, it can be stated that although it would be unfair to expect radical or revolutionary changes, it is justified to evaluate the first results of its activities and their impact on practice.

The aim of this assessment is therefore to examine in detail the functioning of the Office, to analyze its activities from both a quantitative and qualitative perspective, and to assess the extent to which it contributes to building an environment in which whistleblower protection is genuinely ensured and not merely declared by legislation.

The evaluation also includes an assessment of the Office’s transparency, the results of its analytical work, its communication with third parties, and its financial management. It is also important to note that one of the fundamental objectives of whistleblowing is to uncover misconduct and thereby generate savings for the state. In this respect too, significant expectations are placed on the Office.

1. LEGISLATIVE DEVELOPMENT

The beginnings of legal protection for whistleblowers of anti-social activities in Slovakia date back to 2014, when the National Council of the Slovak Republic adopted Act No. 307/2014 Coll. This Act was the first comprehensive attempt to provide legal protection to people who report corruption or other serious violations. It introduced the concept of a protected whistleblower, the possibility to apply to the labour inspectorate for protection, and the obligation for larger employers to establish internal reporting channels. Although this was an important step, practice showed that the Act was cumbersome and in real life often failed to fulfil its mission. Many provisions were little known, and the protection itself frequently proved insufficient.

Therefore, a more substantial reform was undertaken. In 2019, an amendment was adopted that fundamentally changed the system. The most significant institutional innovation was the establishment of the Office for the Protection of Whistleblowers, which began operating in March 2021. The Office became an independent authority with its own competences and took over from labour inspectorates the key role in protecting whistleblowers. Its mission is not only to grant the status of a protected whistleblower but also to provide methodological guidance to employers, monitor compliance with the law, and, above all, provide practical support to individuals who decide to report misconduct.

This step placed Slovakia among the countries that have a specialized institution dedicated exclusively to this area. The Office became a visible symbol that whistleblowing is no longer a marginal issue but part of the state's broader anti-corruption policy. An important moment was also the alignment of Slovak legislation with the European Directive 2019/1937, which obliged Member States to establish effective channels for reporting breaches of EU law and to protect those who report them. Slovakia gradually began to extend the scope of the Act to the private sector and to adapt its rules to European standards.

After 2019, the development focused on two main lines: the institutional strengthening of protection through the Office for the Protection of Whistleblowers and the legislative alignment with European rules. The Act was amended several times in order to remove practical shortcomings, speed up the process of granting protection, and provide whistleblowers with greater certainty. At the same time, the Office began to organize awareness-raising activities, publish methodological guidance, and increase awareness of the possibilities available to employees in cases where they witness corruption, mismanagement, or other misconduct.

2. COMPETENCIES OF THE OFFICE

The Office for the Protection of Whistleblowers is a key institution established to provide support to people reporting corruption and other anti-social activities.

The Office is vested with a wide range of powers. These are not only a formal framework but also a practical tool that enables the Office to protect the rights of individuals, monitor employers, and contribute to building a culture of transparency. The following overview shows how broad and diverse the competences of the Office are, and how they are reflected in its day-to-day activities.

One of the fundamental powers of the Office is **decision-making in matters of whistleblower protection**. This is a process in which the Office assesses whether a particular individual meets the legal requirements for being granted the status of a protected whistleblower. If such status is granted, it means that the whistleblower obtains legal guarantees and protective mechanisms designed to prevent retaliatory measures from the employer or other persons. The Office likewise decides on the termination of protection once the conditions for its provision cease to exist.

The Office also has an important **supervisory power**. It monitors compliance with the Whistleblower Protection Act, and its staff are authorized to carry out inspections in accordance with specific regulations. Supervision focuses on several areas. First, the Office examines how whistleblower protection is provided and implemented in practice. Second, it reviews the behaviour of employers or other persons towards the whistleblower, in particular whether there is discrimination, harassment, or other forms of retaliation. Finally, supervision also covers the **internal reporting systems** that employers are obliged to establish and maintain. In this way, the Office ensures that internal mechanisms function not only on paper but also in everyday practice.

If the Office finds that an attempt has been made to retaliate against a whistleblower in connection with their report, it is obliged to **notify the competent authorities**. These may include law enforcement authorities, labour inspectorates, or other institutions with the competence to intervene. The Office thus acts as a connecting link that ensures suspicions do not go unnoticed but reach the bodies empowered to take action.

In addition to decision-making and supervisory functions, the Office also has an **educational and preventive role**. The law requires it to raise awareness among the public and employers about the importance of reporting anti-social activities and about the possibilities of protection. It fulfils this role through information campaigns, publications, methodological materials, and public discussions. The goal is to eliminate prejudices associated with whistleblowing and to convince society that reporting misconduct is, in the end, an expression of civic courage and responsibility.

The Office also **provides guidance to employers**, particularly in drafting internal regulations and mechanisms for handling reports. Employers are required to establish a system through which their employees can safely report suspicions of anti-social activities. The Office advises them on how to design such systems so that they are both effective and compliant with the law. In addition, it **provides counselling and consultations to individuals** considering whether to submit their suspicions to the competent authorities. In this way, it helps whistleblowers navigate the options and risks associated with the reporting process.

An important competence of the Office is also the issuing of **expert opinions and methodological guidelines**. In this way, the Office provides interpretation of the law, offers explanations of disputed provisions, and guides practice. At the same time, it organizes training and professional preparation for responsible persons in companies and institutions who receive and review reports. These activities increase the professionalism of the system and help ensure that whistleblowers can trust their reports will be handled sensitively and correctly.

The Office is also active in the field of **law-making**. Based on its experience and findings, it submits proposals to central government authorities for changes or amendments to legal regulations. It cooperates with ministries, as well as with non-governmental organizations and the Slovak National Centre for Human Rights, to continuously improve the legal framework. This dialogue with both governmental and civic actors is essential to ensure that legislation corresponds to the real needs of society.

A significant part of the Office's activities also consists of **international cooperation**. The Office maintains contact with similar institutions in other EU Member States as well as with global organizations. It exchanges experiences, participates in joint projects, and follows trends in whistleblower protection. Thanks to this, the Slovak system can draw inspiration from abroad while at the same time contributing its own experience to the international debate.

Finally, the law authorizes the Office to **carry out other tasks** arising from legal regulations or from its position within the system of public administration. This gives it the flexibility to respond to new challenges that may emerge in practice – for example, in connection with the digitalization of reporting channels or the protection of whistleblowers' personal data.

3. TRANSPARENCY OF THE OFFICE

When assessing the openness and transparency of an institution, two regimes come into consideration through which citizens may attempt to obtain information from a public body. The first is the proactive publication of information by the institution itself – in our case, the Office. The second is the provision of information upon request by a citizen. Both forms are based on Act No. 211/2000 Coll. on Free Access to Information and on Amendments to Certain Acts (Freedom of Information Act), as amended.

Mandatory Publication of Documents

Mandatory publication of information by the Office is a statutory obligation of a public body as an obliged entity under § 2(1) of the Freedom of Information Act. In this context, it should be noted that the Office is an obliged entity with full information duties pursuant to this Act.

In evaluating the transparency of the Office, we therefore focused on whether the Office fulfils its statutory obligations, in what form, and whether it also follows best practices which, while not required by law, provide citizens with greater comfort and accessibility of data.

On the Office's website, invoices and purchase orders are published in a clear and structured format, as well as basic information about the functioning of the Office. These are provided in both Slovak and English language versions. The clarity of the website deserves recognition, as the required data can be intuitively located in the

section “About Us” – “Documents” – “Operation of the Office” – “Office’s Financial Management.”

www.oznamovatelia.sk/o-nas/dokumenty/fungovanie-uradu/hospodarenie-uradu/

ÚRAD NA OCHRANU
OZNAMOVATEĽOV

O nás Naše činnosti FAQ Aktuality EN

Hlavná stránka » O nás » Dokumenty » Fungovanie úradu » Hospodárenie úradu

Hospodárenie úradu

Centrálny register zmlúv (CRZ) »

2025

Plán verejného obstarávania na rok 2025 [.xlsx, 57 kB]
Faktúry [.xlsx, 44 kB]
Objednávky [.xlsx, 24 kB]

2024

Plán verejného obstarávania na rok 2024 [.xlsx, 190 kB]
Faktúry [.xlsx, 66 kB]
Objednávky [.xlsx, 29 kB]

2023

Faktúry [.xlsx, 64 kB]
Objednávky [.xlsx, 36 kB]

2022

Faktúry, zmluvy a objednávky [.xlsx, 158 kB]

2021

Faktúry, zmluvy a objednávky [.xlsx, 117 kB]

Source: oznamovatelia.sk

Data on purchase orders and invoices are published in an Excel table, with machine-searchable functionality.

Plán verejného obstarávania na rok 2025

ID	Predmet verejného obstarávania	Sučasný opis predmetu zákazky	Počet kusov/opakov	Predpokladaný termín VČ	Predpokladaná suma kumulatívne s D gestor	Zdroj financovania	Postup VO	CPV-kód
1	Kancelárske potreby	Kancelárske potreby - kancelársky papier, písacie potreby a pod.	12 mesiacov	január 25	4 500,00 €	ÚOO	SR	postup mimo zákon o VO §1 ods. 30190000-7
2	Hygienické a čistiace prostriedky	Hygienické a čistiace prostriedky - hygienické utierky, čistiace prostriedky, čistiace pomôcky	12 mesiacov	január 25	1 000,00 €	ÚOO	SR	postup mimo zákon o VO §1 ods. 39800000-0
3	Revúzie	Rôzne povinné revúzie v rámci facility managementu	12 mesiacov	január 25	9 000,00 €	ORS	SR	postup mimo zákon o VO §1 ods. 50530000-9
4	Zvýšenie bezpečnosti unikových cieľ	Protipožiarne a iné dvere, zárubne, kovania, zámk	1	márc 25	50 000,00 €	ÚOO	SR	postup mimo zákon o VO §1 ods. 44221220-3
5	Pravidelný prieskum	Prieskumy verejnej mienky v oblasti ochrany oznamovateľov	3	máj 25	7 000,00 €	AO	SR	postup mimo zákon o VO §1 ods. 79300000-7
6	Reklamné predmety	Reklamné predmety - merch	3	márc 25	2 500,00 €	OPAK	SR	postup mimo zákon o VO §1 ods. 39294100-0
7	Výpočtová technika	Výpočtová technika - PC, monitory, príslušenstvo	12 mesiacov	júl 25	10 000,00 €	ÚOO	SR	postup mimo zákon o VO §1 ods. 30200000-1
8	Displayr	Licencia - nástroj na štatistickú analýzu	1	september 25	2 600,00 €	AO	SR	postup mimo zákon o VO §1 ods. 48000000-8
9	Licencie Office365 Premium	Licencie balíkov kancelárskych softwarov	12 mesiacov	október 25	6 000,00 €	ORS	SR	postup mimo zákon o VO §1 ods. 48000000-8
10	Alchimer	Licencia - nástroj na dotazníkové prieskumy	1	november 25	360,00 €	AO	SR	postup mimo zákon o VO §1 ods. 48000000-8
11	Dodávka elektrickej energie	Dodávka elektrickej energie na rok 2026	12 mesiacov	november 25	4 000,00 €	ORS	SR	postup mimo zákon o VO §1 ods. 65300000-6
12	Prírodné vedenie mozovej agendy	Spracovanie mied	12 mesiacov	november 25	5 400,00 €	ORS	SR	postup mimo zákon o VO §1 ods. 79200000-6
13	Dodávka plynu	Dodávka plynu na rok 2026	12 mesiacov	december 25	10 000,00 €	ORS	SR	postup mimo zákon o VO §1 ods. 65200000-5
14	Upratovacie služby	Upratovacie služby na rok 2026	1	december 25	9 000,00 €	ORS	SR	postup mimo zákon o VO §1 ods. 90910000-9

Source: oznamovatelia.sk

The Office demonstrates somewhat poorer practice in the area of publishing contracts. Although these can be found in the Central Register of Contracts, a random check of ten published contracts led us to conclude that approximately one quarter of them are published by the Office in a format that does not allow for machine searchability.

This seemingly minor fact, however, significantly complicates analytical work, which requires fast and automated access to information.

**Zmluva o poskytovaní služieb
kybernetickej bezpečnosti č. 20240409001**

uzatvorená podľa ustanovenia § 269 ods. 2 zákona č. 513/1991 Zb. Obchodný zákonník v znení neskorších predpisov za primeraného použitia zákona č. 69/2018 Z. z. o kybernetickej bezpečnosti a o zmene a doplnení niektorých zákonov v znení neskorších predpisov (ďalej len „zmluva“)

Objednávateľ:

Obchodné meno: Úrad na ochranu oznamovateľov
sídlo: Námestie slobody 29, 811 06 Bratislava
IČO: 53 621 948
DIČ: 2121473541
Bankové spojenie: Štátna pokladnica, Bratislava
IBAN: SK90 8180 0000 0070 0066 0123
zastúpený: Mgr. Zuzana Dlugošová, predsedníčka

Kontaktná osoba: Matej Uhlík, Daniel Demjén

Email: [REDACTED]

(ďalej aj len „Objednávateľ“)

a

Poskytovateľ:

Obchodné meno: **Binary Confidence s.r.o.**
sídlo: Špitálska 53, 81101 Bratislava
IČO: 47 754 346
zapísaný: v Obchodnom registri Mestského súdu Bratislava III,
oddiel: Sro, vložka číslo: 98806/B
IČ DPH: SK2024088638
Bankové spojenie: Fio banka, a. s., pobočka zahraničnej banky
IBAN: SK79 8330 0000 0029 0063 5940
zastúpený: Ján Andraško, konateľ
Kontaktná osoba: Pavol Draxler
Email: [REDACTED]

(ďalej aj len „Poskytovateľ“)

(Poskytovateľ a Objednávateľ ďalej spolu ai len „zmluvné strany“ alebo jednotlivo „zmluvná strana“)

Source: crz.sk

The Office to a significant extent publishes contracts without properly completed metadata, particularly in the section concerning the contractually agreed remuneration. This is often listed as 0, with an explanation provided only in the notes of the published document. In this way, however, the Office substantially complicates analytical work and the evaluation of data by machine-processing methods.

In assessing the Office's financial management, it can be noted that it also publishes its public procurement plan on its website, with the majority of procurements in 2024 consisting of small-scale contracts. Only one procurement reached the level of a below-threshold contract – the continuation of the building reconstruction, specifically the renovation of the building's cladding (as part of the RRP investment), with a total estimated value of €420,000.



Dátum účinnosti: 06.12.2024

Dátum platnosti do: neuvedený

Príloha

TEXT [Zmluva o dielo č. 19/24/S](#)
(.pdf, 542.1 kB)

Rezort: Úrad na ochranu oznamovateľov protispoločenskej činnosti

Objednáva tel: Úrad na ochranu oznamovateľov
Námestie slobody 29, 811 06 Bratislava

IČO: 53621948

Dodávateľ: LIFTSTAV s.r.o.
Závodná 3, 821 06 Bratislava

IČO: 31385851

Názov zmluvy: Zmluva o dielo č. 19/24/S

ID zmluvy: 10127582

Poznámka: Cena prác podľa tejto zmluvy: 50,00 EUR bez DPH/mesiac

Zverejnil: [Úrad na ochranu oznamovateľov](#)

Cenové plnenie

Zmluvne dohodnutá čiastka: 0,00 €	Celková čiastka: 0,00 €
-----------------------------------	--

SÚD Slovakia alebo Technickej inšpekcie SR (podľa vyhl. č. 508/2009 Z.z.),

c) odstraňovanie nedostatkov zistených pri revíziách a skúškach výťahov,

d) iné práce na objednávkach - napríklad výkon dielenských a stredných opráv vrátane dodania potrebných dielov, projektné práce, prevedenie modernizácie výťahu.

Č. III
CENA DIELA

Cena prác podľa tejto zmluvy bola stanovená dohodou zmluvných strán, v zmysle zákona NR SR č. 18/1996 Z.z. o cenách v znení neskorších predpisov a vyhlášky MF SR č. 87/1996 Z.z., ktorou sa vykonáva zákon o cenách, za jeden kalendárny mesiac podľa nasledovného rozpisu:

P.č.	Objekt - výťah	Cena v EUR bez DPH
1	Námestie slobody 29 - výťah LC Maxi 350 / 5 st.	40,00
2	Námestie slobody 29 - Online monitoring výťahu.	10,00
CENA SPOLU V EUR BEZ DPH		50,00

Suma slovom v EUR bez DPH: päťdesiat

Výška sadzby DPH bude uplatnená podľa platných predpisov v dobe vzniku daňovej povinnosti.

Zmluva o dielo č. 19/24/S - str. 2

a) Táto cena zahŕňa:

- údržbu výťahov podľa Čl. II, bod 1. tejto zmluvy, vrátane ceny drobného a spotrebného materiálu potrebného na výkon pravidelnej údržby,
- dopravné náklady súvisiace s údržbou výťahov podľa Čl. II, bod 1. tejto zmluvy,
- voliteľnú doplnkovú službu „Online monitoring výťahu“, ktorá je spoplatnená sumou 10,00 Eur bez DPH mesačne pre 1 výťah podľa rozpisu. Túto službu je možné zrušiť vždy k 31.03. daného kalendárneho roka.

b) Táto cena nezahŕňa prácu a materiál použitý:

- pri opravách porúch spôsobených neodbornou manipuláciou alebo úmyselným poškodením výťahového zariadenia zo strany dopravcovských osôb alebo nezaškolení osobami

Source: crz.sk

The Office's website also contains annual reports, which are again available in both Slovak and English versions.

[www.oznamovateliask/o-nas/dokumenty/fungovanie-uradu/vyroczne-spravy/](#)



O nás Naše činnosti FAQ Aktuality

EN

[Hlavná stránka](#) » [O nás](#) » [Dokumenty](#) » [Fungovanie úradu](#) » [Výročné správy](#)

Výročné správy

2024	Výročná správa o činnosti ÚOO za rok 2024 [.pdf, 2 MB] Whistleblower Protection Office Annual Report 2024 [.pdf, 2 MB]
2023	Výročná správa o činnosti ÚOO za rok 2023 [.pdf, 1 MB] Whistleblower Protection Office Annual Report 2023 [.pdf, 1 MB]
2022	Výročná správa o činnosti ÚOO za rok 2022 [.pdf, 1 MB] Whistleblower Protection Office Annual Report 2022 [.pdf, 1 MB]
2021	Výročná správa o činnosti ÚOO za rok 2021 [.pdf, 4 MB]

Source: oznamovateliask

We consider the publication of decisions to be very important, since the Office also fulfils the role of an administrative authority and holds other decision-making powers. A positive aspect is that the decisions are published in a clear and chronological manner, with the option of machine-searchable data.

The first published decision dates from 2023, with three more following a year later. In 2025 (by August), the Office had issued five decisions.

Case Study – The Right of Access to Information from the Office

We also tested the Office's compliance in the area of citizens' access to information. On 18 February 2025, we submitted a request to the Office for access to information under the Freedom of Information Act.

The request was part of a larger research package in which we evaluated the formal independence of 28 state institutions. The questions were therefore formulated uniformly for all entities.

First of all, it should be emphasized that the response to the request was delivered within the statutory period – six days from the date of submission.

- a) In our request, we asked the following questions:
In the last five years, have there been any changes in the position of the head of the Office?
- b) What was the total gross income of the head of the Office in 2024 (including salary, bonuses, lump-sum allowances, and other financial benefits related to the performance of the function or work activity)?
- c) What was the total gross income in 2024 of the Office's senior management at the second and third levels – i.e., the deputy chair and the directors of the Office's departments?
- d) What was the average gross monthly salary of the Office's employees in 2024?

The Office provided us with answers to all the requested information:

On the first point, it stated that in the last five years there had been no changes in the position of the head of the Office (the Chairwoman).

On the second point, it stated that the total gross income of the Chairwoman of the Office in 2024 amounted to €73,999.09 (including salary, bonuses, lump-sum allowances, and other financial benefits).

On the third point, it provided the following data in a table:

Gross income of the senior management of the Office (2nd and 3rd level of management) in 2024

Matej Uhlík (Deputy Chair): €52,841.27

Nikola Jaborníková (Director of Department): €42,640.68

Mária Hunková (Director of Department): €41,490.38

Total: €136,972.33

On the fourth point, it stated that the average gross monthly salary of the Office's employees in 2024 was €2,025 (excluding the Chairwoman), or €1,955 (excluding the Chairwoman and Deputy Chair).

From this, it can be concluded that the Office provided the data within the statutory period, with the required quality and in sufficient scope. The case study therefore confirmed a positive trend in communication with the Office, including the handling of formal requests.

4. INSTITUTIONAL INDEPENDENCE

In July 2024, Transparency International Slovakia conducted a formal assessment of the independence of institutions in Slovakia. The conclusions of this activity are largely relevant for evaluating the functioning and independence of the Office as well.

First of all, however, it should be emphasized that the assessment focused on the formal aspect of the issue – namely, to what extent the institution is structured to be independent. The established criteria do not take into account the actual behaviour of the institution's representatives nor its real independence in practical application.

The Office scored a total of 27.1 points out of 37.3, i.e., 73%, ranking seventh among the institutions evaluated. The evaluation criteria were divided into five categories:

1. appointment and status of the head of the Office,
2. possibilities for dismissing the head of the Office,
3. sovereignty and constitutional anchoring in the Constitution of the Slovak Republic or in a constitutional law,
4. salaries,
5. selection procedure for the position of the highest-ranking official of the Office.

The most critical issue proved to be the sovereignty of the Office, which has no constitutional or legal entrenchment and whose existence can be abolished by amending an ordinary law. Another problematic aspect is that the Office is a budgetary organization and its budget proposal is submitted as part of the chapter *"General Treasury Administration."* The approved budget of the Office can be reduced during the calendar year only by the National Council of the Slovak Republic. This underscores the Office's budgetary dependence, as its financing is not based on multiple sources.

The issue of salaries also proved problematic, as compared to the other institutions assessed, the Office showed a low level of average salaries in all monitored areas. This poses a risk to the institutional independence of the Office.

On the other hand, a positive aspect is the high threshold for dismissing the head of the Office, as well as the method of establishing the statutory body. The public hearing and open process in the creation of the Office and in the election of its first Chairwoman represented a groundbreaking example even for other state institutions.

The case highlighted fundamental shortcomings in the practical application of the law. On the one hand, it showed that the whistleblower protection mechanism is functional – the prosecutor can grant status, and the Office has the competence

to sanction non-compliance with the law. On the other hand, the ministry's conduct demonstrated that even public institutions may fail to respect legal rules, thereby undermining public trust in the system itself. The system of protected whistleblowers thus failed to prevent the retaliatory measure itself, even though the fine was paid by the ministry. Ultimately, this shows the limits of sanctions when it comes to state bodies, where in practice this only results in transfers between budgetary items. From the perspective of application, sanction mechanisms therefore appear insufficient, especially in politically sensitive cases – which are, in fact, the most crucial for the system of protected whistleblowing.

The *Čurillovci* case became highly publicized and politicized. This brought increased attention to the issue of whistleblower protection, but at the same time created space for its questioning. Part of the public perceived the status of protected whistleblowers as a necessary tool to shield police investigators from pressure and intimidation, while others interpreted it as a politically motivated step.

Our aim in this section is not to evaluate whether these police officers should or should not have been granted protection and the status of protected whistleblowers. What we consider essential is to assess the overall impact of the case on testing the independence and authority of the Office, as well as the functionality of the protected whistleblowing system.

Since the governing coalition even expressed an interest in amending the Whistleblower Protection Act in connection with this case, another dimension of the fragility of protected whistleblowing was revealed. Although the amendment proposal was eventually withdrawn by its sponsor, the signal to the public was clear.

As trust in the system is the cornerstone of protected whistleblowing, we believe that despite the efforts of the Office, this test ultimately ended in failure.

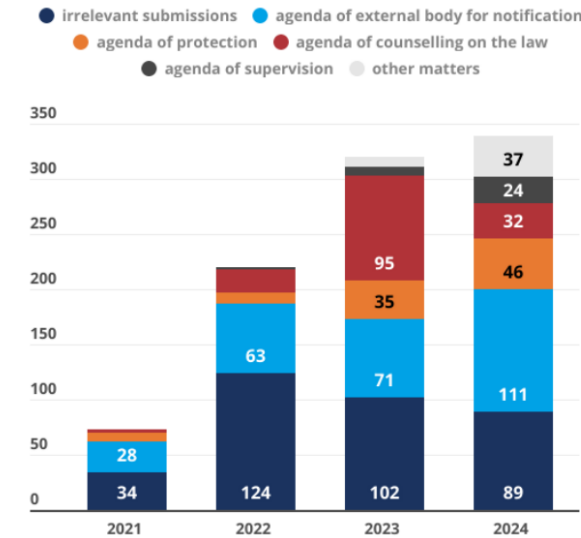
6. RESULTS OF THE OFFICE FOR THE PROTECTION OF WHISTLEBLOWERS IN NUMBERS

In the following sections of the assessment, we focus on quantitative indicators, applying a structure divided according to the individual powers and tasks of the Office. The main sources of data were the Office's annual reports for the years 2021–2024, as well as personal experiences and interviews with stakeholders who have cooperated with the Office.

a) Reports

In 2024, the Office for the Protection of Whistleblowers recorded a slight year-on-year decrease in the number of individuals who contacted it – most often through the hotline. A total of 404 people sought assistance, of which 282 cases fell within the Office's competence. By contrast, the agenda of the Legal Department slightly increased, due to more frequent requests from institutions for cooperation as well as a rise in the number of court proceedings in which the Office was involved. In total, 339 case files were created in 2024.

NUMBER OF CASE FILES OF THE OFFICE SINCE ITS ESTABLISHMENT



Source: Annual Report of the Office for 2024

The largest share of this agenda consisted of files falling under the competence of the external reporting authority. These included both open cases (11%) and so-called presumed reports (22%) – submissions that at first assessment appeared to be potential reports meeting the legal criteria. These then underwent more detailed examination, during which actual reports were identified. The external authority's agenda also

included submissions outside the Office's competence, which accounted for 26%. A smaller share of the agenda consisted of files relating to protection, legal advice, and supervision.

In 2024, the Office recorded 32 submissions concerning retaliation by employers, including 15 requests for the suspension of an employment-related action. Twelve of these cases were assessed as justified, while in the remaining cases the Legal Department concluded that no retaliatory measures had occurred. The most common forms of retaliation reported by whistleblowers included reassignment of duties, relocation of the workplace, reduction of salary, or changes in working hours, as well as dismissal, suspension from duties, or removal from office.

POČET OZNAMOVATEĽOV, KTORÍ ZÍSKALI OCHRANU

na základe kvalifikovaných oznámení, ktorým bola udelená ochrana prokuratúrou alebo iným správnym orgánom.



13

POČET KONTROL

začatých v danom kalendárnom roku.

POČET ŽIADOSTÍ O POZASTAVENIE ÚČINNOSTI PRACOVNOPRÁVNEHO ÚKONU ZAMESTNÁVATEĽA

Pozastavenia negatívnych pracovnoprávných úkonov vykonaných voči oznamovateľom v súvislosti s ich podanými oznámeniami.



■ počet žiadostí ■ počet pozastavení

32

POČET ODVETNÝCH OPATRENÍ

– podnetov na úrad, v ktorých oznamovatelia žiadajú o pomoc pri odvetných opatreniach a žiadostí o pozastavenie účinnosti pracovnoprávneho úkonu.

POČET ŽIADOSTÍ O SÚHLAS S PRACOVNOPRÁVNÝM ÚKONOM ZAMESTNÁVATEĽA

– ak chce takýto úkon zamestnávateľ uskutočniť voči chránenému oznamovateľovi.



■ počet žiadostí ■ počet neudelených súhlasov

186

POČET KONANÍ ÚRADU

súvisiacich s ochranou oznamovateľov, kontrolnou činnosťou, s udelením pokuty, alebo priestupku, udelením odmeny, ako aj pomoc oznamovateľom pri odvetných opatreniach a oznámeniach a iné.

*Všetky údaje za rok 2021 zahŕňajú iba obdobie september – december 2021

Source: Annual Report of the Office for the Year 2024

In 2024, a total of 29 new protected whistleblower statuses were granted. The vast majority – 78% – were issued by prosecutors, while labour inspectorates decided on 22%.

The year 2024 showed that employers sought to carry out employment-related actions against individuals who had obtained protected whistleblower status. In the reporting year, the Office recorded ten requests for consent to an employment action, with long-term data showing that, on average, one in five protected whistleblowers faces a situation in which their employer plans to take such an action. Most cases concerned planned termination of employment.

Of the ten requests, the Office granted consent in two cases; in the others, consent was not granted. Added to this were discontinued proceedings due to the Office's lack of jurisdiction or the expiration of whistleblower protection status. In 2024, the Office also received 15 requests to suspend the effect of an employment

action – that is, requests from employees who believed that the employment action taken against them was a retaliatory measure. The Office upheld eight of these requests. It is worth noting that in the previous year, 2023, there were eleven more such requests.

Applicants also contacted the Office via the hotline, online form, by mail, or in person. In 2024, this included 404 people, of which 166 by phone. Compared to 2023, this was a decrease of 54 calls. The Office explained this decline by citing increased employer interest in the amendment to the law in 2023, and it was likely also influenced by an awareness campaign.

During the reporting period of 2024, the Office did not grant any financial rewards.

In 2024, the Office received a total of 180 submissions from citizens. Among them were 17 relating to retaliatory measures and 74 relating to other unlawful conduct under Act No. 54/2019 Coll. These also included anonymous submissions – the Office recorded 55, of which only 5, after review, turned out to be reports meeting the legal requirements. Anonymous whistleblowers thus accounted for 24%.

From a practical perspective, it can be pointed out that in some cases the Office does not demonstrate a sufficient degree of proactive engagement – a fact confirmed in personal interviews with several stakeholders who had approached the Office.

On resource efficiency:

RoBudget Classification	Approved (EUR)	Adjusted (EUR)	Spent (EUR)	Balance (EUR)
610 Wages	719 865	719 865	690 893,06	28 971,94
620 Insurance	240 674	266 529	266 220,08	308,92
630 Goods and Services	329 031	325 618,3	321 221,77	4 396,53
640 Current Transfers	35 000	12 557,7	1 158,47	11 399,23
700 Capital Expenditures	100 000	100 000	99 992,16	7,84
Total	1 424 570	1 424 570	1 379 485,54	45 084,46

Source: Annual Report of the Office for 2024

b) Supervisory Activity

Undoubtedly, one of the important activities of the Office is also the exercise of its supervisory authority. From the organizational structure of the Office, it follows that the Supervision Department is an independent unit under the Legal Department, which reports directly to the Chairwoman.

Given the scope of obliged entities that must fulfil obligations in the area of internal reporting and other supervisory duties, it is understandable that the Office's staffing capacities may not always be sufficient.

According to the Office's annual report, in 2024 a total of 13 inspections were initiated, with two fines imposed for identified deficiencies – one in the amount of €7,000 and the other in the amount of €2,000. Another six cases are still under review by the Office.

Data provided by the Office indicate that the inspections focused mainly on public institutions and their ability to comply with obligations concerning internal reporting systems. The Office also stated that inspections were carried out on the basis of citizen submissions.

c) Analytical Activity

From the perspective of analytical and data activities, it is necessary to highlight the openness and innovativeness that the Office has brought into this area. First of all, it is very encouraging that the Office seeks to combine behavioural experiments with awareness-raising activities, particularly those aimed at young people.

We also positively evaluate the accessibility of data, which can be quickly found on the website oznamovatelia.sk. Especially at a time when other public institutions are cutting analytical positions, a data-driven approach to examining the issue is particularly welcome.

In this area, public opinion surveys carried out and evaluated by the Office should also be highlighted. These focus not only on the recognizability of its brand and general public awareness of whistleblowing, but also on the willingness to report anti-social conduct.

However, it should be noted that the data show a relatively slow growth in Slovak citizens' awareness of the Office's existence. According to the 2024 annual report of the Office for the Protection of Whistleblowers, only 39% of respondents in a representative survey knew of this institution's existence. Although the figures show a year-on-year increase of about 9%, they cannot be considered a truly positive outcome. The context must be taken into account – during the reporting period, there was an intensive media campaign and several high-profile cases that brought the Office unusually high attention. Under such circumstances, a significantly higher increase in awareness of the Office could have been expected.

The low level of awareness despite broad media coverage suggests that the Office still lacks a case that would connect it positively to the public consciousness. At the same time, it confirms that the issue of whistleblower protection is not yet sufficiently established in Slovakia and may be too complex for an average citizen to grasp. Awareness of the existence of an institution tasked with protecting whistleblowers from retaliation should, however, be a fundamental prerequisite for the effective functioning of the whistleblowing system.

In addition to the analytical methods mentioned above, in 2024 the Office also carried out quantitative research focused on collecting the experiences of chief auditors with reporting in local government. This issue is very important, as confirmed by the findings of Transparency International Slovakia. The main reason is the fact that Slovak local government is extremely fragmented, with up to one-third of municipalities having auditors who do not work exclusively for a single municipality. A comprehensive study in this area was also published in 2024 by the Supreme Audit Office of the Slovak Republic.

Under these conditions, it is to be expected that whistleblowing is not a central concern of municipalities and that the fulfilment of related duties may often be only formalistic.

d) Training

In 2024, the Office for the Protection of Whistleblowers signed a memorandum of cooperation with the Association of Chief Auditors, which resulted in the implementation of two joint training sessions – in Košice and Trenčín. A total of 101 auditors participated. For this group, the Office also prepared a special methodological guideline tailored to the specifics of their role, which is available on the Office's website. In addition, the Office organized six further in-person training sessions for responsible persons from both the public and private sectors. These were attended by 232 participants; four took place in Bratislava, one in Banská Bystrica, and one in Poprad.

In total, in 2024 the Office organized 13 training sessions, attended by 557 people. This can be considered a slight decline compared to previous years, when the Office was more active in the field of training. For example, in 2023 it trained 616 civil servants, and in 2022 as many as 1,137 employees (from both the public and private sectors).

Since 2024, the Office has also offered the possibility of e-learning, which is available free of charge upon registration. Registration is simple and requires only basic personal data and the applicant's email address. The interface is user-friendly, but the format is rather monotonous. E-learning also requires a certain degree of interactivity, for example in the form of responses to quiz questions.

e) Raising Awareness of the Issue

One of the most fundamental problems in making whistleblower protection more effective in Slovakia is the persistently low level of public awareness of this issue. Key data from before the establishment of the Office show that, when asked whether there was a law protecting whistleblowers, only 39% of respondents answered "yes." As we have already noted, when asked a similar question about the existence of the Office, these figures remained essentially unchanged between 2019 and 2024.

A 2020 survey further shows that fewer than 10% of respondents understood the issue of whistleblowing. Despite the many years invested in raising awareness of this topic, its recognition among the general public remains very low.

Media visibility

Undoubtedly, raising awareness also involves activity on social media and participation in media outputs.

Data collected by Transparency International Slovakia show that the Office is most active on social networks such as Instagram, Facebook, LinkedIn, as well as through a podcast. The Office set up accounts on all these platforms already in 2021, with the most significant increase in followers observed on Facebook.

The Office has been particularly active on Instagram, where since the beginning of its operation it has published 609 posts (as of 25 August 2025), which translates to roughly one post every other day, or four posts per week.

From the demonstrated data, it is clear that on a quantitative level the Office is fulfilling its role – it is making the issue of whistleblower protection highly visible through social media.

However, the cost of such awareness-raising activities must also be factored into this equation.

Advertising on social media cost the Office €15,000, while according to available data from Meta, the Office usually sponsors its posts with amounts below €100. On average, it thus boosts around 100 posts per year (excluding data from 2021).

Much more substantial investments, however, were made by the Office in 2022, when it drew primarily from Recovery Plan funds. At that time, the campaign *“Silence is not golden”* was launched, aimed at reaching the economically active population.

In total, the Office purchased media space worth €400,000, with one quarter of the costs going to online media, and the remainder to television and billboard advertising in regional cities.

The result of this relatively large-scale campaign was an increase in awareness of the Office from 12% to 23%, i.e., by approximately 11 percentage points. Monthly traffic to the Office’s website also increased – from the original 776 monthly visitors to approximately 6,700 people.

DEVELOPMENT OF THE NUMBER OF THE OFFICE’S FOLLOWERS ON INDIVIDUAL SOCIAL MEDIA PLATFORMS

Social Media Platform	2024	2023	2022	2021
Facebook	8700	8000	6000	600
Instagram	1800	1500	1100	260
Linkedin	1000	700	no data available	no data available
Media (Mentions)	1198	2788	508	211
Podcast	4 episodes 1800 subscribers	6 episodes 1660 subscribers	4 episodes	



Source: Social Media of the Office for the Protection of Whistleblowers, August 2025

COMPARISON OF THE NUMBER OF SOCIAL MEDIA FOLLOWERS OF THE OFFICE AND SELECTED INSTITUTIONS

Institution	Facebook	Instagram	LinkedIn
Confederation of Trade Unions	26 000	429	31
Public Defender of Rights (Ombudsperson)	18 000	7614	731
Public Procurement Office	1 300	472	1000
Ministry of Interior	95 000	6800	2000
Police of the Slovak Republic	593 000	278 000	-
Government Office	55 000	10 600	2000
Antimonopoly Office	127	636	2000
Supreme Court of the Slovak Republic	615	-	2000
Supreme Audit Office	7 300	1222	1000
Constitutional Court	3 000	982	1039
ÚOO	8 700	1847	1000

Social media of the ÚOO and selected institutions, August 2025



f) Cooperation with Third Parties

As we have already pointed out in the section devoted to the powers and mission of the Office, the law itself explicitly states among the Office's missions the development of cooperation with the Slovak National Centre for Human Rights and with non-governmental organizations in matters of whistleblower protection. Last but not least, the law also envisages cooperation with similar institutions and organizations within the EU and beyond.

At this point, it is appropriate to highlight the purpose of this provision. The legislator undoubtedly took into account the fact that the existence of an independent whistleblower protection office is extremely rare across EU countries. This is precisely why the Office is tasked with cooperating with a wide variety of institutions entrusted with whistleblower protection abroad – primarily to transfer good practices to Slovakia, but also in the opposite direction.

Developing cooperation with the non-profit sector aims to establish whistleblower protection in Slovakia both formally and informally, and as broadly as possible. Since before the establishment of the Office, this agenda was carried out almost exclusively by the non-profit sector, it is particularly important that the know-how and implemented activities remain as coordinated as possible.

The Office has taken this role seriously since its inception, as confirmed by its practical cooperation with Transparency. Illustratively, one can point to the results of 2024, when the Office sought to strengthen relations with both domestic and international partners.

It therefore participated in several public events, such as Pucung, Pohoda, ***“Report or not report”***, or the public discussion organized by Transparency International Slovakia on whistleblowing and trade unions.

From the collected experience and informal conversations between Transparency and representatives of other relevant NGOs, it also follows that the Office’s communication is open – including its willingness to provide data or participate in personal meetings.

Domestically, significant cooperation also took place with the Office of the Government Plenipotentiary for the Development of Civil Society. Linking with this entity opens the way for greater involvement of the non-profit sector and civic initiatives, although the real impacts are not yet clearly tangible. The report also points out the need for more systematic evaluation of whether these partnerships strengthen public trust and whether cooperation translates into concrete changes in practice. However, some activities of the Government Plenipotentiary’s Office have had a very negative impact on whistleblower protection, as they undermine the credibility of the NGO sector.

At the international level, the Office continued its involvement in the NEIWA network, which brings together European institutions focused on whistleblower protection. Thanks to this, Slovakia has access to an exchange of experience and good practices. However, the fact remains that the actual applicability of these insights domestically depends on political will and the willingness to adapt recommendations to Slovak conditions. Especially in 2023 and 2024, this has proven rather illusory.

It is also worth mentioning the establishment of contacts with the Latvian anti-corruption agency KNAB.

g) Sanctions

A landmark case was the repeatedly mentioned affair of the police officers referred to as the ***Čurillovci***, particularly in view of the highest fine imposed by the Office to date. For the retaliatory measure adopted by the Ministry of Interior of the Slovak Republic against protected whistleblowers without the consent of the Office, a fine of €90,000 was imposed.

This case strongly resonated within the media sphere, and notwithstanding the considerable pressure exerted upon the Office by the executive power, the Office was able to maintain its independent position. The justification for the sanction, imposed at the upper limit of the statutory range, was elaborated in decision no. UOO-164/2024 across more than thirty pages. The decision on the fine was also publicly communicated by the Chairwoman.

With respect to the issue of the precedence of legal provisions, the decision must be considered particularly significant in the part addressing the specific regime established under Act No. 54/2019 Coll. The Ministry’s argument rested primarily on the alleged inapplicability of its provisions to personnel orders pursuant to § 35 (1)(a) of Act No. 73/1998 Coll.

In this regard, the Office clearly emphasized that:

“From the moment protection is granted by an administrative authority pursuant to § 6 (1), or by a prosecutor pursuant to § 4 (1) of Act No. 54/2019 Coll., the service authority becomes obliged to act in relation to the protected whistleblower within the regime defined under § 7 (1) of Act No. 54/2019 Coll. According to this provision, a service authority may issue a decision in the service relationship concerning a protected

whistleblower solely with the consent of the Office. There are three exceptions to this rule with respect to persons in service under Act No. 73/1998 Coll.: the granting of consent by the protected whistleblower to the decision, the issuance of a decision conferring an entitlement, or the issuance of a decision in the service relationship connected with the termination of service resulting from a legal fact independent of the employer's assessment."

This conclusion was reaffirmed by the Office in its second-instance decision.

CONCLUSION

The four-year trajectory of the Office highlights several systemic paradoxes accompanying the issue of protected whistleblowing in Slovakia. On the one hand, it reflects a robustly established institutional foundation and the legislator's explicit intent to accord greater attention to this matter; on the other hand, it reveals complicated implementation in practical application.

This discrepancy began to manifest already with the delay in the proper establishment of the Office in 2019, and was fully underscored by the developments in 2023 and 2024 in connection with the so-called *Čurillovci* case. In this instance, the executive power undertook to ostracize both the Office and the very issue of protected whistleblowing; the possibility of a purpose-driven amendment to the Whistleblower Protection Act was also brought to the forefront. Although no legislative change was ultimately adopted—owing to pressure from the professional community, international institutions, and the European Commission—the negative signal conveyed to the public was unequivocal.

In the overall assessment of its activities to date, it can be stated that the Office has fulfilled its statutory obligations, has approached its mission responsibly, and has striven for a high degree of transparency. At the same time, however, there remains an absence of a breakthrough case that would significantly popularize the issue of whistleblowing in Slovakia and strengthen public confidence in its functionality.

Statistical indicators also suggest that public awareness of the legal framework and of the possibilities of using protected whistleblowing is not increasing with sufficient dynamism. Likewise, the system of financial rewards for active whistleblowers of misconduct has so far proved insufficiently functional.

In summary, it can be concluded that the primary mission of the Office—to transform the normatively robust framework of whistleblower protection into an effectively functioning system in applied practice—has so far been only partially achieved.

Transparency International Slovakia

Bajkalská 25
Bratislava 821 01
tis@transparency.sk



Co-funded by
the European Union



TRANSPARENCY
INTERNATIONAL
SLOVENSKO