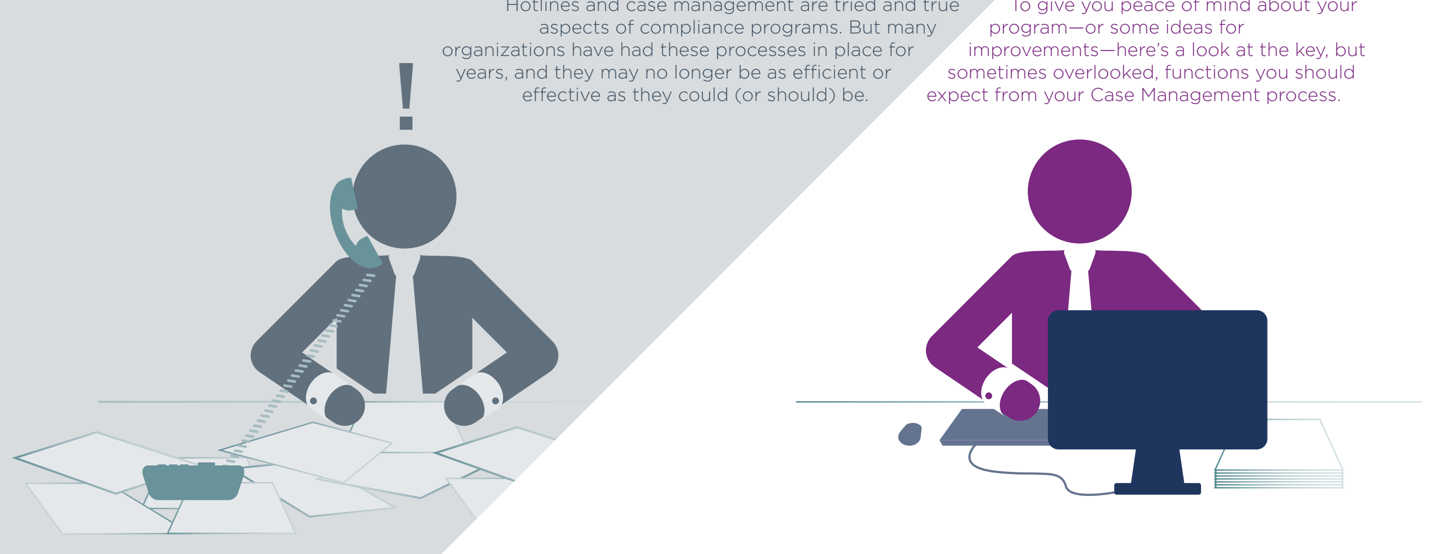
convercent™

WHAT IS YOUR CASE MANAGEMENT MISSING?

Hotlines and case management are tried and true aspects of compliance programs. But many organizations have had these processes in place for years, and they may no longer be as efficient or effective as they could (or should) be.

To give you peace of mind about your program—or some ideas for improvements—here's a look at the key, but sometimes overlooked, functions you should expect from your Case Management process.



REPORT INTAKE CHANNELS

When it comes to your incident reporting channels, two goals should rank higher than any others:

1 Make it easy for your employees to let you know what's going on.

2 Ensure reports are consistently documented and managed across all channels.

To maximize employee confidence and comfort when it comes to reporting, it's best to offer options, which may include phone-based, Web-based and in-person channels. Some companies also allow employees to send incident reports via email and SMS. While each reporting channel type has similarities and differences, they should all be designed and promoted alongside one another to encourage employees to come forward through whatever means they feel comfortable, and cohesively managed to encourage consistent reports, investigations, responses and analysis.

MUST-HAVE REPORTING CHANNEL FEATURES

HOTLINE

- Provide clear calling directions for every country where you have employees
- Offer it around the clock, especially if you're a multinational organization with employees around the world
- Have someone at the other end of the phone (voicemails won't make people feel like you take these reports seriously)—preferably someone trained to take and properly document these calls and conduct interviews
- Make sure callers are greeted in their local language—they'll instantly feel more at ease—and minimize the time they need to wait for a translator
- Accept anonymous whistleblower reports where legally permitted
- Let a reporter tell you what happened as soon as possible—burying them in legal terms, conditions and disclaimers may seem threatening, intimidating or arduous and lead to a high abandon rate
- Ask questions consistent with the web intake form to minimize report and data discrepancies across channels
- Give reporters a secure way to upload evidence or documents
- Make sure reporters know how to access their reports, supplement allegations, see the case status or view the case outcome once they've filed the initial report
- Secure a way for the company to request additional information from reporters—even the anonymous ones

WEB

- Make it look easy and non-threatening: heavy legal text (especially before you even get into the report), instructions in red or ALL CAP fonts or hard-to-follow forms can all decrease the likelihood or completeness of reports
- Provide pages and forms translated into your employees' native languages
- Offer anonymity where legally permitted
- Follow EU Data Protection laws where needed
- Customize your portal using company branding, photos and language from company leaders and employees to reinforce your commitment to an open and fair company culture
- Provide an easy-to-follow wizard that walks employees through the process and provides help text where needed
- Link to your company Code of Conduct and/or policies—especially the ones that reinforce whistleblower security, confidentiality and non-retaliation
- Give reporters a secure way to upload evidence or documents
- Make sure reporters know how to access their reports, supplement allegations, see the case status or view the case outcome once they've filed the initial report
- Secure a way for the company to request additional information from reporters—even the anonymous ones

IN PERSON

- Provide clear policies regarding the handling of in-person reports, including who can accept reports, how managers should treat reporters, questions to ask, information to gather and disclaimers to provide
- Set clear guidelines on the different definitions and protocol around issues related to compliance and HR
- Regularly train managers on policies, expectations and legal requirements around employee confidentiality, security and non-retaliation
- Make sure managers know where and how—and how quickly—they're expected to log proxy reports into your case management system
- Ensure all information from in-person reports contains the same data as other intake channels
- Give managers and reporters a secure way to upload evidence or documents related to the report
- Make sure managers can let employees know how to access their reports, supplement allegations, see the case status or view the case outcome once they've filed the initial report

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:

1 ORGANIZATION
2 HANDLING
3 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 various processes related to routing, communication, investigation and analysis, your team will have more time to spend in the field and better analytics on incident handling and trends. Not to mention that this can and will all lead to swifter and more consistent case resolutions—which will foster and fortify accountability, transparency and confidence in organizational justice within your company.

EFFICIENCY DRIVERS:

1 ORGANIZATION

TYPES OF ISSUES

There are two schools of thought to classifying issue types:

- Employee-driven classification means you pre-populate your intake channels and case manager with predefined issue types for employees to choose from, and the issue type drives the severity assignment and case routing.
- Compliance-driven classification is based on the idea that a member of the legal or compliance team is better qualified to determine issue types than employees. Only after a member of these teams reviews and categorizes each report type and severity based on the allegation is the issue routed. This may also help reduce the number of "junk" or extraneous reports you have to deal with.

COMPLEX ISSUE TRIAGE

Cases aren't simple or straightforward—a single incident usually involves several different people and issue types. Efficient Case Managers support multiple allegations (of different issue types), roles for different parties (such as reporter, witness and subject) and different issue priorities within a single case record.

FAQS AND Q&A

Give employees a place to get clarification or answers directly from the compliance and/or legal teams. This can help encourage dialogue and foster trust between employees and these teams, give employees clarity on murky or complex issues and reduce extraneous incident reports that don't need to be filed or reviewed.

SEPARATE CONFLICT OF INTEREST DISCLOSURES

Many companies use their reporting hotline and case management systems to record conflict of interest disclosures. To be brash, this is a mistake and could jeopardize the number or quality of reports you get. Disclosure management should be a standalone channel that's more inviting and easy to update on a frequent basis.

EFFICIENCY DRIVERS:

2 HANDLING

CASE ROUTING & ESCALATION

No matter how a report is made, it should be dispatched immediately. Your Case Manager should allow you to easily configure 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.

ONGOING COMMUNICATION

Ongoing communication with reporting parties—even when they're anonymous—is a critical, yet often overlooked, function of effective case management. Reporting parties should have an easy way to access, update and check on their cases, and administrators should be able request additional information from reporting parties and easily communicate with others on the team that have access to the issue. You can and should automate where possible: let reporters know when a case has been resolved or notify admins when cases are created or updated.

SYSTEM INTEGRATION

The more closely integrated your Case Management is with other systems, the greater efficiency and alignment you'll have. To start, your hotline and case management solution need to be intrinsically tied together for consistent handling and data. Next, integrating data from your HRMS system will increase efficiency and data accuracy by pre-populating employee data like names, departments and locations. Take things a step further by linking to your policies, training, risks and disclosures to give your cases richer context and help you spot compliance trends and hotspots.

EASY DOCUMENTATION

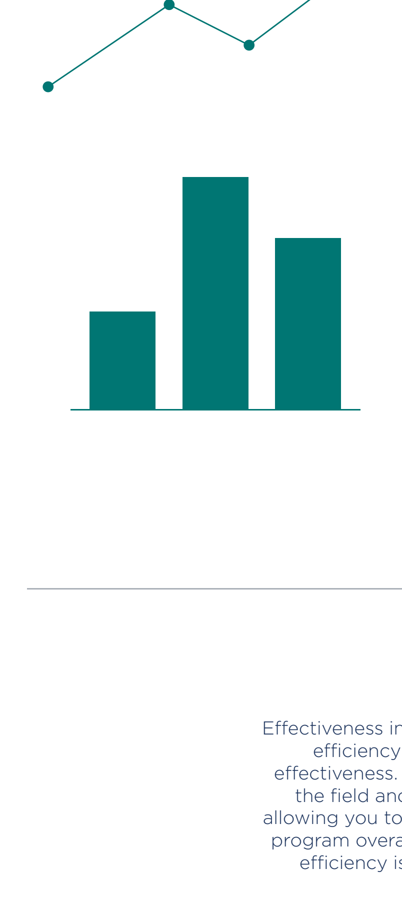
This is the digital age, which means no more passing around a bulky file folder. All your case documentation, communication, evidence, notes and summaries should be housed in a single location and attached to each case within your online Case Manager for easy reference, audit and analysis. Go one step further and make things even faster for case admins with drag and drop document attachments. Just make sure you're following corporate policies and local legal standards on document retention and data protection.

HIGHLY CONFIGURABLE

Businesses change all the time; your Case Management solution should offer agility that allows you to do the same. Adding office locations, employees, departments, issue types and users should be fast and easy to adjust. You can and should also empower employees to review, correct and update personal information or cases on their own. This will save your team from having to respond to these requests themselves, and can also drastically reduce the number of duplicate reports filed by employees who lost their login information or case number.

EFFICIENCY DRIVERS:

3 POST-CASE ANALYSIS



REPORTING

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 mentioned under "Handling: System Integration," 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.

IMPROVEMENT

While it may seem like a case is done once it has been resolved, there is so much more you can do with it—in a more efficient way than you previously were able. Take the information and insights you're now armed with and use them to evaluate and improve your overall compliance program. Look at case types and fluctuations as an indication of performance in other areas.

LOOK AT THE IMPACT (OR LACK THEREOF) OF THE FOLLOWING:

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

CONCLUSION

Effectiveness in a compliance program is critical, but employee engagement, insight and efficiency can be crucial drivers in your team's ability to manage and improve effectiveness. Bolstering these three elements can help your team spend more time in the field and on the front lines (instead of behind a computer doing admin work), allowing you to better address issues and their root causes and focus on improving your program overall. A logical way to start improving your team's engagement, insight and efficiency is to first make sure that the systems you rely on—including your Case Management solution—can support those goals.

Happy Managing!