

Version 02




Whistleblower Hotlines No Longer a Luxury



Society of
Corporate
Compliance
and Ethics

YOUR FACILITATOR

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Ms. Lowry has her Master's degree in Forensic Psychology, which includes extensive training and experience in clinical interviewing and conducting psychological evaluations. Her interviewing expertise include populations of criminals, severely mentally ill, and employees from a wide variety of industries and settings. She has specific violence risk assessment, de-escalation, and intervention training and a history of assisting organizations in

OBJECTIVES

- Quickly examine the myths of modern workplace misconduct and aggression
- Review the evolution and role of whistleblower hotlines
- Learn how modern whistleblower hotlines work
- Discuss why these tools are necessary and how they should be used
- Examine current best practices

"Educators must establish ways for students and others to anonymously report statements or conduct that worries them."

*The Columbine Report,
Governor Bill Owens
(2001)*



Requirements:

- Curiosity
- Open mind

OBJECTIVES

"Schoolplace violence is a term that refers to an assortment of behaviors that are intended to frighten, intimidate or harm, where there is a nexus between the perpetrator(s) and the organization or its employee(s) regardless of when or where the behavior(s) occur."

Only reason for human intra-species violence is to establish or reestablish control.



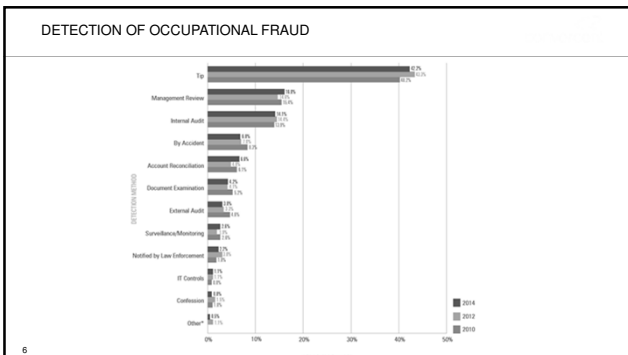
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PRE-SESSION ASSESSMENT

Most institutional misconduct is revealed by?

- a. tipster
- b. chance
- c. audit

5



PRE-SESSION ASSESMENT

Most tipsters request anonymity?

- a. true
- b. false

7

PRE-SESSION ASSESMENT

Monetary incentives increase the volume and quality of tips?

- a. true
- b. false

8

PRE-SESSION ASSESMENT


A tip which is anonymous usually cannot be acted upon?

- a. true
- b. false

9

COMMON MYTHS


We live in a culture of violence and no campus is safe
 Prevention is expensive and time consuming
 Having good policies and response plans is enough
 Predicting violence is impossible because those who are violence often just snap




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COMMON MYTHS AND FAILURE POINTS

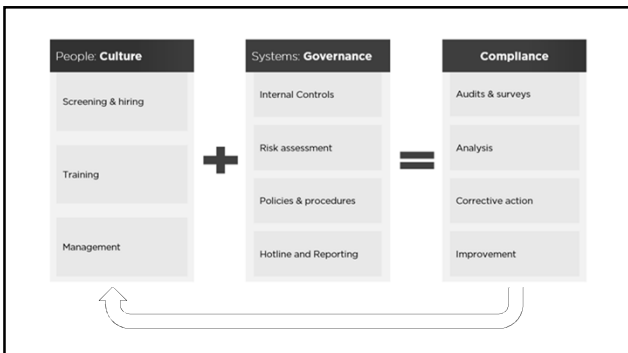
We live in a culture of violence and no campus is safe
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 Predicting violence is impossible because those who are violence often just snap




The lack of information and unavailability of actionable intelligence are the principle failure points in preventing schoolplace violence.



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MULTIDISCIPLINARY APPROACH




"The lower your expectations, the greater your disappointments."

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MODERN WHISTLE BLOWER STATUTES

False Claims Act 1863 (amended three times since 1986)
Title IX Civil Rights Act
Clery Act 1990
Violence Against Women Act (VAWA)
Campus Against Sexual Violence Elimination (SaVE) Act of 2013



Title VII and OSHA both have whistleblower provisions and protections.

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COMMON MYTHS

False reports are common and create liability
Users are distrustful and rarely make reports
Out-sourcing is expensive and unnecessary, "besides, our open-door policy does the same thing."
All anonymous incident reporting systems are alike.

15

COMMON MYTHS AND THE REALITY

False reports are common and create liability
Users are distrustful and rarely make reports
Out-sourcing is expensive and unnecessary, "besides, our open-door policy does the same thing."
All anonymous incident reporting systems are alike.

Most whistleblower complaints have merit
Most whistleblowers have more than one agenda
Most whistleblowers have done their own investigation
Most whistleblowers know their rights



16

THE NUMBERS

Bullying and student mistreatment most common complaints
<1 percent of all reports prove to be intentionally false
30 percent had previously reported by other means
55 percent declined anonymity
>85 percent used Smartphone or Internet to report

Most reports made after school
Ethics and code of conduct violations reported the least
Parents more likely to report using the Internet
Faculty rarely report



17

BEST PRACTICES

- 24/7 toll-free telephone, smartphone and Internet access
- Multi-lingual capability
- Permits users three levels of anonymity
- Early warning system; immediate distribution
- Document and image uploading
- Mechanism for follow-up and continued communication
- Automated report distribution and alerts
- Case management capable with customized, detailed reporting with metrics

18

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- *Policy and document search and download capabilities*
- *Policy attestation*
- *LMS*

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INTERNAL v. EXTERNAL

Relatively easy to launch
Initial small investment
Rarely trusted
Very difficult to properly administrate
Significant legal exposure
Security, scalability and sustainability issues

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INTERNAL v. EXTERNAL

Relatively easy to launch
Initial small investment
Rarely trusted
Very difficult to properly administrate
Significant legal exposure
Security, scalability and sustainability issues

Very easy to launch, maintain and secure
Small investment
Highly trusted
Very easy to administrate
Significant legal protections

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IMPLEMENTATION CONSIDERATIONS

- Report retention
- Confidentiality and discovery issues
- Vendor's skills, experience and reputation
- Publicity campaign



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REWARDS

- Diminishes trust and credibility
- Frustrates internal compliance and reporting efforts
- Diminishes sense of civic duty
- Causes a delay in reporting

Fear of retaliation primary bar to reporting, not the lack of rewards.

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WARNING SIGNS

- Low report volume
- Missing or incomplete reports
- Delays in receiving reports
- All reports anonymous
- Allegations seem to all point to one group or identity

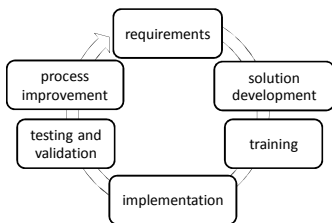
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LITIGATION AVOIDANCE

- Follow organizational policies and practices
- Retain all evidence and reports
- Document findings and actions
- Protect confidentiality
- Comply with the law

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IMPLEMENTATION



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PUTTING IT TO WORK

- Affirm new objectives and scope
- Appoint technical committee and chair
- Appoint working group
- Select technical resources (if necessary)
- Project plan
- Execute



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RESPONDING TO REPORTS



- Prioritize and assess urgency
- Perform proper "pre-investigation" investigation
- Initiate information gathering
- Verification and analysis
- Report finds and take appropriate action

28

CONCLUSION

29

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WHO WE ARE

Convercent completely redefines organizational compliance management. Its world-class software solutions allow organizations to align values and policies, educate and engage employees, ensure quick incident reporting and resolution, and monitor enterprise-wide performance, all in one integrated and secure cloud application.

Learn more at Convercent.com

30

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