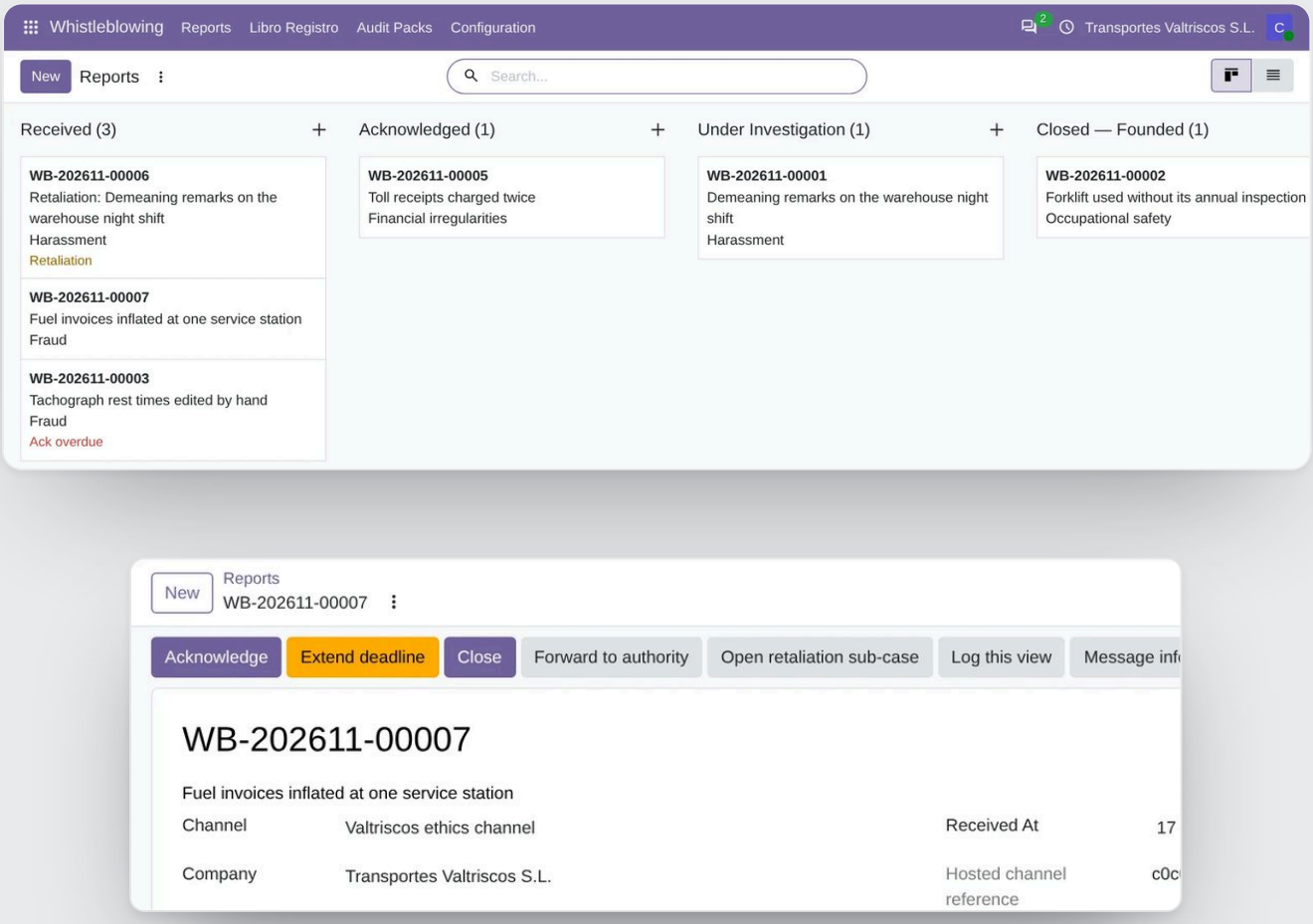
USER MANUAL · COMPLIANCE AND REGULATION

Whistleblowing for Odoo

For those who already have the module: install it, activate it, set it up and use it, step by step.

Module version 20.0.1.3.12 | Odoo 20 screenshots | Edition of 18-11-2026



Real Odoo 20 screenshot. The board of reports by status and the detail view of a report received through the hosted page.

Contents

On the right, the page where each section starts. Menu and button names are those of Odoo in English.

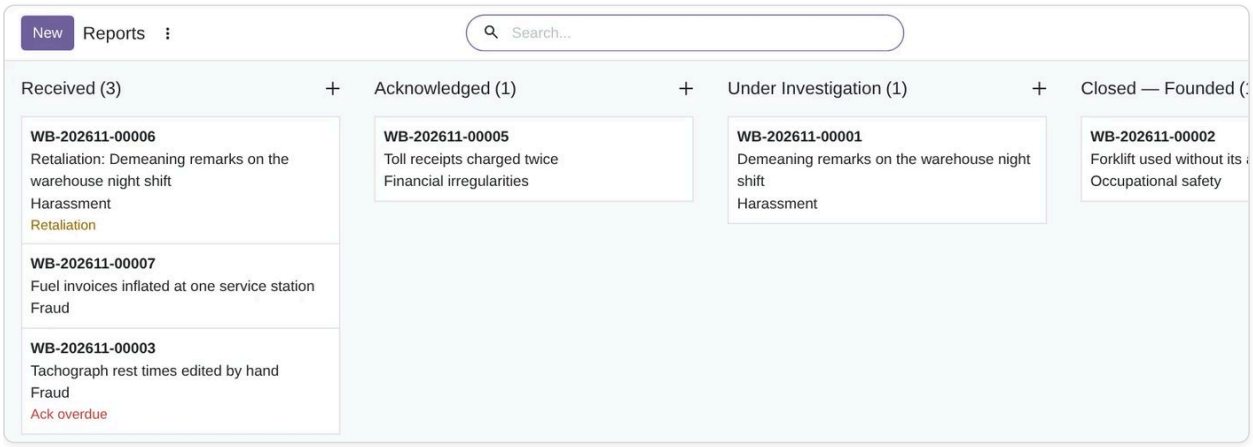
1	What it is and where it lives	3
2	Before you start	4
3	Installation	4
4	Activate FlexigoTech Cloud: the 14-day trial	5
5	Getting it running	7
6	The module's options	9
7	Activate the page for reporters	10
8	Handling a report from start to finish	13
9	Monitoring deadlines and extending one	15
10	Writing to the reporter and requesting information	16
11	Granting access to a case	17
12	Closing a report	19
13	Verifying the logbook and generating the audit pack	21
14	Retention and access requests	23
15	What happens automatically	25
16	If something fails	25
17	Support	26

This manual describes version 20.0.1.3.12 of the module (Odoo branch 20.0, commit d70a9f16f). Everything it says comes from its code: menus, buttons, fields, scheduled actions and error messages.

The screenshots come from a test Odoo 20 database, with a made-up company and data and no real connection to FlexigoTech Cloud. In Odoo 17, 18 and 19 the module has its own version: if something on your screen does not match, write to us.

1 What it is and where it lives

The module brings the company's whistleblowing channel into Odoo: the reports that arrive through the FlexigoTech Cloud hosted page, their deadlines, the thread with the reporter, the register book and retention.



- **Real Odoo 20 screenshot.** The **Reports** board, with the sample reports grouped by status.

Everything hangs off the **Whistleblowing** menu. Almost all of its screens appear in English in every language, Spanish included, and they are written here exactly as you will see them.

Whistleblowing › Reports	The reports, as a board by status and as a list. The System Manager and the investigators see them; investigators only see the reports they are assigned to.
Whistleblowing › Libro Registro	The register book under Spanish Law 2/2023 art. 26, with a button to verify its chain. The System Manager, the data protection officer and the external auditor can see it.
Whistleblowing › Audit Packs	The audit packs already generated and, within it, **Whistleblowing › Audit Packs › Generate Audit Pack** to create a new one. The Responsable and the data protection officer can see them; only the Responsable can generate one.
Whistleblowing › Configuration	**Whistleblowing › Configuration › Channels**, **Whistleblowing › Configuration › Categories**, **Whistleblowing › Configuration › Responsables**, **Whistleblowing › Configuration › Policy documents**, **Whistleblowing › Configuration › Privacy notices**, **Whistleblowing › Configuration › DPIA artefacts**, **Whistleblowing › Configuration › External authorities**, **Whistleblowing › Configuration › Retention policies**, **Whistleblowing › Configuration › Import batches**, **Whistleblowing › Configuration › Import legacy reports** and **Whistleblowing › Configuration › GDPR DSAR Assembly**. The Responsable and the Data Protection Officer can see them; the two import ones are visible only to the Responsable.

Outside its menu, the module comes with seven scheduled tasks, which collect the reports from the hosted page, watch the deadlines, apply retention and expire case permissions, and a **Whistleblowing** section in the Odoo settings. Reports arrive through the FlexigoTech Cloud hosted page, which is activated from the channel.

2 Before you start

Several of these things are prepared outside Odoo, before you install the module.

- Odoo 17, 18, 19 or 20, on Odoo.sh or on your own server. It does not work on Odoo Online, which does not allow installing third-party modules.
- Your Odoo must open over https: without it, the channel cannot be published.
- The Website app. The module installs it if you do not have it.
- Who will be the System Manager: a person with an Odoo user or a collegiate body. It is appointed by the management body (Law 2/2023 art. 8.1 and 8.2).
- Who will act as investigator and who as data protection officer.
- The text of the channel policy and the text of the privacy notice.
- An https address where you publish your legal texts for whoever reports, and an email address to receive deadline alerts.
- A FlexigoTech Cloud subscription or its 14-day trial.

> What the module does not do for you. It does not notify the Independent Authority for the Protection of Whistleblowers (AAI) of the appointment or dismissal of the System Manager: the notification checkbox is ticked by hand once you have done it yourself. It does not send anything to any authority, the Public Prosecutor's Office included: referring a matter to an authority only records which one you referred it to. It does not investigate or decide: the System Manager classifies, investigates and closes each report with its outcome and measures. And it is not legal advice.

3 Installation

The module is installed like any third-party Odoo module. You need an administrator.

How to get it

From its listing on Odoo Apps (**https://apps.odoo.com/apps/modules/20.0/flexigo_whistleblowing**) or from the module page on flexigotech.com. Choose the Odoo version you use: each version is a separate module.

The module depends on `flexigotech_cloud`, the connection to FlexigoTech Cloud. On Odoo Apps, the module page lists it under "Community Apps Dependencies" and its price already includes it; it is also free and has its own page (**https://apps.odoo.com/apps/modules/20.0/flexigotech_cloud**). Put the two folders together in the same module path and Odoo installs `flexigotech_cloud` at the same time.

On Odoo.sh

1. **Upload the folders to your repository**
   Copy `flexigo_whistleblowing` and `flexigotech_cloud` into your project branch, in your modules folder, and push.

2. **Wait for Odoo.sh to build the branch**

When it finishes, both modules are in the branch.

3 **Install the app**

In **Apps**, click **Update Apps List** (with developer mode on), search for "Whistleblowing for Odoo" and click **Activate**.

On your own server

1 **Copy the folders**

Place `flexigo_whistleblowing` and `flexigotech_cloud` in a folder that is in your Odoo `addons_path`.

2 **Restart Odoo**

This lets it read the new modules.

3 **Install the app**

In **Apps**, **Update Apps List**, search for "Whistleblowing for Odoo" and click **Activate**.

> When you install it, Odoo also installs the apps the module depends on: Website, Discuss and Calendar. If you already use them, nothing you have changes.

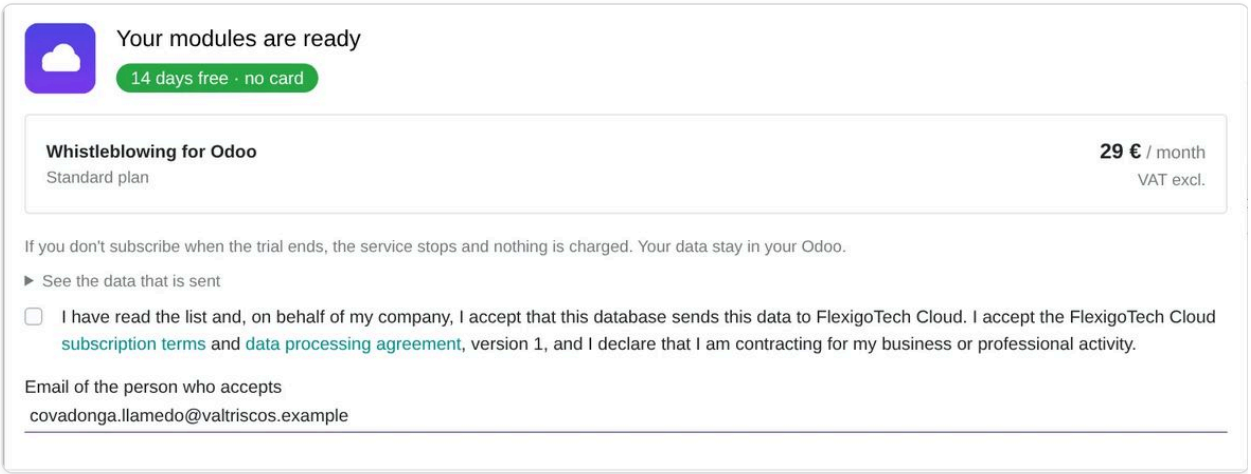
USER MANUAL · WHISTLEBLOWING

4 Activate FlexigoTech Cloud: the 14-day trial

The hosted page where reporters send their reports is a FlexigoTech Cloud service. Until the database is connected and the module has a trial or subscription, you cannot activate that page, and without it a new installation has no address for reporters.

1 **Click Activate in the top bar**

It appears as soon as you install the module. It opens the **Activate FlexigoTech Cloud** window, with the Standard plan and its 14 free days, no card required.



- **Real Odoo 20 screenshot.** The activation window: read the list of data, tick the box and enter your email.

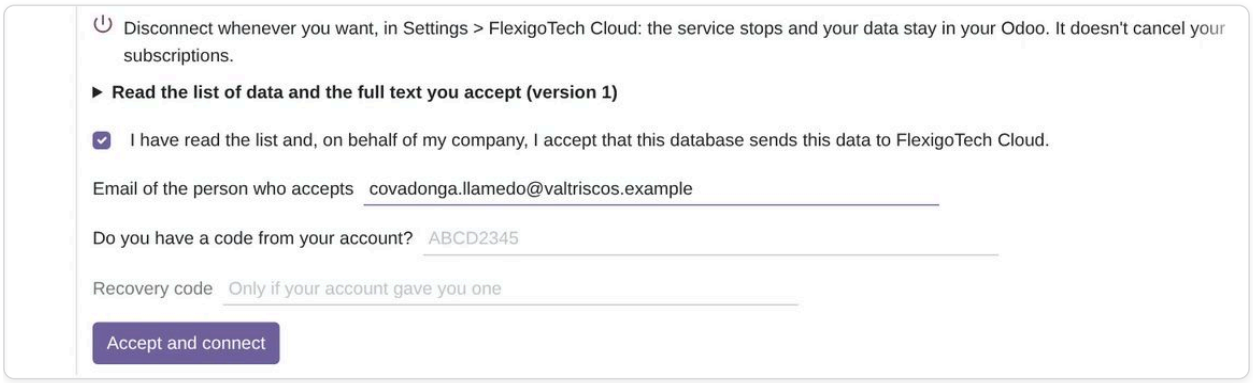
2 **Accept and enter your email**

Tick "I have read the list and, on behalf of my company..." (it includes the subscription terms and the data processing agreement) and enter the **Email of the person who accepts**.

3. **Click Connect and start the trial**
   Odoo registers the database with FlexigoTech Cloud and the module trial begins. If you leave it for later, **Later** closes the window.

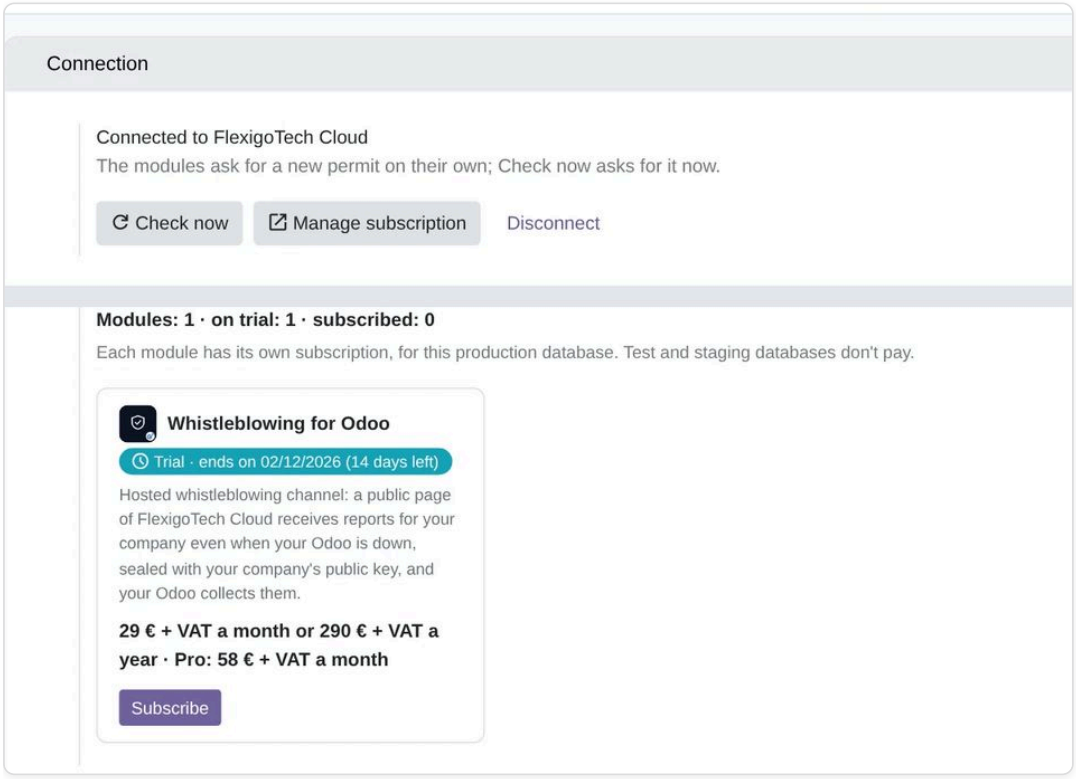
The same, from Settings

In **Settings › FlexigoTech Cloud** you will find the full list of what the database sends. Tick the box, enter the email and click **Accept and connect**. If you already have an account at app.flexigotech.com, the **Do you have a code from your account?** field links the database to it (the code is valid for 10 minutes).



- **Real Odoo 20 screenshot.** Settings › FlexigoTech Cloud, before connecting: the ticked box, the email and **Accept and connect**.

Once the database is connected, the **Modules** block shows each module with its status: **On trial** and the date it ends, **Subscribed**, and so on. From there you choose the plan (Standard or Pro, monthly or yearly) and click **Subscribe**: payment is made on the Stripe page, outside Odoo.



- **Real Odoo 20 screenshot.** Settings › FlexigoTech Cloud with the database connected and the module on trial.

PLAN	PRICE	INCLUDES
Standard	€29 a month or €290 a year	Support reply within 1 business day
Pro	€58 a month or €580 a year	Reply within 4 business hours and a video call if needed

Prices exclude VAT. If you do not subscribe when the trial ends, the service stops and nothing is charged; your data stays in your Odoo. **Check now** requests the permission immediately (otherwise the module renews it by itself every 6 hours).

> A trial cannot be started on a neutralised copy (staging) or on a database with demo data: Settings says so with "This database is a neutralised copy or has demo data, so trials can't be started here.".

USER MANUAL · WHISTLEBLOWING

5 Getting it running

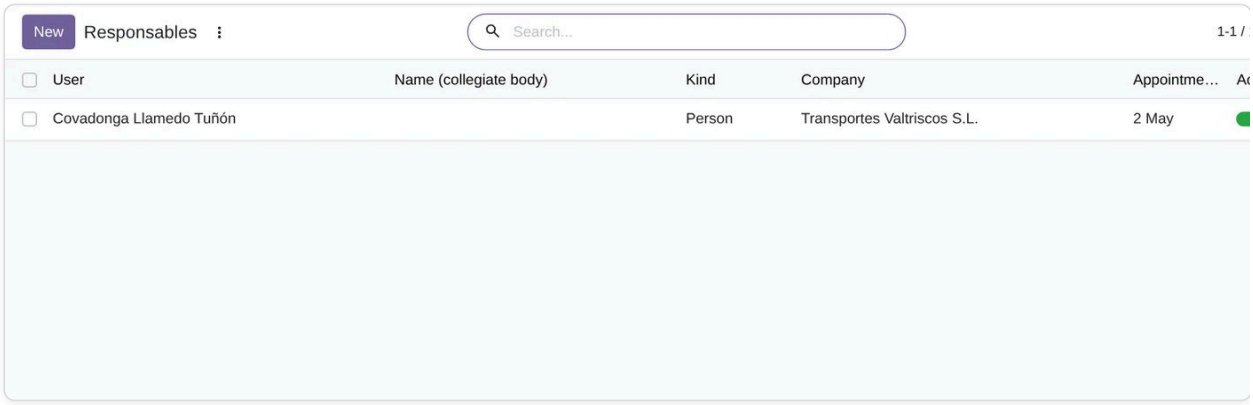
This is done once, after starting the FlexigoTech Cloud trial.

1 **Give yourself the System Manager group**

On installation, the module gives none of its groups to anyone, not even the administrator: until someone has one, nobody sees the **Whistleblowing** menu and its lists give an access error. An administrator opens the user record of whoever is going to be the Responsable del Sistema (it can be you) and gives them the **Whistleblowing / Responsable del Sistema** group. That group includes those of investigator, data protection officer, external auditor and Board dashboard.

2 **Create the System Manager**

Go to **Whistleblowing › Configuration › Responsables** and click **New**. In **Kind** you choose the type: a person carries their user in **User** and a collegiate body, its name in **Name (collegiate body)**. The appointment date goes in **Appointment Date** and cannot be in the future. In the **AAI notification** group you attach the designation document and, once you have notified the appointment to the Autoridad Independiente de Protección del Informante, you tick **Notified To Aai** yourself and enter its date. There can only be one active Responsable per company. On saving, their user also receives the group from the previous step.



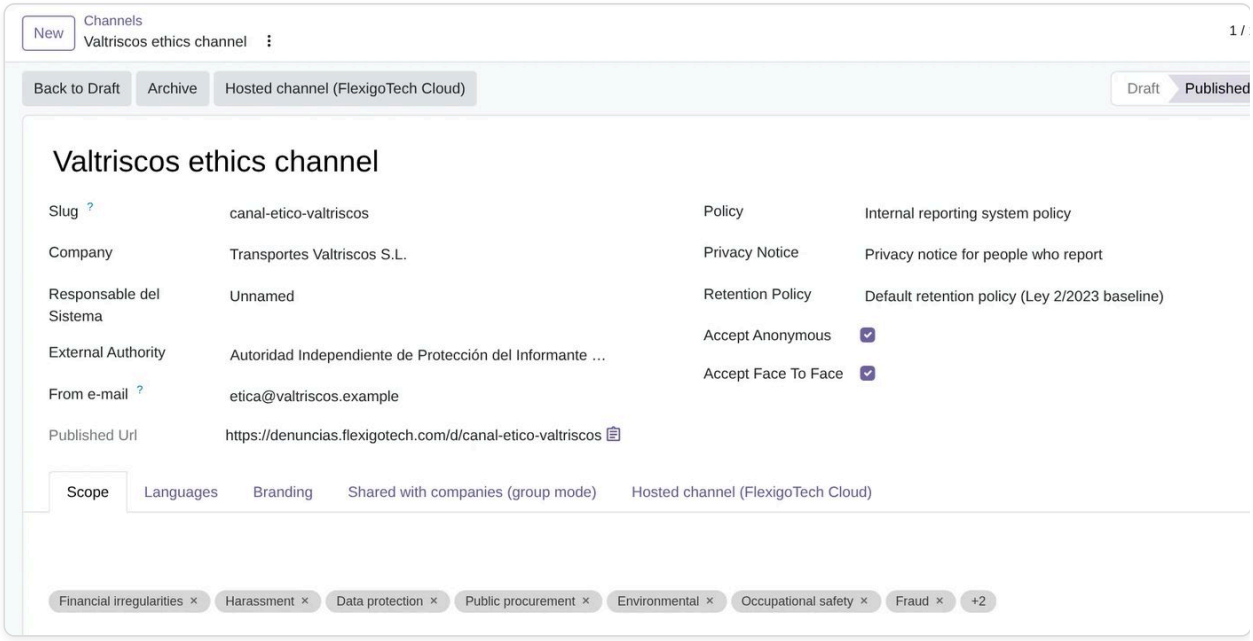
- **Real Odoo 20 screenshot.** The **Responsables** list with the System Manager of the sample company.

3 **Create the policy and the privacy notice**

Write the channel policy in **Whistleblowing › Configuration › Policy documents** and the privacy notice in **Whistleblowing › Configuration › Privacy notices**. The channel needs both in order to be published.

4 Create the channel and publish it

Go to **Whistleblowing › Configuration › Channels** and click **New**. Enter the channel name and its identifier in **Slug**, and choose the **Responsable del Sistema**, the **Policy**, the **Privacy Notice** and the **External Authority**. In the tabs you choose the **Languages** and, in **Scope**, the **Accepted Categories**: these are the languages and categories that the channel passes to the hosted page. Then click **Publish**. To publish you need the Responsable, the policy, the privacy notice and your Odoo address starting with https. In a company in Spain, **Accept Anonymous** cannot be removed (Ley 2/2023 art. 7.3).



- **Real Odoo 20 screenshot.** The sample channel, with the **Hosted channel (FlexigoTech Cloud)** button at the top and the address of its hosted page in **Published Url**.

5 Activate the hosted page

On the channel, click **Hosted channel (FlexigoTech Cloud)**; only administrators can see it. The wizard explains what is sent to FlexigoTech Cloud before sending anything. Fill in **Page address** (3 to 40 lowercase letters, digits or hyphens), **Legal texts address (https)** and **Email for deadline alerts**, and if you wish **Your other reporting channels**. Tick the acceptance box and click **Activate the hosted channel**. A database has only one active hosted channel: activating it on one channel turns off the others.

6 Give the address to your staff

With the page active, **Published Url** shows its address, on denuncias.flexigotech.com. This is the one reporters will use: put it where your staff will find it.

7 Give the groups to others

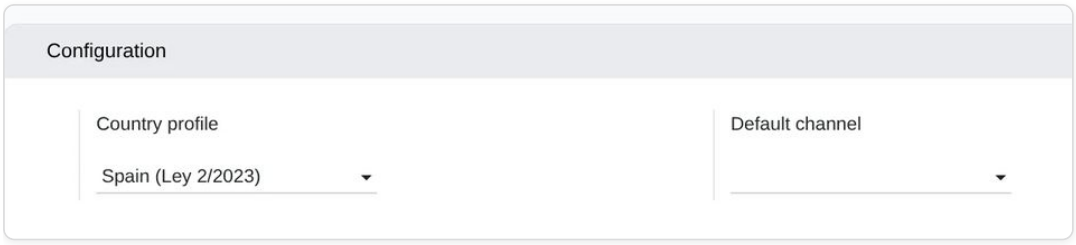
Give each person their group on their user record: **Whistleblowing / Investigator** to whoever investigates, **Whistleblowing / Data Protection Officer** to the data protection officer and **Whistleblowing / External auditor** to the auditor. HR and Legal are handled through per-case permissions: this is explained in "Giving access to a case".

Once activated, the hosted page already receives reports. Your Odoo collects them automatically every 10 minutes, through the scheduled action **Whistleblowing: hosted channel (FlexigoTech Cloud)**, and stores their

text and the reporter's details encrypted. Two other scheduled actions watch the deadlines: **Whistleblowing: recompute overdue flags**, every 15 minutes, and **Whistleblowing: deadline reminders**, every hour.

6 The module's options

What can be adjusted is spread across Odoo's settings, the channel and the retention policy.



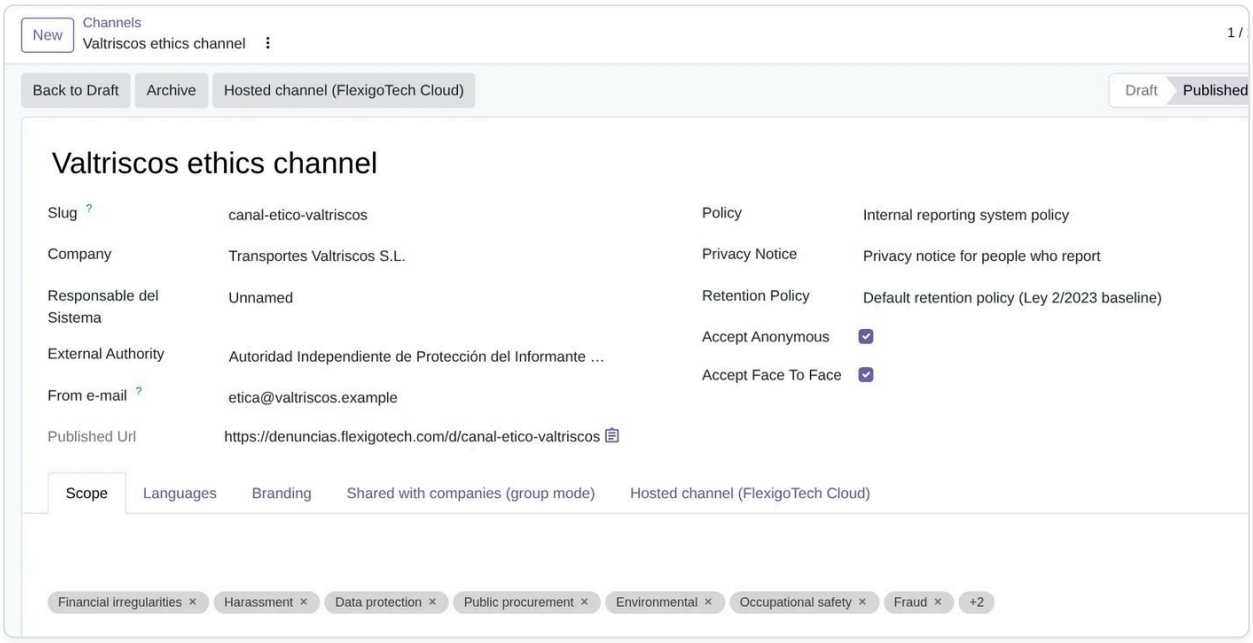
- **Real Odoo 20 screenshot.** The **Whistleblowing** section of the settings, with its **Configuration** block.

OPTION	DEFAULT	WHAT IT DOES
Country profile (settings)	**Spain (Ley 2/2023)**	It only changes the start point of the response deadline: with the Spanish profile, from receipt; with any other, from acknowledgement of receipt. No profile applies another country's law.
Default channel (settings)	Empty	Today it changes nothing: no part of the module uses it.
Anti-virus scanning (settings)	Off	With the box ticked and ClamAV installed on your Odoo server, attachments are scanned for viruses. Otherwise they remain unscanned.
Accept Anonymous (channel)	On	Accepts anonymous reports. In a company in Spain it cannot be turned off (Law 2/2023 art. 7.3).
Languages (channel)	Empty	The languages the channel passes to the hosted page. If you choose none, the language of whoever activates it is used.
Accepted Categories (channel)	Empty	The infringement categories that the channel passes on to the hosted page. They are maintained in **Whistleblowing › Configuration › Categories**.
Not Pursued Purge Days (retention policy)	90	Days from closure after which reports closed as inadmissible or unfounded are purged. Accepts from 1 to 90.
Libro Registro Retention Years (retention policy)	10	Years from closure after which the reporter's data is erased, and years after which entries in the register book are anonymised. Accepts from 1 to 10.
Dry Run (retention policy)	Off	Test mode: the retention task counts what it would delete and deletes nothing.

The acknowledgement and response deadlines are not adjusted: they are 7 days and 3 months (Spanish Law 2/2023 arts. 9.2.c and 9.2.d). The extension is requested once per report, and the new date cannot fall more than 6 months after receipt. Days and months are calendar days and months, with no public holidays excluded.

7 Activate the page for reporters

The channel is set up in Odoo. The public page where reporters submit their reports is provided by FlexigoTech Cloud.



- **Real Odoo 20 screenshot.** The channel with its buttons, the published address and the tabs.

The channel

Go to **Whistleblowing › Configuration › Channels**. Each channel has a name, an identifier in Odoo (**Slug**) and the company it belongs to. The other details on the form:

Responsable del Sistema	The person or body that manages the reports for this channel.
Languages and **Accepted Categories**	The languages of the channel and the infringement categories it accepts.
Policy and **Privacy Notice**	The channel policy and the privacy notice shown to the person reporting.
External Authority	The external authority to which a referral is directed.
Accept Anonymous	Whether the channel accepts anonymous reports. In a company in Spain it cannot be removed (Ley 2/2023 art. 7.3): on saving, the warning "Anonymous reporting is mandatory in Spain (Ley 2/2023 art. 7.3); cannot be disabled for a Spanish company channel." appears.
Published Url	The address for reporters. On a new installation it is the hosted page's address, and there is none until you activate it.

Tabs and states

The channel has the tabs **Scope**, **Languages**, **Branding**, **Shared with companies (group mode)** and the hosted channel tab. Its state is **Draft**, **Published** or **Archived**. The buttons change according to the state:

Publish	Shown only in draft. Moves the channel to published.

Back to Draft	Shown when the channel is not in draft. Returns it to draft.
Archive	Shown while the channel is not archived. Archives it.

To publish, the channel needs a Responsable del Sistema, a policy and a privacy notice, and the Odoo address (the one Odoo has stored as the web address) must start with https. If something is missing, Odoo says so in an English message: "Cannot publish a channel without a Responsable.", "Cannot publish a channel without a Policy.", "Cannot publish a channel without a Privacy Notice." or "Whistleblowing channels require HTTPS. The current web.base.url (...) is plain HTTP. Configure TLS before publishing.".

Activating the hosted page

The hosted page is a public page of FlexigoTech Cloud, at denuncias.flexigotech.com/d/ followed by the page address. It receives reports even if your Odoo is down. Without it, a new installation has no address for reporters.

1. **Open the wizard**
   On the channel, press **Hosted channel (FlexigoTech Cloud)**. Only administrators can see it. The wizard explains what is sent to FlexigoTech Cloud before sending anything.

2. **Fill in the details**
   Page address (3 to 40 lowercase letters, digits or hyphens; the wizard suggests the channel identifier), **Legal texts address (https)** and **Email for deadline alerts** are mandatory. The email is pre-filled with that of the Responsable's user or, if they have none, with the company's email. **Your other reporting channels** is optional.

3. **Accept**
   Tick the acceptance box, which is given on behalf of your company. If you do not tick it, the message "Tick the box to accept before activating the hosted channel." appears and nothing is activated.

4. **Press Activate the hosted channel**
   If FlexigoTech Cloud accepts the registration, the channel becomes active and stores the version of the text accepted, who accepted it and when. If not, Odoo says why; for example, "That page address belongs to another company: choose another one.".

The **Hosted channel (FlexigoTech Cloud)** tab of the channel shows **Hosted channel active**, **Hosted page** (the page address), **Hosted page address**, **Legal texts address (https)**, **Email for deadline alerts** and **Other reporting channels**, and on the right **Accepted text version**, **Accepted DPA version**, **Accepted by** and **Accepted on**.

> A database has only one active hosted channel: if you activate the page on one channel, it is switched off on the others, including those of other companies. The page does not store the IP address of the person reporting, either in the application or in its server log.

What the reporter sees

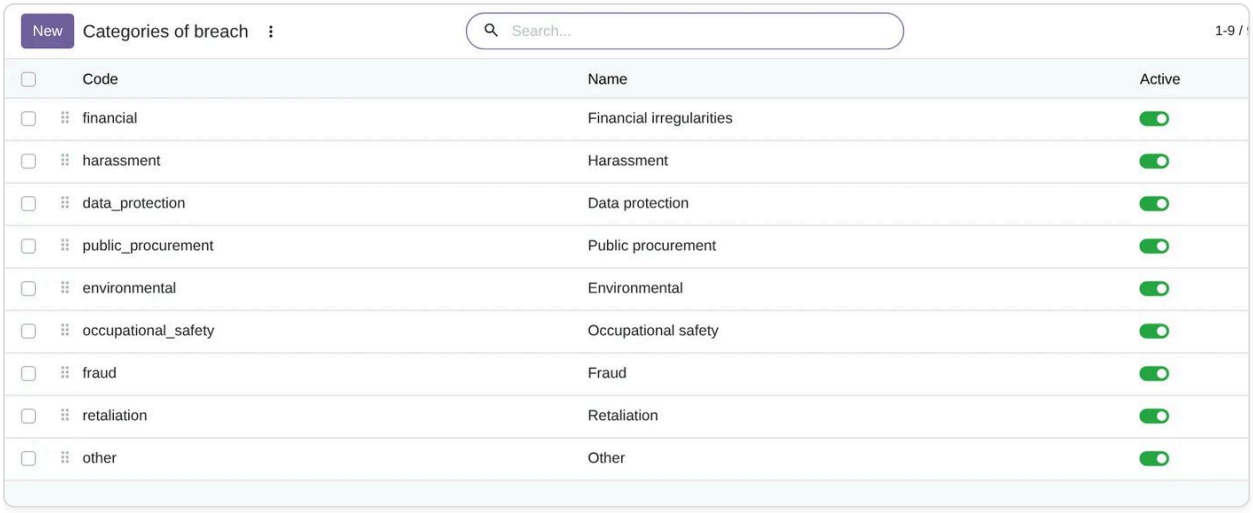
- The page asks for the category, the subject and the text of the report.
- The reporter chooses between reporting anonymously or with a name and email.
- Up to 10 attachments can be uploaded.

- On submission, the page shows a 26-character tracking code once, which the reporter does not choose. With that code they return, read the company's messages and reply with messages and attachments.
- The page can appear in Spanish, English, Catalan, Portuguese, French or German. It shows the language of the person opening it if the channel has it in **Languages**; otherwise the first of those six that the channel has, or English. There is no Italian, Dutch or Polish.

Where the reports come from

Reports arrive sealed at FlexigoTech Cloud. The scheduled task **Whistleblowing: hosted channel (FlexigoTech Cloud)** runs every 10 minutes in your Odoo: it collects what has been received, stores the text and the reporter's details encrypted, sends the reporter what the company has written to them, and reads the deadlines of each hosted report.

The categories



Real Odoo 20 screenshot. The 9 categories that come with the module, in **Categories of breach**.

The module installs 9 categories, in **Whistleblowing › Configuration › Categories**. Each one has **Code**, **Name** and **Active**.

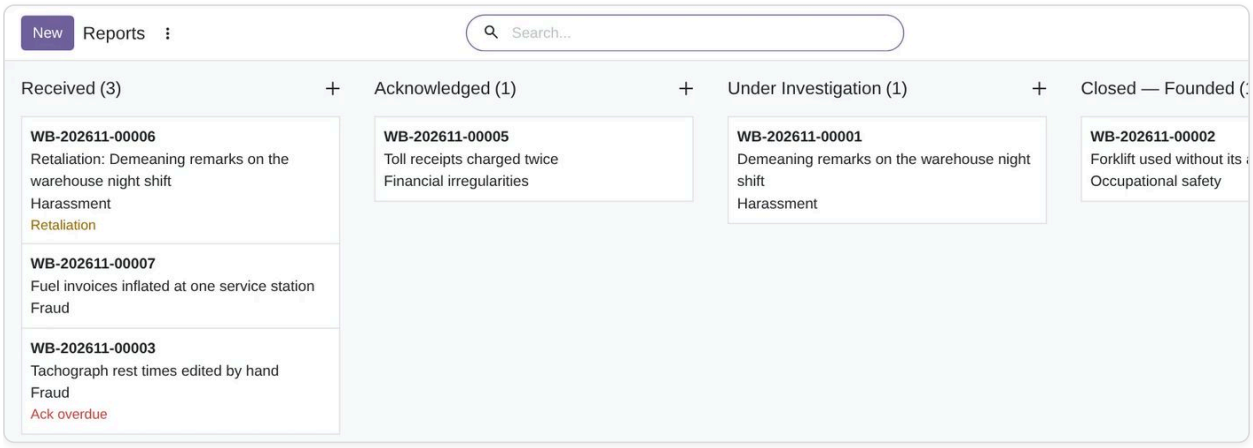
CODE	NAME
financial	Financial irregularities
harassment	Harassment
data_protection	Data protection
public_procurement	Public procurement
environmental	Environmental
occupational_safety	Occupational safety
fraud	Fraud
retaliation	Retaliation
other	Other

> Until an administrator gives a user the **Whistleblowing / Responsable del Sistema** group, nobody sees the **Whistleblowing** menu and its lists show an access error. The text of a received report cannot be changed by hand either: it only comes in through the hosted page.

8 Handling a report from start to finish

Each report arrives in **Whistleblowing › Reports** and moves forward with the buttons in its header, from acknowledgement to investigation.

Whistleblowing › Reports opens the reports in a board by state; there is also a list view. On opening, the **Open** filter is already applied, so closed reports do not appear until you remove it. In the list, reports with an overdue deadline appear in red; on the board, their card says **Ack overdue** or **Closure overdue**. In the search there are filters for **Open**, **Closed**, **Overdue acknowledgement**, **Overdue closure** and **Retaliation**, and groupings by **State**, **Category** and **Priority**.

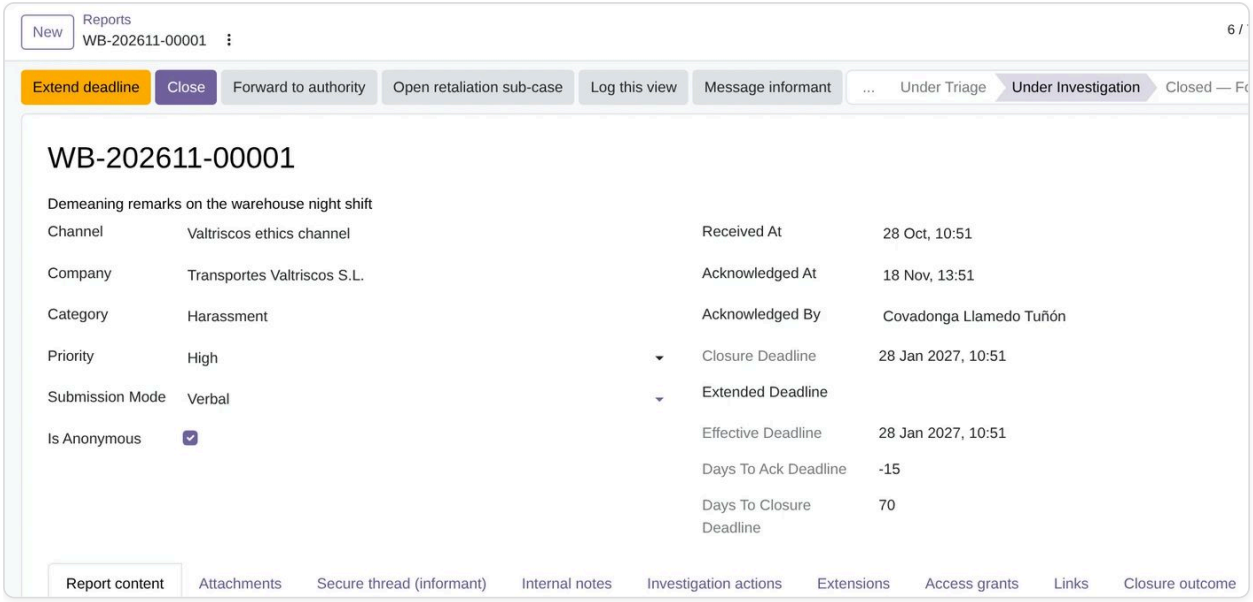


- **Real Odoo 20 screenshot.** The reports board with the reports grouped by state.

Reports from the hosted page are collected only by the task **Whistleblowing: hosted channel (FlexigoTech Cloud)**, every 10 minutes. The report stores its reference from the hosted channel in **Hosted channel reference** and the date calculated by FlexigoTech Cloud in **Answer deadline (hosted channel)**. On creation, the module records the event and the entry in the register book.

The form

At the top appear the report's details: **Channel**, **Company**, **Category**, **Priority** (**Normal**, **High** or **Retaliation**), **Submission Mode** (**Web form**, **Verbal** or **Face to face**) and **Is Anonymous**. On the right are the dates: **Received At**, **Acknowledged At** and the deadlines. Below there are tabs for the content, the attachments, the secure thread with the reporter, the internal notes, the investigation actions, the extensions, the case permissions, the links, the closure, the events, the access log and the meetings.



- **Real Odoo 20 screenshot.** A report under investigation with its buttons and tabs.

Acknowledge	Acknowledges receipt: records who and when, leaves a message for the reporter, adds the entry to the register book and, if the reporter gave their email, sends them a notice. Only shown with the report in **Received**.
Triage	Moves it to **Under Triage**. Only shown with the report in **Acknowledged**.
Start investigation	Moves it to **Under Investigation**. Shown in **Acknowledged** and in **Under Triage**.
Message informant	Writes to the reporter through the secure thread. Only the Responsable del Sistema can see it.
Log this view	Records in the access log that you have read the content. Only the Responsable del Sistema can see it.

Investigators are assigned in **Assigned Investigators**, on the **Access grants** tab; each one sees only the reports they are on. Attachments are not encrypted: they are stored as Odoo attachments, with a limit of 25 MB per file and 100 MB per report. EXIF metadata is removed from images. They are only scanned for viruses if you enable **Anti-virus scanning** and your Odoo server has ClamAV; otherwise they remain unscanned.

> Once the report is closed, **Extend deadline** and **Close** disappear. The **Report content** tab, with the text and the identity of the reporter, is visible only to the System Responsable. The reporter, the report text and the assigned investigators can only be changed by the Responsable, or by an assigned investigator who is also an Odoo administrator.

9 Monitoring deadlines and extending one

The module calculates only the acknowledgement and response deadlines of each report, warns when they fall due, and records the extension when you request it.

How they are calculated

- Acknowledgement of receipt: 7 calendar days from receipt (Law 2/2023 art. 9.2.c; Directive (EU) 2019/1937 art. 9.1.b). **Days To Ack Deadline** counts the days remaining; if negative, the days that have passed.
- Response with the Spain country profile: 3 months from receipt, once acknowledgement has been given (Law 2/2023 art. 9.2.d).
- Response with any other profile: 3 months from acknowledgement (Directive (EU) 2019/1937 art. 9.1.f).
- Without acknowledgement, with any profile: 3 months from when the 7 days for acknowledgement expire (Law 2/2023 art. 9.2.d; Directive art. 9.1.f).
- Days and months are calendar days: public holidays and weekends are not deducted.

The response date appears in **Closure Deadline**. If there is an extension, the new date goes to **Extended Deadline**, and the one that counts is **Effective Deadline**. **Days To Closure Deadline** counts the days left while the report is open. Changing the country profile does not recalculate dates that are already set.

The warnings

- When a deadline passes, the report record shows a red warning at the top: "Acknowledgement deadline missed." or "Closure deadline missed (3-month / extended).". In the list, the row appears in red.
- The task **Whistleblowing: recompute overdue flags**, every 15 minutes, recalculates which reports have an overdue deadline. The filters **Overdue acknowledgement** and **Overdue closure** group them together.
- The task **Whistleblowing: deadline reminders**, every hour, creates one activity per report and overdue deadline on the channel record, for the user of its System Owner. The activity carries the reference and a link to the report, and is not repeated while the report stays open.
- For reports on the hosted channel, FlexigoTech Cloud also emails the channel's notification address on day 5 if there is no acknowledgement, and 14 days before the response deadline ends. The email includes the channel, the reference and the date, but nothing from the report itself.
- **Answer deadline (hosted channel)** shows the response date held by FlexigoTech Cloud. The cloud always counts from receipt: with a profile other than Spain, it may not match **Closure Deadline**.

Requesting an extension

1. **Click** Extend deadline

   It is in the report header as long as the report is not closed, purged or retained anonymised. The **Motivated Extension** wizard opens.

2. **Choose the new date**

   New Deadline is set to 6 months from receipt, the maximum the module accepts. You may enter an earlier date.

3. **Write the reason**

The reason goes in the **Justification (mandatory, min 30 chars)** group and needs at least 30 characters; otherwise Odoo warns with "Extension justification must be at least 30 characters (legal requirement).". It is stored encrypted.

4 **Click Apply Extension**

The date goes to **Extended Deadline**, and the extension is recorded in the **Extensions** tab, with who decided it and when. The logbook records an **Extended** entry, the reporter receives a message on the hosted page and, if they gave their email, an email notice.

> Only one extension is allowed per report: the second one gives "This report already has its motivated extension...". A date more than 6 months after receipt gives "Extension cannot push the deadline beyond 6 months from receipt (Ley 2/2023 art. 9.2.d).". Ley 2/2023 art. 9.2.d only allows an extension in cases of special complexity, for up to a further three months; deciding whether to extend is up to the Responsable.

10 Writing to the reporter and requesting information

From the report you can write to the reporter, ask for further details and read their replies, without leaving Odoo.

The law provides that communication with the reporter may be maintained and, where considered necessary, additional information may be requested from them (Law 2/2023 art. 9.2.e). The secure thread is where this is done in this module.

Where each piece of data comes from

Messages from the reporter and their attachments	They arrive through the scheduled task **Whistleblowing: hosted channel (FlexigoTech Cloud)**, which runs every 10 minutes and collects what the reporter has written on the hosted page.
Messages from the company	You write them from the report using **Message informant**, or the module sends them automatically when acknowledging receipt, extending the deadline and closing the report.

Record buttons

Message informant	Opens the wizard of the same name, with the **Body** field. With **Send**, the message is added to the thread and goes out to the hosted page; with **Cancel** it closes without sending anything. If you send it empty, Odoo shows "Reply body is required.". Only the System Owner can see it.

How each message travels

Each message to the reporter is sealed for them and goes out to FlexigoTech Cloud at the next collection. The **Hosted channel** column in the **Secure thread (informant)** tab shows its status: **Pending** while the cloud has not yet received it, **Sent** once it has accepted it, and **Not accepted** if it has rejected it. If the cloud does not respond,

it stays **Pending** and is retried at the next collection. The reporter reads it on the hosted page with their tracking code.

Meetings

The **Meetings** tab is only a list, with the date each meeting was requested and the date it took place. The hosted page does not offer requesting in-person meetings, the module does not book anything in the Odoo Calendar, and there is no screen for recording or transcribing a verbal communication.

> A verbal report cannot be typed in by hand in the module: text reports come in through the hosted page, and in a report created manually the subject and description of the facts are read-only.

USER MANUAL · WHISTLEBLOWING

11 Granting access to a case

What reports each user can see depends on their group, on whether they are assigned as an investigator, and on the per-case permissions.

Law 2/2023 art. 32.1 limits access to the system's personal data to a closed list, within each person's functions: the System Owner and whoever manages it directly, the head of human resources only where disciplinary measures may be taken, the head of legal services where legal measures are to be adopted, the data processors and the data protection officer. Directive (EU) 2019/1937 art. 16.1 requires that the identity of the reporting person not be disclosed without their consent to anyone other than authorised staff competent to receive or follow up reports. The module enforces this with user groups, assigned investigators and per-case permissions.

On installation, the module gives none of its groups to anyone, not even the administrator. Until an administrator gives a user the Responsable del Sistema group on their Odoo user record, nobody sees the **Whistleblowing** menu and opening its lists gives an access error. Creating the Responsable del Sistema record afterwards with a user also gives them that group.

The System Owner

It is created in **Whistleblowing › Configuration › Responsables**. It can be a person with an Odoo user or a collegiate body. Their designation and dismissal are decided by the entity's administrative or governing body (Ley 2/2023 art. 8.1); a collegiate body delegates the management of the system to one of its members (art. 8.2).

Kind	Person or collegiate body. A person needs a linked user; a collegiate body needs a name in **Name (collegiate body)**.
User	The person's Odoo user.
Appointment Date	Date of appointment. It cannot be in the future.
Revocation Date	Date of removal.
Notified To Aai, its date and Designation Attachment	In the group **AAI notification**: the checkbox and date of the notification, which the company ticks manually, and the designation document.
Revoke	Removes the System Owner: deactivates them, sets today's date in **Revocation Date** and removes the System Owner group from their user unless they are one in another company. The button is hidden when the record is no longer active.

> There can only be one active System Owner per company. The module does not notify the Independent Authority for the Protection of Whistleblowers of the appointment or removal. Law 2/2023 art. 8.3 requires notification within ten working days; the company does this itself and then ticks the checkbox.

Per-case permissions

Investigators see in **Whistleblowing › Reports** the reports in which the Responsable places them in **Assigned Investigators**, on the **Access grants** tab of the report. They do not see the text or the identity of the reporter: the **Report content** tab is visible only to the Responsable.

For HR and Legal there are per-case permissions. On the same tab, the Responsable adds a line with the user, their role in **Role Scope** (**HR Director** or **Legal counsel**) and, if wanted, an expiry date in **Expires At**; to remove it, the Responsable enters a date in **Revoked At**. The user also needs the group **Whistleblowing / HR Director (per-case)** or **Whistleblowing / Legal counsel (per-case)**. The permission does not include the content or the identity of the reporter, and the module does not give those two groups a menu. The other two roles in the list, **Investigator** and **DPO audit**, do not grant access on their own.

A daily task switches off expired permissions. A permission cannot be moved to another case or another user: it is revoked and a new one is given. Who granted it and when is recorded.

What is encrypted and what cannot be changed

The facts, the reporter's name and email, the outcome, the measures, the reason for the extension, the messages and the internal notes are stored encrypted (AES-GCM) with a key per company. Attachments are not encrypted: they are stored as Odoo attachments.

> If you change the company name after receiving reports, the reports already stored stop being readable: each company's key depends on its name. Do not change it. If you need to, write to comercial@flexigotech.com first and we will look at it with you.

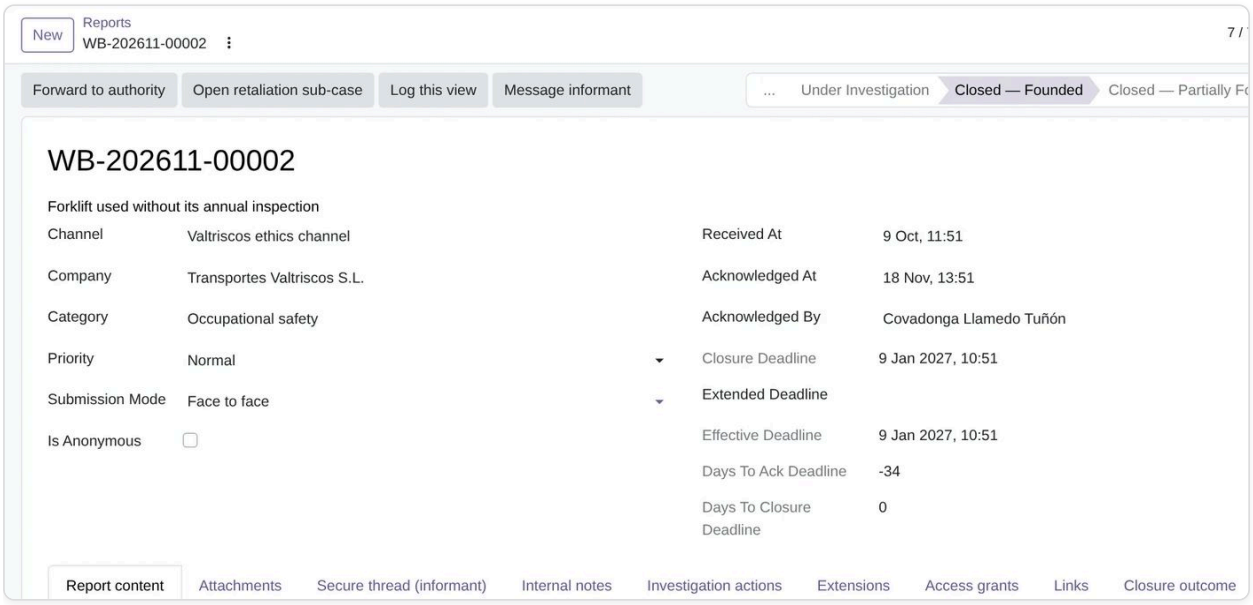
The access log and the lifecycle events only accept additions: they cannot be edited or deleted. Attempting it gives Odoo's responses "The access log is append-only and cannot be modified.", "The access log is append-only and cannot be deleted.", "Lifecycle events are append-only and cannot be modified." or "Lifecycle events are append-only and cannot be deleted."

Log this view, in the report header, records in the access log that you have read its content. The access log only records that and GDPR access requests: opening a report is not logged automatically.

> Neither investigators, HR nor Legal can see the identity of the reporter: the **Report content** tab is visible only to the System Responsable. The Data Protection Officer cannot see it either: their GDPR request assistant decrypts it to find the reports of the person requesting their data and, for reports already closed, includes it in the ZIP.

12 Closing a report

When closing a report you choose its outcome. You can also note that you are referring it to an authority or open a retaliation sub-report.



- **Real Odoo 20 screenshot.** A report already closed, with the **Forward to authority** and **Open retaliation sub-case** buttons still visible.

Closing with Close

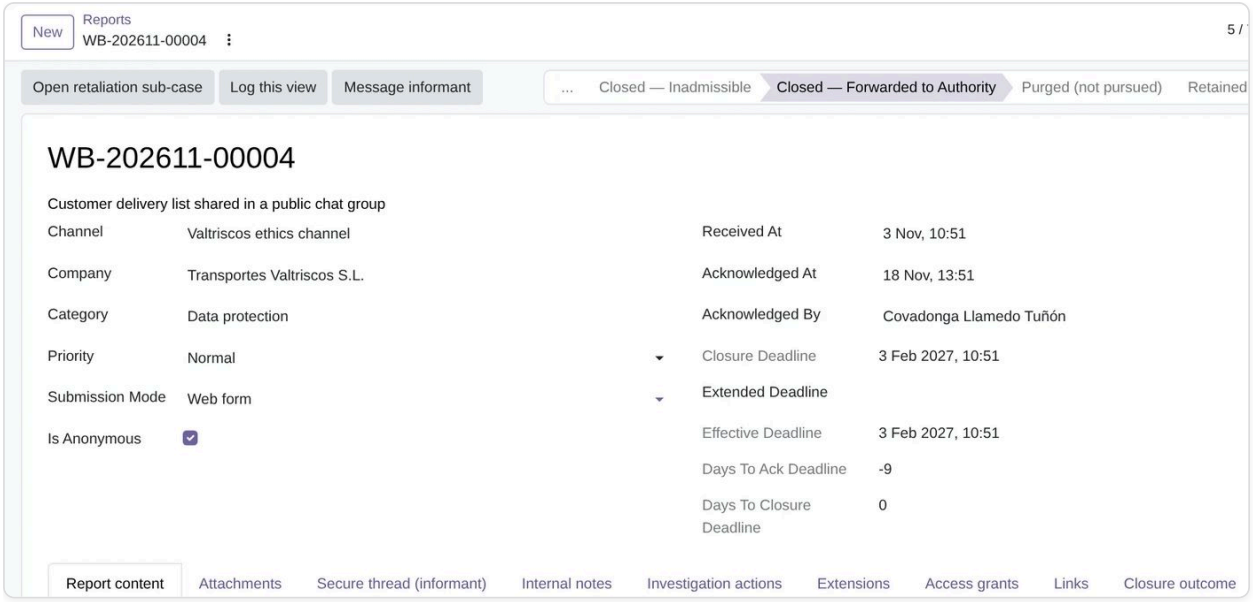
Click **Close** on the report and a wizard opens. The button is hidden when the report is already closed, purged or retained anonymised. In **Outcome State** you choose one of five outcomes: **Founded**, **Partially founded**, **Unfounded**, **Inadmissible** or **Forwarded to authority**. The default is **Unfounded**.

The wizard has two mandatory texts, those of the groups **Outcome** and **Measures summary**. Both are stored encrypted. If either is missing, Odoo warns "Outcome and measures summary are mandatory at closure." When the closure is applied, the reporter receives a message with the outcome on the hosted page, the logbook records an entry and, if the reporter gave their email, they receive a notice with the final status under its technical name (for example, closed_founded).

Apply Closure	Applies the chosen outcome and closes the report.
Cancel	Closes the wizard without changing the report.

Referring to an authority

Before clicking **Forward to authority**, choose the authority in **Forwarded To Authority**, in the **Closure outcome** tab of the report. Without an authority, Odoo responds "Select an external authority before forwarding." The button records the date, closes the report as forwarded and leaves the entry in the logbook; it does not write to the reporter. It is hidden on reports already forwarded, purged or retained anonymised.

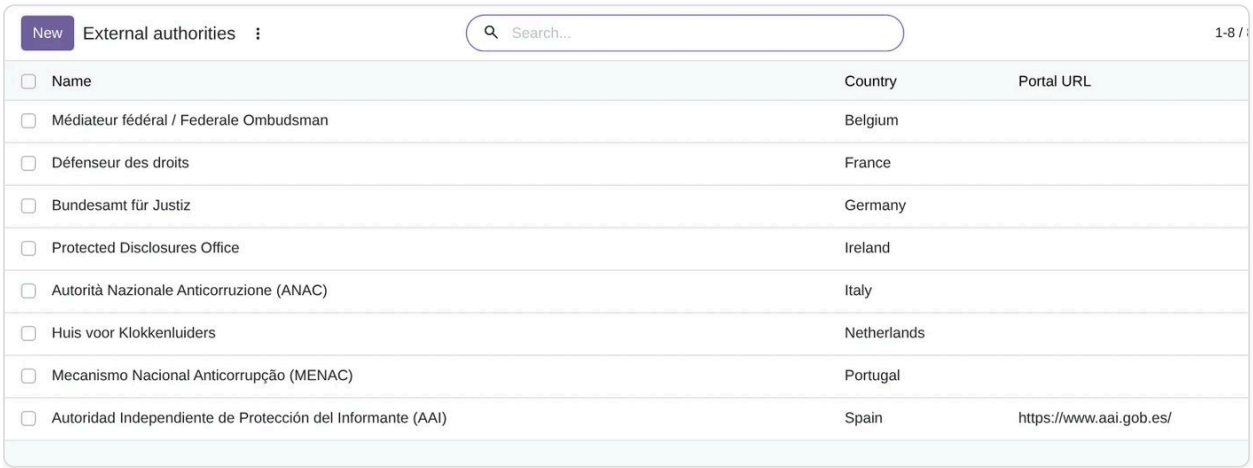


- **Real Odoo 20 screenshot.** A report closed as forwarded to the authority, with **Open retaliation sub-case** in the header.

> The module does not send anything to any authority. Sending is done by your company on its own. This includes the Public Prosecutor's Office, to which Law 2/2023 art. 9.2.j requires the immediate referral of facts that could indicatively constitute a crime.

External authorities

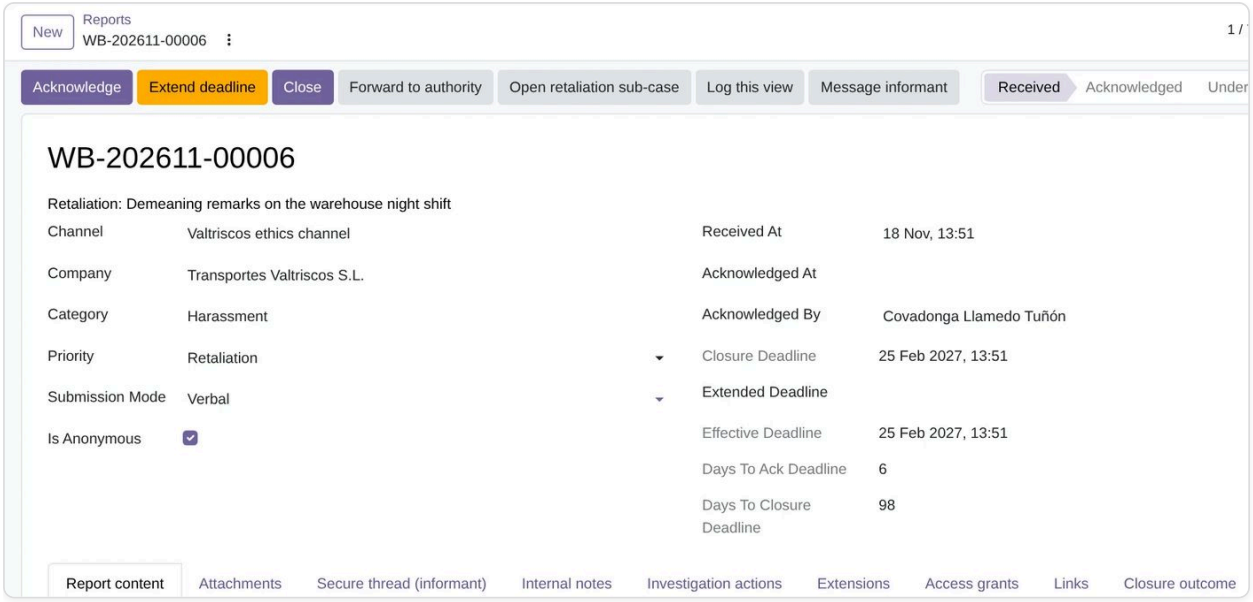
The module comes with 8 authorities, one per country profile: Spain, Portugal, France, Germany, Italy, Belgium, the Netherlands and Ireland. You can add others in **Whistleblowing › Configuration › External authorities**. For each one you record the name, the country and the address of its portal.



- **Real Odoo 20 screenshot.** The **External authorities** list with the 8 authorities the module includes.

Retaliation sub-report

Open retaliation sub-case creates a new report, in **Received**, with priority **Retaliation**, its own reference and the same content. Its subject starts with the word Retaliation, and the logbook records which report it comes from; the form does not show a link between the two. The button is visible in any state. Law 2/2023 art. 36.1 prohibits retaliation against anyone who submits a report.

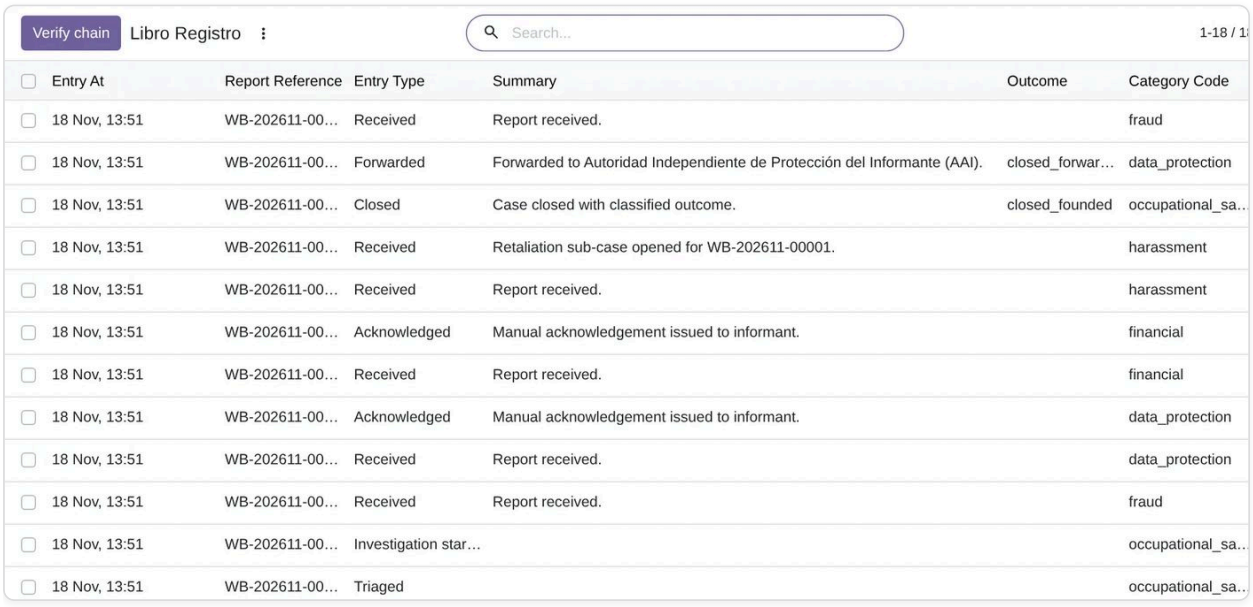


- **Real Odoo 20 screenshot.** The sub-report WB-202611-00006, with priority **Retaliation**.

USER MANUAL · WHISTLEBLOWING

13 Verifying the logbook and generating the audit pack

The logbook records each step of the reports in a chain of hashes that can be verified. The audit pack gathers it into a ZIP by period.



- **Real Odoo 20 screenshot.** The logbook list with the verify-chain button at the top.

The logbook

The menu is **Whistleblowing › Libro Registro**. It is the register of the information received and of the internal investigations required by Ley 2/2023 art. 26.1; Directive (EU) 2019/1937 art. 18.1 calls it a register of reports. Each entry records the date and time, the report reference, the type, a summary, the outcome, the category code and whether it is anonymised; it does not record any data about the reporter. The types the module writes

are **Received**, **Acknowledged**, **Triaged**, **Investigation started**, **Extended**, **Closed**, **Forwarded**, **Purged** and **Retention deletion**.

The logbook only accepts new entries. If you try to modify or delete one, Odoo responds "The libro-registro is append-only and cannot be modified." or "The libro-registro is append-only and cannot be deleted." The only exception is retention, which anonymises the entries older than the years in its policy.

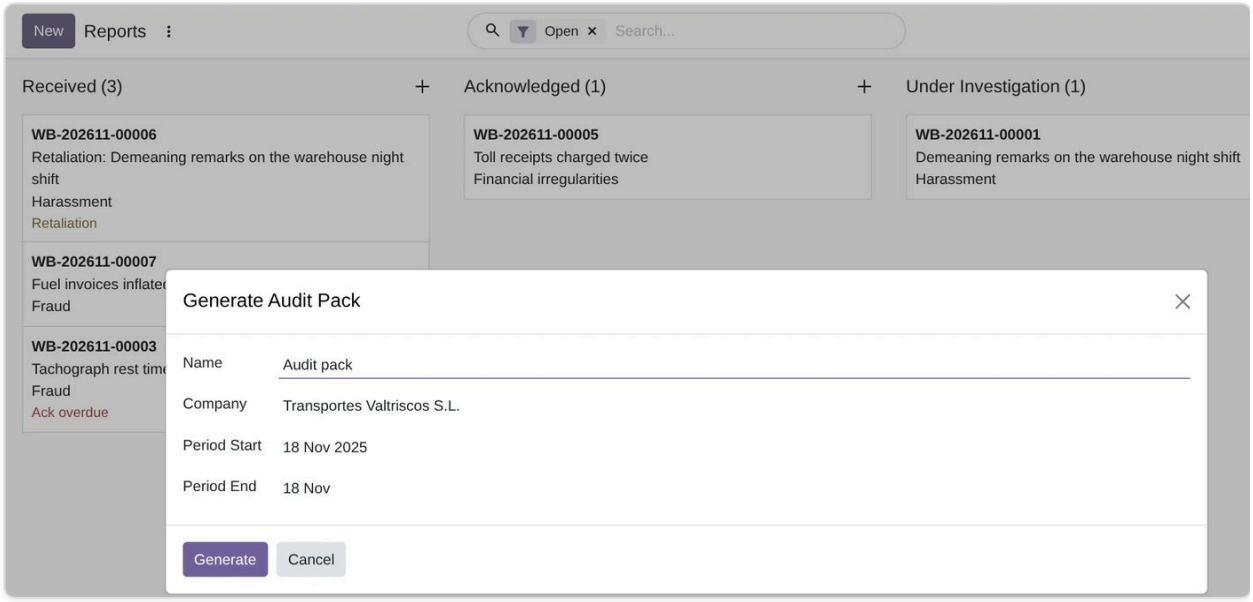
Verifying the chain

Each entry carries a SHA-256 hash chained to the previous one in its company. **Verify chain**, at the top of the list, walks the chain of each company you work in. If everything matches, Odoo shows "Libro-registro: chain intact". If someone changed the reference, type, summary, outcome or category code of an entry outside Odoo, it shows "Libro-registro: chain broken" and says which is the first entry that does not match.

The audit pack

1 Open the wizard

Go to **Whistleblowing › Audit Packs › Generate Audit Pack**.



- **Real Odoo 20 screenshot.** The **Generate Audit Pack** wizard, with the proposed period.

2 Enter the period

Fill in **Period Start** and **Period End**. By default they cover the last year up to today. You can change the **Name** and the **Company**.

3 Click Generate

Odoo creates the pack and opens its record, with its status, who generated it and when, and the ZIP in **Pack Attachment**. Odoo also stores its SHA-256 fingerprint. The packs are kept in **Whistleblowing › Audit Packs**.

Generate Audit Pack	Wizard that asks for the period, the company and the name, and generates the pack.
Generate now	Button on a pack's form. It is hidden when the pack is ready.
Verify chain	Button on the logbook list. It checks the hash chain.

What the pack contains and where its documents come from

The ZIP contains the period's logbook in CSV and PDF, the access log and the retention run log, statistics without personal data, the System Owner's designation documents and a README.

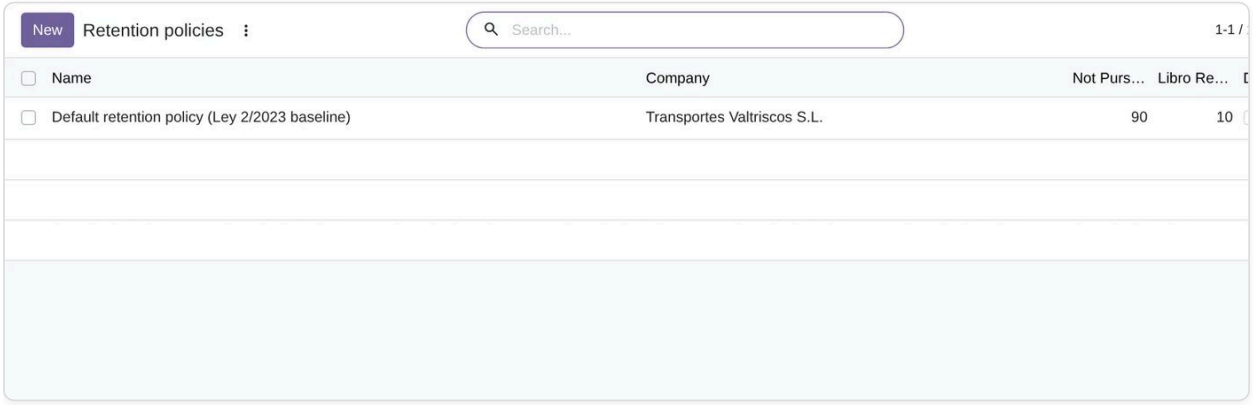
Policies and privacy notices are maintained in **Whistleblowing › Configuration › Policy documents** and **Whistleblowing › Configuration › Privacy notices**: each has a name, version, effective date, company and text, and its status is **Draft**, **Published** or **Superseded**. **Publish** only appears on a draft and **Supersede** on a published document. The DPIA goes in **Whistleblowing › Configuration › DPIA artefacts**, with its version, its date and who approved it; its status is **Draft**, **Approved** or **Superseded**, and **Approve** only appears on a draft.

> The logbook cannot be edited or deleted from Odoo: an incorrect entry stays as it is. When retention anonymises the entries older than the years in the policy, it changes their summary and reference, and **Verify chain** flags them as changed outside Odoo.

USER MANUAL · WHISTLEBLOWING

14 Retention and access requests

The retention job automatically deletes what its policy marks for deletion. Data subject access requests and the import of reports from another tool each have their own wizard.



- **Real Odoo 20 screenshot.** The list of retention policies with the company's default policy.

The retention policy

You will find it under **Whistleblowing › Configuration › Retention policies**. A default policy is created on installation. The scheduled task **Whistleblowing: enforce retention** runs every day and applies it.

Name	Name of the policy.
Company	Company the policy applies to.
Not Pursued Purge Days	Days after closure after which a report closed as inadmissible or unfounded is purged. Default is 90, allowed range 1 to 90.
Libro Registro Retention Years	Years after closure after which the reporter's data is deleted, and years after which the register entries are anonymised. Default is 10, allowed range 1 to 10.
Dry Run	Checkbox for test mode: the task counts what it would delete but deletes nothing.

What is purged and what is kept

90 days after closure of a report closed as inadmissible or unfounded, the task deletes the text of the facts, the reporter's identity, the outcome and measures, attachments, messages, notes and the case key. The report moves to **Purged (not pursued)** and the register records the purge. Article 32(4) of Spanish Law 2/2023 counts differently: three months from receipt of what was never investigated. The module counts from closure, so an open report that nobody investigates is not purged automatically.

10 years after closure, the task deletes the reporter's name, email and contact details from reports closed as founded, partly founded, unfounded or referred, and moves them to **Retained anonymised**. The text of the facts is not deleted. It also anonymises register entries older than 10 years. Article 26(2) of Spanish Law 2/2023 sets a maximum of ten years for keeping personal data from reports and investigations.

With **Dry Run** enabled, the task deletes nothing: it only counts how many reports it would have purged or anonymised. Each run is logged with its date, company and those counts. That log has no screen: it is included in the audit package.

Data subject access requests

These are handled from **Whistleblowing › Configuration › GDPR DSAR Assembly**.

1. **Identify the person**
   Enter their email in **Subject email** or their name in **Subject name**. At least one of the two is required.

2. **Choose how you verify their identity**
   In **Verification Mode** choose **Verified email**, **Signed PDF** or **In-person ID check**. With **Verified email** you need the person's email. With **Signed PDF** or **In-person ID check**, record the evidence in **Verification Note**.

3. **Click Assemble DSAR**
   The wizard reviews the company's reports, decrypts the reporter data, looks for matches with the person and prepares a ZIP with the data found, a list of what has been redacted and a README. In the **Result** group you see **Result Attachment** and **Matched Report Count**. The request is logged in the access register of each matching report.

If the request is for erasure, tick **Right-to-be-forgotten request (art. 17)**. The ZIP then includes a refusal letter based on the retention obligation in Article 32 of Spanish Law 2/2023. Review the letter before sending it: the module does not provide legal advice.

> Only the System Manager and the data protection officer can see the wizard, and only for their own companies. For another company, Odoo shows "You can only answer data subject requests of your own companies."

Importing reports from another tool

Whistleblowing › Configuration › Import legacy reports reads a CSV with three columns: the subject (subject or title), whether it is anonymous (anonymous) and the receipt date (received_at). Each row creates a report in **Received** in the **Channel** you choose, with its original receipt date: if that is more than 7 days ago, it appears with the acknowledgement already overdue. Each import is recorded as a batch in **Whistleblowing › Configuration › Import batches**, as **Done** or, if any row failed, as **Failed**, with the number of errors.

The **Vendor** you choose (Whispli, EQS Integrity Line, WhistleB, Whistlelink, FaceUp, SpeakUp or other) is only recorded; it does not change how the file is read. The facts text, reporter identity, status, messages and attachments are not imported.

> The purge only applies to reports closed as inadmissible or unfounded. An open report is not purged. Module deadlines are counted in calendar days, excluding public holidays.

15 What happens automatically

The module ships seven scheduled tasks that Odoo runs without anyone clicking anything. These five do the channel's work.

TASK	FREQUENCY	WHAT IT DOES
Whistleblowing: hosted channel (FlexigoTech Cloud)	Every 10 minutes	Collects what has arrived at the hosted page, confirms what was collected in an earlier pass, sends the reporter pending messages and reads the deadlines.
Whistleblowing: recompute overdue flags	Every 15 minutes	Recalculates which reports are overdue for acknowledgement or for response.
Whistleblowing: deadline reminders	Every hour	Creates one activity per overdue deadline for the System Manager, on the channel record. It does not repeat an identical one while it remains open.
Whistleblowing: enforce retention	Every day	Applies the retention policy: purges reports closed as inadmissible or unfounded and, once the policy's years have passed, deletes the reporter's data.
Whistleblowing: recompute per-case access validity	Every day	Revokes per-case permissions whose expiry date has passed.

All seven are active. The other two, which also start with Whistleblowing, have nothing to do on a fresh installation. To change a task's frequency, enable developer mode and go to **Settings › Technical › Automation › Scheduled Actions**. They are listed there under the English names you see here.

Separately from your Odoo, FlexigoTech Cloud monitors the deadlines of each report on the hosted page. It emails the channel's alert address on day 5 if there is no acknowledgement, and 14 days before the end of the response deadline. The alert only contains the channel, the reference and the date, nothing from the report's content.

16 If something fails

Odoo stops at each step that breaks a module rule and explains why in a message.

You cannot see the Whistleblowing menu	On installation nobody is assigned the module groups. An administrator has to give you the **Whistleblowing / Responsable del Sistema** group on your user record.

The channel cannot be published	This happens if the Responsable, the policy or the privacy notice is missing, or if your Odoo address is http. Complete what is missing on the channel record. For the address, set up https before publishing.
The hosted channel wizard rejects the address or asks you to accept	The page address accepts 3 to 40 lowercase letters, digits or hyphens, without the words flexigo or odoo, and cannot be another company's. Also tick the acceptance checkbox before activating.
A lifecycle button will not let you proceed	Each step requires coming from a specific state: acknowledging receipt only from **Received**, moving to triage only from **Acknowledged** and investigating from **Acknowledged** or **Under Triage**. Check the report's state.
The deadline extension is rejected	It needs a reason of at least 30 characters. Only one is granted per report, and the new date cannot be more than 6 months after receipt.
The closure does not complete	You must fill in the outcome and the summary of the measures. Without both, Odoo will not close the report.
Forwarding to the authority does not proceed	First choose the authority in the **Closure outcome** tab and click **Forward to authority** again.
A second Responsable cannot be left active	There can only be one active Responsable del Sistema per company. Deactivate the previous one with **Revoke**.
Someone cannot see the content of a report	On screen, the text and the identity of the reporter are visible only to the System Responsable, on the **Report content** tab. Investigators, HR and Legal cannot see them.

Warnings appear in English, exactly as the module writes them, for example "Cannot publish a channel without a Responsable." or "Only reports in state 'Received' can be acknowledged.". If you see a warning that is not listed here, copy the full text before looking it up.

USER MANUAL · WHISTLEBLOWING

17 Support

Every purchase includes 2 months of support: we help you install it, set it up and get it working, by email and video call. While you're subscribed, support for the service stays included. With the Standard plan we reply within 1 working day; with Pro, within 4 working hours. Tell us your Odoo version, the module version and, if there is an error, its full text.

Email

To install it, set it up or for any question.
comercial@flexigotech.com

On the web

The module page, with the guide and the prices.
flexigotech.com/en/canal-denuncias-odoo.html

On Odoo Apps

The module page on the Odoo store.
apps.odoo.com

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