CASE MANAGEMENT:
THE DEFINITIVE GUIDE

Comprehensive guidance and templates for the intake, management, handling and reporting of issues from your hotline, web and open door processes
INTRODUCTION

Imagine you are sitting in your office looking at the number of incidents reported over the course of one year. You start to see patterns: employee position, tenure, number of incidents reported by said employee, etc. You think to yourself, “There has to be a correlation here,” but you’re left wondering how to draw an actionable conclusion, not to mention, you need more data to fill in gaps. Where do you start? How do you bring this to your Board?

Using this guide will help you:

• Find new ways to gather data across your organization;
• Spot check your reporting channels;
• Uncover ways to standardize incident intake, monitoring and reporting;
• Address issue drivers instead of just the issues themselves;
• Be proactive and predictive versus reactionary;
• Dig into trends that could signal retaliation;
• Ensure consistent responses; and
• Deliver thoughtful analysis on your incident data to senior leadership.

This guide includes:

• Interactive exercises and worksheets to help identify trends and draw insights you can act on;
• Conversation framework to bring your findings to the Board; and
• Expert insights from industry professionals.
We created this guide to help compare the traditional with a new-age way of running full steam ahead with a best-in-class compliance program. From legal requirements to the changing technology landscape, it can be overwhelming to be a compliance executive now more than ever.

Compliance was barely a role 10 years ago. While a lot of compliance tactics were handled by other departments, it was not a dedicated or centralized function. Today, the chief compliance officer and the ethics and compliance team are responsible for more oversight and controls with inadequate resources and staff. Given the new status quo, it is key to supplement your efforts with technology that can streamline your processes while giving insight into all areas of compliance.

Walking away from the conversations I have with compliance officers, I notice time and time again that employee hotlines are viewed by a CCO as a purely tactical, not strategic, compliance function that’s often co-managed by other departments such as internal audit. A surface-level understanding and “check the box” mentality around your hotline can cause a huge pothole to only grow wider and deeper. Antiquated systems coupled with manual processes wreaks havoc on compliance effectiveness and efficiency, to say nothing of the opportunities missed for floor-to-ceiling company culture analysis.
While the compliance department is certainly not looking to add more work to their plate, they do need to have insight into:

- What kinds of matters are being raised through which reporting channels;
- How effective compliance and management are at responding to issues that are raised; and
- The outcomes and sanctions tied to different cases.

It’s nearly impossible not to mention how time consuming it can be to manually pull together this data. The CCO will spend more time pulling it than actually analyzing, let alone executing, on it to mitigate risk areas. Compliance executives today are too busy putting out fires on a reactive basis, when they should be anticipating issues before they happen and putting controls in place to minimize their likelihood and impact—or prevent them from occurring altogether.

Apart from the data, there is true advantage in centralizing your internal investigation process, regardless of the type of issue or department responsible for investigations. Employment Law, as well as Tort Law, supports a company who acknowledges wrongdoing. A company is given credit for recognizing when there is an issue, appropriately responding to the situation and making a reasonable attempt to decrease the likelihood of similar events occurring in the future. Furthermore, showing that your team members follow a consistent investigative process and apply consistent responses can aide in establishing an affirmative defense in the event of a breakdown. If all those elements are in place, but you don’t have the systems or documentation of those efforts readily available, you’ll be hard-pressed to earn confidence—or credit—from the government.

On the employee side, having an anonymous and secure way to report concerns ensures they have somewhere to turn when they don’t feel comfortable making reports in person. How easily they can make reports and how confident they are in your channels’ security and confidentiality will directly drive how likely they are to use those channels. It’s important to remember that a sparsely used hotline is not necessarily an indication that all is well.

My advice, in short, is this: Don’t be complacent. You can’t afford it. And recognize the opportunity you have to drive drastic change and improvement with even the most minimal extra effort. But I can assure you that the cost-benefit (or, at a minimum, the cost-cost avoidance) will be well worth it.

Yours in compliance,

Autumn Sanelli
Convercent
THE DEFINITIVE GUIDE: CLIFFSNOTES

What you’re about to embark on is truly definitive, meaning it’s highly-detailed and not intended to be digested over a single cup of coffee. Feel free to dig deeper into the following contents as your time allows, but we invite you to read the CliffsNotes version here.

PART I: REPORTING CHANNELS

- There are three common reporting channels: telephone hotline, web intake, proxy.
- Choose a hotline system that fits all parts of your company domestically and globally.
- Offer multi-language capabilities; ensure consistent company branding on landing pages/intake forms/messaging; constantly raise awareness of any/all available channels; regularly extract hotline data.
- Publicize anonymity options and set up an offsite computer or telephone to foster privacy.
- QA the hotline often using the secret shopper method.

- Encourage employee participation by remembering the PEAR approach:
  » Publicize your hotline channels across your organization (posters, emails, meetings)
  » Educate employees how to use the system
  » Analyze data to identify trends or issues
  » Respond quickly, appropriately and consistently to incident reports

- Track each incident and investigation process with a detailed paper trail.
- Consider your global employees and account for cross-cultural nuances in communication, anonymity, etc.
PART II: CASE MANAGEMENT

- Once a report is received, it’s time to move onto managing the case. Case management is easiest if you think of the process as having three stages: organization, handling and post-case analysis.
- Are there multiple allegations to consider?
- Route case to the appropriate parties and escalate the incident in a timely manner.
- Remember to keep the process iterative. Leave room for review, improvements and adaptations to your organization’s culture and compliance program.
- Document, document, document!

PART III: DIAGNOSING CULTURE

- Identify the root cause of any incident to help understand the people, attitudes or environments driving your issues. Doing this will not only help address the problem at hand, but help prevent the issue from recurring in the future.
- Set and fortify tone from the middle up.
- No one—including your executive peers, your CEO and Board—live and breathe this stuff like you do, as much as we would like them to. Exercise patience and drive participation through education.
- Lean, and lean hard, on tone in the middle. You shouldn’t let a potentially disengaged board affect the rest of the program (and all of your hard work). Strive to continuously communicate about compliance and engage mid-level and regional managers to jump on the bandwagon. Building and maintaining a strong compliance commitment on the front lines can lend itself to preventing noncompliance, regardless of what tone is coming—or absent—from the top.
- So you’ve got an anti-retaliation policy…but does it work? Don’t take face value data that gives you the answer you want to hear. Dig deep. Gather employee performance data from other departments such as HR to help understand the reality of retaliation, and send the message to your company that it is being monitored.
PART IV: ANALYTICS AND BOARD REPORTING

• The data you extract from your incident reports and cases are a clear window into potential compliance program weaknesses. Thoroughly document all parties, issues type and program components to uncover trends or identify compliance hotspots.

• Bring these findings to your board to help them understand your company’s compliance program at the same level of detail as other business functions. Deliver a regular, insightful report and be consistent and efficient with your findings and follow-up actions.

PART V: HOW TO GET STARTED

• Don’t try and boil the ocean. But don’t be complacent or resistant to changing “the way it’s always been done.” There are some easy ways to get some “quick wins” in the way you take in, manage and analyze issues. Develop a plan with short and long-term goals in mind.
PART I:
REPORTING CHANNELS
Many compliance executives use data from their hotline and investigations to judge the effectiveness of their compliance program, hence the recent impetus to keep these aspects of your program centralized, your efforts well-documented and awareness of such consistently high throughout your organization.

With the growing trend among third-party regulators to appeal directly to employees for information, it’s more important than ever to create a corporate culture of openness, trust and communication. A well-planned, well-executed hotline can help you discover and resolve internal issues before they escalate into very public and very costly situations.
REPORTING CHANNELS

Allegations of misconduct may be reported through one of the following channels:

A TELEPHONE HOTLINE

Employees call into your dedicated hotline and report incidents over the phone to a trained compliance operator.

Extract data from finding out the following information from your telephony statistics:

» Number of rings before pickup – how long does it take to get an answer when someone calls?
» Call abandonment rate – the number of times a caller gives up and hangs the phone up.
» Distribution of incoming calls during the day – the volume of incoming calls and when they occur most (i.e. you see a surge in the morning and late in the afternoon).

B WEB INTAKE

Employees may submit incidents using a web form that is distributed through the compliance department, who then monitors, prioritizes and assesses the incident. Make sure your intake forms are branded, language is consistent, provides contact phone numbers and consistent messaging. This will increase trust among your organization and encourage employees to report incidents using this channel.
Employees reach out to a proxy, someone from compliance, legal or HR - for example. The proxy then enters whistleblowing reports on behalf of the reporting employee(s) that may have been received through email, in-person, phone, SMS, etc.

DO YOU HAVE A GLOBAL ORGANIZATION?
If you manage compliance for a global workplace, make sure the hotline you choose is designed to meet your special requirements. Look for a system that can be customized to accommodate cultural differences and that offers multi-language capabilities for both online submission and phone support.

GOING GLOBAL: A NOTE ON ANONYMITY, PRIVACY AND DATA COMPLIANCE

For a whistleblowing channel to be effective, it needs to be consistently used by employees. Use requires trust, which relies in no small part on the protection you afford your whistleblowers through various mechanisms, processes and procedures to protect confidentiality, anonymity and sensitive data.

Any multinational organization will encounter varying standards and stringency around data protection and privacy related to incident intake. The European Union, for example, prioritizes privacy over free speech, while the US does the reverse; other countries fall somewhere on the spectrum in between the two.

This can complicate things when your hotline spans across different countries that have nuanced—and sometimes divergent—standards. Here we outline some of the most common challenges organizations face when configuring a global hotline.
TELEPHONY
Configuring international telephony is a complicated and time-consuming process. That said, it’s critical that someone (if only a vendor) do this thoroughly and correctly on behalf of your company. Employees should have an easily accessible number to call where they can report issues in their native language. The more complicated you make it for employees to get to your hotline, the less likely they are to report issues.

ANONYMITY
In countries where anonymous reports are prohibited or strongly discouraged, encourage “confidential” rather than “anonymous” reporting to make it clear that reporting is confidential, but on a named basis. If you allow reporters to remain anonymous in countries where it’s permitted, be sure your call center and web intake are configured to handle the different scenarios.

Note: our goal isn’t to rundown a laundry list of country-by-country standards for your hotline. For that, we recommend working with an attorney well-versed in the requirements for the jurisdiction you’re looking to deploy in. Our aim is simply to provide a list of key considerations to account for when deploying an international hotline.
ISSUE TYPES
Many countries restrict the type of matters that can be reported via a hotline. Complaints that fall outside that scope should be filtered out at as early as possible.

DATA COLLECTION
Only collect the minimum amount of data necessary, as companies are held to a very high standard regarding the type of information they gain throughout the course of doing business.

REPORT SUBJECTS
Some areas restrict the types of reports you can take in based on the accused individual, with varying standards for management and non-management employees.

RIGHT OF CORRECTION
Any employee who is the subject of the report should be: (1) informed that the report has been made; (2) provided access to the report; and (3) given a chance to correct, clarify and/or respond to the allegations.

TO BUILD OR BUY A HOTLINE
Many organizations first implement a hotline internally (‘build’) and then - for a range of reasons - may move to an external third-party provider (‘buy’); thereafter, they may move to another provider or, indeed, return to internal implementation.

These decisions can be driven by a wide range of considerations, including, but not limited to:
- Cost comparisons
- Overall whistle-blower hotline performance
- External third-party provider relationship
- Data protection performance and issues
- Case/report management capability and performance
- Translation practice and performance
- Telephony infrastructure costs and configuration/change challenges
- Infrastructure issues - communications, policies, posters et. al.
DATA RETENTION
Many countries, particularly in the EU, have strict standards on what type of data can be stored, how it can be stored, where and how it can be transferred and how long you can legally retain that information. For these reasons, processed data should not be retained for any longer than is strictly necessary.

REGISTRATION REQUIREMENTS
Companies operating in the EU are generally required to notify the applicable Data Protection Authority (DPA) to communicate the purpose and intended use of the hotline. Before implementing a hotline, contact the DPA that oversees each country or territory where you have an employee presence to gather requirements and understand information which may exempt your company from participating (e.g., number of employees).

COMMUNICATIONS
Promote and explain the hotline in communications tailored to local employee populations. Account for local issues (like anonymity or issue types) and cultural nuances and, above all, make your hotline and communications available in employees’ native language.

SUCCESS TIP

1. Remember: The name of the game is to collect, analyze and share data while protecting personal privacy and adhering to local privacy standards.

2. Your hotline and case management systems should be configured through geography rules or other mechanisms to handle these various scenarios, consider training call center agents, managers and any other employees who could potentially field reports from employees. They’ll need to know what can be reported and captured, how to offer guidance to reporting parties for issues they can’t assist with and how to notify the compliance or legal teams if needed.

3. Establish a schedule to periodically review and audit your policies, procedures and compliance related to these global requirements as they tend to be moving targets.
PART I: REPORTING CHANNELS

PRIVACY
Each channel should enable employees to submit their report from the privacy of an off-site computer or telephone. It may seem like a small convenience, but giving employees the freedom to enter a compliant from a location that “feels safe” can make a huge difference to participation rates.

OFFER ANONYMITY
Develop and maintain your hotline externally. Employees tend to trust hotlines maintained by third parties more than they do internally maintained systems. Submitting reports through an external hotline is perceived to offer an extra layer of anonymity and impartiality compared to an in-house developed system. A third-party provider is more likely to bring in specialist expertise that’s difficult to match within the organization.

THE CHANGING WORKFORCE AND HOW TO KEEP IT COMPLIANT
Since 2000, the population has grown faster than jobs can be created with millennials (15-35 years-old) entering the workforce in swaths, according to the Bureau of Labor Statistics. Baby boomers are working longer in life as pensions are now a luxury of the past and retirement funds are the sole responsibility of the employee.
More and more companies are doing business or working with operations in other countries, increasing the need to understand the risks of emerging global markets, cross-cultural understanding and diversity management. The U.S. Census indicates by the year 2050, half of the country will be composed of people of color -- a quarter of whom will be Hispanic.

Across the board, there is extreme shortage for skilled workers as the older generations exit the workforce, companies are struggling to find qualified replacements. Companies are seeking freelance workers on a contingency basis to fill the need, however, liability increases trying to determine which restrictive covenants make sense for the business, such as restricting the freelancer from using customer information, IP and ability to work within the same industry. The legal ramifications behind these workers remain unclear, according to a study by employment and labor law firm Littler Mendelson.

The concern of a diverse workforce is real and gets complex quickly, alongside the treatment and future of older workers, contingent employees, outsourcing and the varying impetus for effective education and training.
If you haven’t already, take the time to build an operational framework that sets the stage for changing workforce guidelines. You can always add to it and treat the framework as a working document as the workforce evolves over the years. Topics to consider examining deeper when building out the framework:

- Hiring process
- Performance appraisal and promotion
- Discipline and termination
- Investigations and their performance
- Leaves of absence/FMLA
- Americans with Disabilities Act
- Discrimination
- Harassment
- Wage and Hour Law
- Workplace violence
- Affirmative action
- Reductions in force
- Independent contractors
- Establishment of policies and training
- Selection of technology
- Use and management of external vendors

Amid the changes you need to ensure your organization is meeting its compliance obligations. By building a responsive program you can anticipate and comply with legal requirements.

**TRACKING ALL INCIDENTS IN ONE PLACE IS KEY TO EFFECTIVE INVESTIGATIONS**

Regardless of which channel an incident is reported, best practice is to have all incidents recorded and managed in a single, streamlined and central location for accessibility, comprehensive reporting capabilities and to ensure consistent investigation and response procedures across all incident types. All information, no matter which channel, should be entered precisely as it was reported.
“It’s essential to offer reporting processes, training codes of conduct, and policies and procedures in the native language of your international employees. When a company goes before the Department of Justice and the SEC, that’s one of the first things they look for.”

- Mary Shaddock Jones
  Attorney at Law, formerly AGC and Director of Compliance for Global Industries, Ltd.
To encourage employee participation, follow these four best practices for incident-reporting management:

**1. PUBLICIZE**

If employees don’t know about the hotline, they won’t use it. Allocate a portion of your time and budget to promoting the hotline through multiple channels. Put up posters, deliver in-person presentations and remind employees regularly through email, newsletters or intranet sites.

**2. EDUCATE**

Ensure your employees know how to use the system. Make sure they understand the types of activities or observations are appropriate for reporting and which are not. HR, compliance staff and even leadership will need training, too, to help them understand how hotline impacts their day-to-day activities. Face-to-face works best and is more effective than leaving training materials that sit on a shelf unused.

**3. ANALYZE**

Use the data from the hotline to identify unexpected trends or issues. Overtime, your hotline will become the most powerful analytical tool in your compliance toolbox.

**4. RESPOND**

Respond promptly and appropriately to hotline complaints – this will ensure robust participation and ongoing success. When people see their concerns are heard clearly and addressed fairly, they will learn to view the hotline as a valuable conduit.
Most of these metrics are straightforward: the requirements are either clearly met or they’re not. With that in mind, we recommend using a simple pass/fail scoring system. The key here is to identify your performance requirements, particularly in the Connection category. We’ve put in some standard metrics as recommendations.

### SECRET SHOPPING TEST SCENARIO VARIABLES

No two companies are the same, and each company has their own philosophy, processes and procedures for handling issue reports. That said, we recommend creating scenarios that test key attributes and requirements of your hotline and case management process, in addition to one or two straightforward scenarios that can establish a performance benchmark. Here are some recommendations to get you started.

<table>
<thead>
<tr>
<th>VARIABLE</th>
<th>DESCRIPTION</th>
<th>FOCUS METRICS</th>
</tr>
</thead>
<tbody>
<tr>
<td>International locations</td>
<td>Place the call from one of your international locations in that locations’ native language.</td>
<td>Accessibility; Connection; Introduction</td>
</tr>
<tr>
<td>Issue routing and escalation</td>
<td>Create scenarios of varying severity that would be routed/handled differently.</td>
<td>Report Dispatch; Written Report</td>
</tr>
<tr>
<td>Anonymity</td>
<td>Ensure you’re complying with local data privacy standards.</td>
<td>Information Gathering; Written Report</td>
</tr>
<tr>
<td>Security and confidentiality</td>
<td>Name one of your issue recipients as a subject to ensure they don’t receive or see the issue.</td>
<td>Report Dispatch</td>
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<tr>
<td>EVALUATION CRITERIA</td>
<td>SCENARIO 1</td>
<td>SCENARIO 2</td>
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<tr>
<td><strong>ACCESSIBILITY</strong></td>
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<tr>
<td>Local hotline number is easy to find for employees</td>
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<td>Local hotline number works when dialed</td>
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<td><strong>CONNECTION</strong></td>
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<td>24/7/365 availability of live agent</td>
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<td>Hold time &lt; 20 seconds*</td>
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<td>Availability of interpreter</td>
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<td>Hold time for interpreter &lt; 2 minutes*</td>
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<tr>
<td>Total call time &lt; 10 minutes**</td>
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<tr>
<td>&lt; 5% call abandonment rate**</td>
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<tr>
<td><strong>INTRODUCTION</strong></td>
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<td>Call opened with correct greeting, in correct language</td>
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<td><strong>INFORMATION GATHERING</strong></td>
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<tr>
<td>Agent properly determined the reporter’s needs</td>
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<td>Agent gave appropriate explanation of service</td>
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<tr>
<td>Agent read the terms and conditions verbatim</td>
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<tr>
<td>Agent offered an appropriate incident type and provided description</td>
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<tr>
<td>The agent listed and described anonymity options (where allowed)</td>
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<td></td>
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<tr>
<td>Agent used probing questions to gather more information</td>
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<tr>
<td>Agent verified how to spell names of involved parties</td>
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<tr>
<td>Agent read information back to reporter and it was accurate</td>
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<tr>
<td>Agent did not adversely influence reporter’s decision to file the report (by giving opinions/advice or inaccurate/biased information)</td>
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<tr>
<td>Agent provided instructions on how to check the status of the report</td>
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<tr>
<td>Agent provided instructions on how to check the status of the report</td>
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### SECRET SHOPPING TEMPLATE

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<thead>
<tr>
<th>EVALUATION CRITERIA</th>
<th>SCENARIO 1</th>
<th>SCENARIO 2</th>
<th>SCENARIO 3</th>
<th>SCENARIO 4</th>
<th>SCENARIO 5</th>
<th>SCENARIO 6</th>
<th>SCENARIO 7</th>
<th>SCENARIO 8</th>
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<tbody>
<tr>
<td>CALL CONTROL</td>
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<td>Agent controlled call length and did not allow the caller to repeat information</td>
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<td>Agent controlled content by focusing on relevant facts and details (not on reporter’s emotions)</td>
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<td>QUALITY</td>
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<td>Agent did not sympathize with the reporter (empathy, not sympathy, is OK)</td>
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<td>Agent spoke to the reporter with respect</td>
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<td>Agent avoided inappropriate use of hold or excessive periods of silence</td>
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<td>Agent spoke clearly and professionally</td>
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Click [here](#) to print.
### REPORT DISPATCH

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<th>SCENARIO 2</th>
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<th>SCENARIO 5</th>
<th>SCENARIO 6</th>
<th>SCENARIO 7</th>
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<tr>
<td>Report was dispatched immediately upon completion*</td>
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<td>Report was received by the correct individuals based on company routing rules</td>
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<td>Agent read the terms and conditions verbatim</td>
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### WRITTEN REPORT

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<th>SCENARIO 5</th>
<th>SCENARIO 6</th>
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<td>Agent captured correct location</td>
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<td>Agent captured correct issue type</td>
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<td>Agent accurately reflected reporter’s anonymity preferences</td>
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<td>Agent wrote report description, responses to questions and additional thoughts in the ‘first person’</td>
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<td>Agent accurately captured reporter’s responses to all incident detail questions</td>
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<td>Agent entered suspected individual names</td>
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SECRET SHOPPING – A BEST PRACTICE

Despite the level of training or trust you may have with your call center, mystery shopping is a best practice approach used across the industry, however, it is rarely used in a non-financial context. When you conduct a secret shop, that is, by calling into your own call center and posing as an employee presenting a problem they should be able to solve – you can identify gaps, areas to re-train, and gather data to test and measure performance.

To improve your hotline effectiveness, consider regular check-in’s. Secret shopping your hotline is a fast assessment that can easily derive useful data and identify gaps in your program.
“Put simply, the mystery shopping program was a revelation; we found that despite all our blood, sweat and tears invested in training, there were often common compliance failures across whole swathes of operators; we also found that certain call centers were consistently, and significantly, worse than others, which enabled us to undertake root-cause analysis; some of those failures were traced to high employee ‘churn’ levels, which resulted in us then focusing on employee retention.”

- Keith Read

SIMPLE VS. GUIDED INTAKE

There are two ways to configure intake processes that are based on differing compliance philosophies: whether the employee should classify the issue type, or that responsibility is best left to an administrator.

Guided Intake: Employees submit issues by first classifying the issue type, then answer incident-specific questions. The issue is routed according to their classification and the organization’s routing rules. (This is the more widely-used method.)

Simple Intake: Reporters are asked to first explain the incident and provide details. When a report is submitted, administrators categorize the issue based on the provided information and route it accordingly.

EXPERT INSIGHT

Whenever I travel to one of the countries where we have a business, I test our Helpline telephone number. I ask a random person who works at our local business to make the call. I ask the caller to make up whatever story he or she would like to use in making the report – either an allegation of wrongdoing or a question about policy. Because I don’t give the caller any other information, including the telephone number to call, it allows me to test whether the person can figure out how to call the Helpline on their own (is the Helpline effectively advertised internally?) as well as to test whether the telephone number is easy to use and actually works (in some countries for example, some toll free process, including speaking in the local language, it helps us test not only the connection but also how well the translator translates the caller’s story, how polite and friendly the operator is, whether the report is transcribed accurately, and how quickly it gets to the right people in our ethics and compliance team. Experiences from this process have helped us greatly improve the user experience for our Helpline around the globe.

- Peter Jaffe
CECO, AES Corporation
GUIDED INTAKE CHECKLIST

Recommended steps in gathering the right information

☐ Step 1: Select the location and where the incident occurred.

☐ Step 2: Acknowledge the terms and conditions, which usually include a notification that the intake channel is not an emergency service.

☐ Step 3: Select the issue category and a series of related questions.

☐ Step 4: Describe what happened and provide information about the involved parties (subject, witnesses or victims).

☐ Step 5: Provide the date, time and located where the issue occurred.

☐ Step 6: Upload any supporting files, photos or documents relating to the allegation. If creating a report through the call center, reporters can access their report and submit files online.

☐ Step 7: Provide your information and set anonymity preferences.

☐ Step 8: Review and verify report accuracy.

☐ Step 9: Create a complex password (8-20 characters, including upper and lower case letters, numbers and special characters such as !, @, #, $, etc.) and security question to access the case.

☐ Step 10: Receive and record the case number.

For more information on hotline: Download the 7 Essential Hotline Features
PART II: CASE MANAGEMENT
Once a report is received, it’s time to move onto managing the case. Case management is easiest if you think of the process as having three stages: organization, handling and post-case analysis.

While consistency, approachability and accessibility are key during report intake, efficiency is the name of the game once the report’s been filed. If efficiency can be extended throughout the processes related to routing, communication, investigating and analysis, your team will have more time to spend in the field and conduct a better analysis on incident handling and trends. Not to mention this can and will lead to swifter and more consistent case resolutions, which will foster and fortify accountability, transparency and confidence in organizational justice within your company.

Being able to identify and resolve issues before they escalate to an external investigation or litigation is one of the most well-known benefits of a hotline, but the reality is that not every issue can be caught internally. What’s less well-known is that an effective hotline system can help an organization prepare for these challenges more effectively and achieve a better outcome.
COMPLEX CASES

Compliance incident reports are rarely simple and straightforward—they often involve multiple parties and multiple types of allegations. According to the 2013 National Business Ethics Survey from the Ethics Resource Center, two thirds of misconduct either occurs over multiple incidents or is an ongoing pattern. Misconduct also usually involves more than one person, as the survey reported 41 percent of observed misconduct was committed by multiple individuals, with 12 percent committed company-wide.

It makes little sense, then, to oversimplify the reporting process by requiring separate reporting and tracking of each issue and forcing reporting parties to choose one allegation type to focus on, or to file multiple complaints. Reporting parties should have the ability to report multiple allegations involving multiple parties in a single case. Each allegation can then be managed to closure by tracking substantiation, action taken and key findings involving a variety of involved parties, including subject, witnesses and reporting parties.

This approach accounts for the complexity of the reports compliance teams usually receive and the granularity they need to have insight into and report on to effectively manage these cases to close. The company benefits from more insightful data analysis such as commonly related issue types and trends in involved parties across issues, to name a couple.
INVESTIGATIONS
Half the battle of tracking an incident is documenting an easily accessible paper trail. With the complications of differing intake methods and use cases, and varying reporting channels, establishing a standardized process to plan, conduct, and report on findings from internal investigations is imperative. If an incident is elevated to the court level or the regulators come knocking, you must be able to provide documentation on-demand.

Additionally, a standard investigation process allows you to gain insights to become proactive and predictive rather than reacting to incidents one-by-one. Your case management system can and should support this investigation process.
Here are the fundamentals for establishing an investigation process foundation. These are the elements that – if you are not already doing these – will bring you on par to a basic investigation process.

### 1. ASSESS THE ISSUE

Has any potential violation taken place? [YES NO]

If yes, which? ________________________________

What company policies were broken? [YES NO]

If yes, which? ________________________________

What laws were broken? [YES NO]

If yes, which? ________________________________

### 2. PLAN AND DEFINE OBJECTIVES

What are you trying to achieve?

What will it take to get there?

What is the standard of proof you will need for each investigation’s findings?

Continued on next page
What information will you need to meet your objectives? (Who, what, why, when, where, how?)

Which members of your team will be involved with each investigation?

Who will actually conduct the investigation?

Who are the decision-makers who have the authority to make the final call on any disciplinary action?

3. Gather the Information

Leverage a variety of investigation methods including: interviews, research and audit, physical or electronic surveillance, forensic analysis or undercover research.

- Record all tasks and activities, who performed them and when and where they took place.
- Record all evidence, including digital files or a description of physical evidence and its location.
- Log descriptive notes for all tasks or evidence, such as a summary of an interview.
- Identify all parties involved, including reporters, witnesses, affected parties, subjects, interviewees and investigators.
- Log all email communications related to the investigation.
- Provide limited access for managers or other non-investigators who need to check on the status.

Continued on next page
THE BASICS

4 VERIFY AND ANALYZE

Conduct interviews with the subjects in a neutral location and always have a third person in the room to act as witness. Start the interview by explaining how you learned of the allegation and describing all the methods you used to investigate the incident. Then, let the employee know that this is his or her chance to share their side.

Your goal is not just to resolve this case, but prevent similar incidents from happening again. To do this, you should get the person to:

- Admit to the offense
- Tell you how and why they did it
- Find out who else was involved or if other offenses occurred

Don’t forget: Record this all in your case management system. Document when the interview took place, where it occurred, who was there, and provide a summary that describes the details.

5 PRESENT RESULTS AND MAKE A DECISION

Within your case management system, compile all the information you need to write a report. This should include:

- An executive summary outlining the basic facts of the investigation, including the original allegations, the outcome of the fact-finding process and who was involved with the offense.
- Detailed account of the investigation that describes all the methods you used, the evidence you uncovered and which claims you’ve substantiated and which you haven’t.
- List of evidence supporting your conclusions, including interview summaries and other corroborating documents.
- Copies of the signed admissions of the people involved with the offense.

CONTINUED ON NEXT PAGE
THE BASICS

- Final summary reiterating the investigation’s findings of fact, including which policies or laws were violated and what controls were in place to prevent, uncover and address these violations.

Avoid making recommendations for disciplinary actions and take the ‘just the facts’ approach. Leave the rest up to the decision-making team.

DETERMINE DISCIPLINARY AND CORRECTIVE ACTION

The baton now passes to the decision-making team who will use your findings from the investigation report to determine appropriate disciplinary action. It’s important that this team is separate from the investigative team, has the authority to enforce disciplinary action and can affect change to compliance controls to prevent a reoccurrence of the issue. You can create a follow-up plan to ensure any corrective actions do take place. Don’t forget to change the status of the incident in your case management system.

CLOSE THE LOOP

Circle back to the impacted employees after an investigation concludes to let them know you’ve resolved the issue. This will increase their perception and confidence in organizational justice and cultural transparency.

The opportunity is ripe to find and correct any root causes of bad behavior (see Root Cause in this guide). Whether operational problems like weak controls or cultural issues like management pressure, understanding the drivers and influencers of bad behavior better equips you to anticipate and prevent similar issues from occurring in the future.
CASE ROUTING & ESCALATIONS

No matter how a report is made, it should be dispatched immediately. Configuring routing rules, escalation procedures, notification settings and access controls so issues are immediately forwarded to the appropriate “need to know” people and privilege, confidentiality, security and non-retaliation are protected. Email, SMS, or phone call notifications to specific executives may also be activated in some severe cases.

We talk a lot about being proactive rather than reactive, but the reality is, you’re never going to be a fortune teller. There will be incidents that you will have to bring out your firefighting gear for, and that’s ok. However, having an escalation process in place can help you smother the flames faster. A formalized process can ensure that open incidents don’t remain open and are properly addressed. It also helps senior leaders to stay adequately informed about and actively engaged in compliance issues that warrant their attention.

Bring order, structure and laser-focused attention to lingering incidents, not to mention, by having a formal escalation process in place you will close more incidents, which sends the message to your employees that incidents undergo thorough follow-up and encourages them to report misconduct.

Remember to keep the process iterative and leave room to review, learn and adapt to your organization culture and compliance program. By getting the entire company involved, you can allow anyone to escalate an incident.

WHAT IS YOUR CASE MANAGEMENT MISSING?

WHAT IS YOUR CASE MANAGEMENT MISSING?
DOWNLOAD OUR INFOGRAPHIC TO FIND OUT.
PART III:
SETTING THE CULTURE
ROOT CAUSE

You may look at some issues that come across your desk and wonder, “what were they thinking?!” Ask that question of every issue, no matter how insignificant it may seem, and document the answer. While, for most compliance executives, preventing issues is top-of-mind; an uncommon attempt to document and address what actually causes the misconduct in question.

HOW ROOT CAUSE HELPS

When you identify the true influencing factors behind misconduct, it can help you determine and address program weaknesses. Examining root cause can shine a light on problems within your organization down to the employee level. Oftentimes, even comprehensive program and culture assessments may not uncover the true problems behind the problems quite like tracking root cause information as you investigate each and every case.

Additionally, identifying root cause allows you and your compliance team to evolve from short-term, reactive incident triage to proactive issue mitigation. By identifying the root cause, you will have the chance to get ahead of issues.
DIGGING DEEP MATTERS
Identifying a root cause can feel like playing a game of operation – trying to pinpoint the true cause can be difficult, surgical, and require a steady, persistent hand. In many cases, the root cause is about the nuances, with several factors, both internal and external, frequently contributing to the noncompliance.

For example, an employee may be up-to-date with policies, have near-perfect training scores, but a poor or misguided decision can lead to a slippery slope of noncompliance. Once one deed has gone unnoticed and unpunished, it is easy then to rationalize additional missteps, especially if the employee perceives it as not hurting anyone or the company.

This is where digging deep to find the root cause really matters. Without understanding what happened and what specific influences factored in, it is hard to correctly address the problem. Simply adding a new policy or training course may not cut it, and ultimately, not improve your program – leaving the weakness open for repeat offenses.

WHAT TO LOOK FOR
Keep in mind these two main factors that help influence noncompliance:

- The mind set of the individual committing the misconduct (behavioral factors); and
- Outside influencers that helped promote, encourage or justify that behavior (environmental factors).
BEHAVIORAL FACTORS
Blatant disregard for company policies, rationalized behavior, or ignorance to a policy or rule. There may be more than one influence from each category.

Insubordination: an act of willful disobedience.

Lack of sensitivity: the employee was not aware of the conduct would have an effect on others, or, the employee knew their conduct would have a negative effect on others, but rationalized it by saying it’s the way they are.

Lack of awareness: the employee did not realize their misconduct was wrong and/or didn’t realize they needed to abide by the rule.

Company loyalty rationalization: “I was generating profits for the company.”

Legitimate action rationalization: the employee rationalized their actions claiming the rule is outdated and that every other employee was doing it.

No harm rationalization: employee rationalizes action because it caused no harm to anyone.
ENVIRONMENTAL FACTORS
Pressure from organizational or managerial expectations – either expressed or implied. There may be more than one influence from each category.

Culture influences: culture differences from inside or outside the organization.

Financial or performance incentives: incentive compensation or a performance reward drove the violation.

Operational burden: undue operational burden left insufficient time to perform in a compliant matter.

Pressure from management or peers: pressure to conform or complete tasks at all costs driven by a superior or peers contributed to the violation.

Process design: a poorly designed process created conditions that facilitated misconduct.

Remote or inadequate supervision: conduct occurred in a remote affiliate and/or under insufficient supervision.

Weak controls: there were weak controls over the employee or third-party activity that allowed for a violation.

Analyzing the root cause of compliance misconduct will not lead to a fully predictive program, but can be a factoring variable to spot holes or cultural breakdowns. It’s not as cut and dry as it seems – the causes behind misconduct aren’t simple and are unlikely to be quick (or easy) fixes. Take your time to understand the factors, which will help your program go from good to great and get one step closer to a predictive program that can stop noncompliance before it ever happens.
Employees at any organization tend to judge leadership on three contributing factors, according to the National Business Ethics Survey (NBES) from the Ethics and Compliance Institute (ECI).

- The overall character of their leaders as experience through personal interactions;
- How senior management handles crises; and
- The policies and procedures adopted by senior leaders to manage the organization.

Supervisors can impact the organization’s ethics just as much as the executive team. “When it comes to modeling good behavior, keeping promises, or upholding organization standards, direct supervisors may matter just as much or more than CEOs and other senior executives,” stated the NBES.

2 in 5 workers pointed to their immediate supervisor when asked who they consider senior leadership. Workplaces which leaders display ethical leadership tend to have lower rates of misconduct, less pressure to break rules and greater employee engagement.

- Ethics and Compliance Research Initiative (ECI)
**TONE FROM ALL LEVELS**

How your senior leaders demonstrate their commitment to compliance - not just through what they preach, but what they practice - will have a direct affect on employees’ perception of your company’s ethical culture. At a minimum, keep your leaders well-informed about your program; in best cases, they can be program advocates and stewards by endorsing and practicing ethical conduct.

Surveys continuously show that upwards of 80 percent of misconduct reports are reported in person, with a majority of the reports being made to direct supervisors. It’s important then, that you ensure:

- Your employees know and trust they can report issues to their supervisor;
- Those supervisors are prepared to receive and document those reports; and
- Managers understand your company’s stance on retaliation.

Supervisors that provide positive feedback for ethical conduct and who employees perceive to be ethical and fair are more likely to implicitly encourage employees to come forward with misconduct reports.

According to Mintzer, Rebekah, 48% of middle managers report that they’re only “somewhat active” in ensuring that daily decisions and behavior are in line with company values. Additionally, 31% report that ethics and compliance aren’t considered during their performance reviews.

Mintzer, Rebekah. “‘Tone From the Middle’ for Better Ethics and Compliance.” Corporate Counsel. 2015.

All this and more is why you must lean, and lean hard, on tone in the middle. You shouldn’t let a very busy - and potentially disengaged - Board affect the rest of the program (and all of your hard work). Strive to continuously communicate about compliance and engage mid-level and regional managers to jump on the bandwagon. Building and maintaining a strong compliance commitment on the front lines can lend itself to preventing noncompliance, regardless of what tone is coming - or absent - from the top.
Break out of the compliance silo and reach out to middle managers and the HR department that employees deal with most frequently. Directly engage the people most likely to be setting employee goals and receiving issue reports. They’re the most visible and effectual members of the compliance team you’ve got!

DEDICATION TO COMPLIANCE
Unless the tone is reiterated and strengthened at every level, compliance programs still will not be successful. A Board that is committed to ethical and compliant behavior will help the company as a whole make ethical strategic decisions – but it’s the middle managers committed to compliance who are going to influence ethical decisions on the daily and support a company-wide tone.

Amy Much, Director of Global Compliance at Under Armour sets the tone in the middle rather than the adage of setting it at the top. As a compliance professional, you’re no stranger to the fact that “tone at the top” is a key component of a successful compliance program. However, often times when you look for tone at the top, it is easy to forget that:

• It is difficult to find what truly influences others.
  If you’re relying on the actions of others for the success of your compliance program, you’re taking a big risk.
• The tone in the middle (compliance directors, front line managers) are just as important to the day-to-day success of your compliance program as those at the c-level.

Don’t get us wrong, we are not diminishing tone at the top, rather, we are emphasizing the importance for compliance executives, directors and managers to encourage tone in concert from the top while they actively work to set the right tone in the middle.

Amy Much, Director of Global Compliance at Under Armour prioritizes tone in the middle rather than the at the top. As a compliance professional, you’re no stranger to the fact that “tone at the top” is a key component of a successful compliance program. However, when you look for tone at the top, it is easy to forget that:

• It is difficult to find what truly influences others.
  If you’re relying on the actions of others for the success of your compliance program, you’re taking a big risk.
• The tone in the middle (compliance directors, front line managers) is more important and wide-reaching to the day-to-day success of your compliance program as those at the c-level or in the boardroom.
“More than half of respondents believe that top leadership values ethics and integrity over short-term business goals. Almost half of employees surveyed believed that the top leaders within their organization were unaware of the behavior that exists throughout the organization.”

KPMG, Integrity Survey, 2013, p. 14
“Everyone preaches tone at the top. You go to a lot of seminars about how to tackle various compliance issues and they all say tone at the top is very important, but you can’t find something that says how you infuse the tone at the top, how you change it, how you affect it. I do feel a little bit like I’m flying blind when it comes to how to answer that question. I’m attacking the tone at the middle and hoping to push up.”

- Amy Much
Director of Global Compliance, Under Armour
In ECI’s latest National Business Ethics Survey (NBES®), more than one in five workers who reported misconduct said they experienced retaliation in return.

Most organizations have a “no retaliation” policy, but have you ever sat down and asked how genuine it is? That is, do your employees know about it or does it just sit on a shelf and have little impact on what happens day-to-day in your organization. Here is Keith Read’s take on the topic, and a sample analysis you can conduct to determine policy effectiveness.

**SUCCESS TIP**

Ask yourself, “How do I know our anti-retaliation policy is working?” If the answer is, “I don’t know” consider going through Keith’s analysis that you can undertake within your organization. Gather data from your HR department and see what findings can help you improve your retaliation policy.
Retaliation can take many forms: at the organizational, manager and peer level, and involve both “hard” and “soft” retaliation ranging from discipline, dismissal and harassment through the more implicit loss of a whistleblower’s career trajectory and advancement opportunities. Whatever form, retaliation impacts the individual reporter and means that other people will think twice about blowing the whistle in the future.

When I examined whistleblower data as a CECO, I was looking for indicators of retaliation included:
- Annual performance reviews
- Raises
- Bonuses
- Disciplinary actions
- Career progression

I compared this data to the employee’s peers and it was immediately clear that retaliation was happening, albeit not everywhere and not affecting every whistleblower. Some individuals had been high performers prior to blowing the whistle; but their performance sharply declined afterwards, and, in some cases, never recovered. Based on my data, retaliation was linked most to managers and senior managers.

This analysis enabled me to discuss the reality of retaliation within our organization, and to heighten awareness of our monitoring of the issue. There is some evidence to show that retaliation lessened once that message had been circulated, though it admittedly can take years for a cultural pattern to emerge.”

- Keith Read
Convercent
PART IV: ANALYTICS AND BOARD REPORTING
Post case analysis: hotline reports and cases are a clear window into potential compliance program weaknesses – what don’t you know that you don’t know? By thoroughly documenting all parties involved, issue types and the program components, you can more easily uncover trends or identify compliance hotspots based on issue type, risk area, business unit, office location or any number of other variables.

Examine the impact, or lack thereof, of the following on your issues and cases:

- Policies
- Training courses
- Initiative engagement, completion, certification and/or attestation rates
- Risk areas
- Disclosures
- Compliance resources and staff
- Office locations
- Job titles
- Communication frequency

The most robust form of reporting is when you combine your compliance tools and data together to address risks, achieve your objective and measure your progress. Organizing data and performance metrics by your risk areas, gives all the information from the first three parts of this guide to provide critical context you need to truly understand and improve effectiveness.

By this point, your case management program is in place. You’re armed with the necessary data and metrics. You’re continuously making adjustments and improvements. Now it’s time to tell the Board how it’s all going. Are you panicking now or do you think you have it handled? How are you going to distill all that excellent compliance information you obtained in just a few slides?

To start, use our checklist, The Essential Presentation Planning Checklist, which highlights importance features of a compliance report and helps you focus on what to say and how to deliver the information. Download here.
REPORTING TO THE BOARD

In our recent study with Ethisphere, we found that every company we spoke with delivered some variation of compliance reporting on at least an annual basis. Overall, we found inconsistencies in the frequency of reporting, the information included in the report and the format in which the report is presented. It seems that nearly every compliance executive has his or her own idea of how to report on key compliance metrics, seemingly influenced by the politics of the Board and the leadership of his or her company.

HOW FREQUENTLY DO YOU DELIVER A FORMAL REPORT?

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<td>Quarterly</td>
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<td>Annually</td>
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<td>Monthly</td>
<td>18%</td>
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<td>Less than two years</td>
<td>5%</td>
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<td>Semi-annually</td>
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67% use Board communications to report compliance program statistics, but only 29% said the full Board receives the report.

---Compliance Strategy and Performance report 2016, Ethisphere and Convercent---
Don’t leave your Board guessing. They need to understand your company’s compliance program at the same level of detail they any other departments.

**WHAT TO COVER**

**Key players:** The key compliance actors within the company, as well as the reporting chain. If the compliance lead has direct access to the CEO and Board, say so (if not, you should arrange for such access and then say so).

**Incentives:** How compliance plays into executive and management compensation and incentives.

**Risk:** How the program covers the company’s high-risk areas at home and abroad. Make clear how these initiatives apply not only to employees, but also to business partners, vendors, subcontractors and third parties.

**Culture:** How the company is fostering an ethical culture and how leadership supports those efforts.

**Resources:** What you spend on the compliance program, whether that number is rising or falling, and why.

**Leadership:** What top management is doing to foster a culture of compliance and how the company is leveraging middle management – who, being near the front lines, are invaluable resources. ([See: Setting the Culture](#))

**Training:** What training programs are available for different types of employees and what internal communication strategies and vehicles are being used to keep ethics and compliance top-of-mind across the organization.

**Assessment:** The ongoing monitoring and auditing processes that assess the program’s effectiveness, including how periodic program reviews are done and how the program has been validated by an independent third party.

---

**SUCCESS TIP**

- Remind your Board about why they care.
- Coach your Board on what to look for.
- Deliver a regular and thorough report to the Board.
- Be prepared, be consistent and be efficient.
Response: The processes and communication lines the company has established to review compliance violations, how responses are calibrated and what measures have been put into place to stop it from happening again.

Open door: How you encourage employees to come forward with reports of misconduct (See: Reporting Channels) and how you disseminate your non-retaliation policy (See: Case Management). Tell the Board how your managers are trained to field employee reports, document alleged misconduct and move reports up the reporting chain (See: Escalation).

Planning: To wrap up, describe your plans for the compliance program during the year and beyond.

After completing the following exercise, you will be able to present the Board with actionable and insightful data. You will be able to complete this paragraph:

“Over the course of ____________ (time), we identified the following trends ____________. (trend 1, trend 2, trend 3, etc.). There were _______ (amount) of risk areas. This is how we are addressing the risks: ____________, ____________ (policies) and ____________, ____________ (trainings). These are how many issues related to these risks ______. Here is what we are doing to solve them: ____________, ____________, ____________ and ____________.”

Example: Over the course of 10 years, we identified....
RETRALIATION VERIFICATION EXERCISE
Mining this data will require you to gather intel from other departments in your organization – an emerging best practice for reconciling useful compliance data.

- We recommend sampling 7-10 reporting parties who blew the whistle at least a year (preferable two or more) ago to allow for enough time for changes in position, salary, etc.
- Compare the whistleblowers’ data to 5-10 peers who share their career path (position, tenure, experience, etc.)

☐ Schedule a meeting with your HR department to walk through this exercise.

☐ HR meeting is scheduled for ________________________.

Number of Direct Reports: ________________________

Overall Employee Review (Circle One):
Positive  -or-  Negative

Immediate Supervisor: ________________________

Number of Promotions/Demotions: ____________

Compensation History Trend:
At hire: ________________________
After blowing the whistle: ____________
Current: ________________________

Number of Disciplinary Reports: _____
When planning for the future, apply what you’ve learned from trend analysis of your case history to your organization’s strategic objectives below.

**Strategic Opportunities & Threats:**

- 
- 
- 

**Top Risk Profile Changes:**

- 
- 
- 

**New risk severity (impact + likelihood):**

- 
- 
- 

PART IV: ANALYTICS AND BOARD REPORTING
Top 5 Trends Facing Your Company:
1. 
2. 
3. 
4. 
5. 

Proposed plan of action and resources needed:

HAVING A STRATEGIC, FORWARD-LOOKING CONVERSATION WITH YOUR BOARD

• How much will it cost to make the recommended improvements?
  » What’s the bare minimum cost for “checking the box,” and what’s the cost of meeting current industry best practice?
• What will happen if we don’t make the adjustments now?
• What does success look like?
• What do you need from senior leaders and management for this to work?
• What are other factors that could affect these plans (market, enforcement, etc.)?
PART V:
HOW TO GET STARTED
We’ve covered a lot. And there are some things in this guide that can certainly take longer to address than others because they involve a fundamental shift in organizational culture or processes. It’s understandable to be overwhelmed, or tempting to be dismissive.

Change is rarely easy, and it never happens all at once. Here are some easy ways to get some early momentum, along with some tips for success:

PUT IT INTO PERSPECTIVE
This is one of the only direct lines your employees have to tell you about things that are going wrong. Invest in it. And remind your senior leaders and boards that if they expect you to keep their names out of the headlines, that you’re going to need a way to find out about the things that could put them there.

DON’T BOIL THE OCEAN
Start with your short- and long-term goals in mind and work all the way back to the tactical minutiae you can influence now. Want fewer anonymous reports? Look at known versus anonymous percentages to date, and set a goal for six months, one year then two years down the road.
Then look at the tactical things you need to do to make that happen, from the way you communicate about your hotline, to how you train your managers to handle in-person reports; and from secret shopping the experience an employee has with the hotline, to digging deep into employee data that could signal implicit retaliation.

**BE OPEN AND BE CURIOUS**
Hotlines are one of the most fundamental mainstays of corporate compliance programs, and it can be easy and all too tempting to dismiss any changes as too difficult or unnecessary. Today’s business environment, legal landscape and global workforce are incredibly dynamic—you can’t afford to rely on tools that are anything less than that. So ask questions about why things are the way they are and push back on resistance to change.

**CATER TO YOUR AUDIENCES EQUITABLY**
Evaluate your reporting channels, case management and analytics from the perspective of each of your stakeholders: employees, third parties (if they’re using the hotline), compliance/legal/HR admins and investigators, your executive team and your Board. What does each group need or want? And how do you make it easy for them to achieve their goals? The easier you make this for everyone, the more likely they are to do what you need them to.

**ASK AROUND**
The thing about hotlines is that (most) everyone has them. So give yourself a “support group” and find out what’s working and what’s not for everyone else.

**CALL IN REINFORCEMENTS**
There are people and companies that stand up and maintain hotlines for companies all over the world, on a daily basis (ahem). Use them and tap into the tried and true experience and results they’ve amassed by working with companies just like yours. It’s a heck of a lot faster, cheaper and painless than learning those lessons on your own.
CONCLUSION

There you have it - the steps to take to bring your compliance program from good to great. You are now armed with checklists, how to’s, reporting tips and conversation templates to start integrating into your program. We hope these resources serve you well as you begin to centralize and standardize incident intake, investigation and management at your organization.
Convercent’s risk-based global compliance solution enables the design, implementation and measurement of an effective compliance program. Delivering an intuitive user experience with actionable executive reporting, Convercent integrates the management of corporate compliance risks, cases, disclosures, training and policies. With hundreds of customers in more than 130 countries – including Philip Morris International, CH2M Hill and Under Armour – Convercent’s award-winning GRC solution safeguards the financial and reputational health of your company. Backed by Azure Capital, Sapphire Ventures (formerly SAP Ventures), Mantucket Capital and Rho Capital Partners, and based in Denver, Colorado, Convercent will revolutionize your company’s compliance program.

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