

# Getting The Most From Your ~~Hotline~~ Helpline Program

Leveraging the Data to Gain Key Insights into Your  
Organizational Culture

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## Learning Objectives

- How your helpline program data can help you to understand the ethical culture of your institution
- Using the data to zero-in on hotspots and stamp out fires before they get too big
- Benchmarking your results against the industry to measure success and identify areas for improvement

## ABC Widgets, Inc.



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## Overall Report Volume

- Are people using the helpline?
- If so, to what extent?
- If not, why?
- Research and track anomalies

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## Report Rate per 100 Employees

- Volume per 100 Employees
  - If your organization has 25,000 employees and you receive 500 reports, this would equate to 2 out of every 100 employees reporting
  - $500/25,000 \times 100 = 2$
  - When compared to the benchmark we see that this institution receives more reports than the average. What might this mean?
- No or few reports at all
  - Why this is important?

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Report Rate	FY2015	FY2016	FY2017	FY2018	Benchmark
	2.2	2.5	2.4	2	1.4

*Benchmark source: Navex Global 2017 Ethics & Compliance Hotline & Incident Management Benchmark Report*

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## Substantiation Rate

- The benchmark average is 40% substantiated
- A higher substantiation rate can mean:
  - You are receiving a higher quality of reports from reporters
  - You have well trained investigators who are conducting better and/or more thorough investigations
- Below average numbers may indicate problems with one or both of the above or:
  - Maybe your program has not been socialized well or is in need of a refresh
  - Maybe there is an issue of improper use by employees
  - Maybe your investigative staff is in need of training
  - Maybe there is too much pressure being placed on speed as opposed to quality
  - Maybe you don't have a good e-forensics team

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Case Disposition	FY2015	FY2016	FY2017	FY2018	Benchmark
Substantiated	53%	57%	54%	49%	40%
Unsubstantiated	47%	43%	46%	51%	60%

*Benchmark source: Navex Global 2015 Ethics & Compliance Hotline Benchmark Report*

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## Reports vs. Inquiries

- Depends on how your particular program is set up
- Are your employees using the hotline to report allegations or ask questions?
- The cross-industry benchmark is 80/20 with 80% being reports
- The hotline (helpline) can be a very powerful and even more effective tool if it is also used as an avenue for employees to go to for help

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## ABC Widgets, Inc.

Reason for Contact	FY2015	FY2016	FY2017	FY2018	Benchmark
Reporting a violation, allegation or concern of wrong-doing	98%	95%	90%	88%	80%
Question or request for guidance	2%	5%	10%	12%	20%

*Benchmark source: Navex Global 2015 Ethics & Compliance Hotline Benchmark Report*

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## Anonymity Rate

- The benchmark average is approximately 70/30
- Why do employees choose to report anonymously?
  - Do not want to be a snitch
  - Do not want to get involved
  - Fear of retaliation
  - Feel their report may not be handled confidentially
  - Do not understand and/or have confidence in the investigative process
  - Assume nothing will be done and reporting is just a waste of time
- **Employee Trust**

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## ABC Widgets, Inc.

Report Type	FY2015	FY2016	FY2017	FY2018	Benchmark
Anonymous	23%	22%	18%	16%	61%
Named Reporter	77%	78%	82%	84%	39%

*Benchmark source: Navex Global 2015 Ethics & Compliance Hotline Benchmark Report*

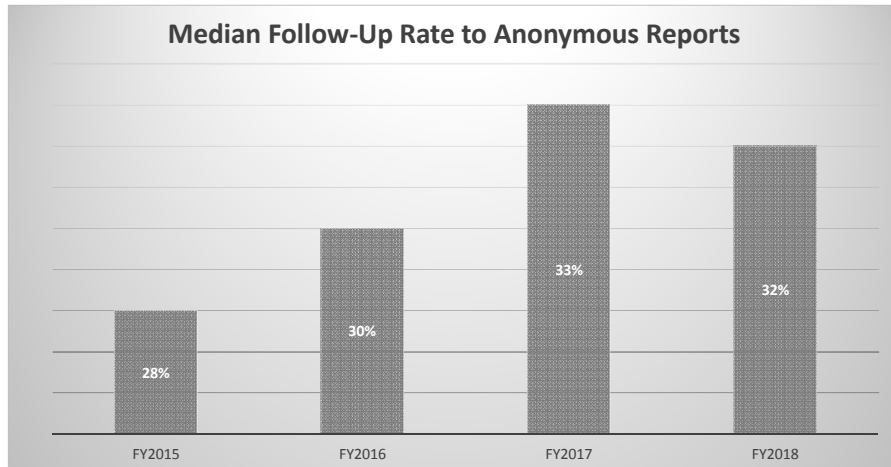
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## Reporter Follow-up to Anonymous Reports

- Follow-ups are critical for us to adequately understand and/or investigate the report.
- The benchmark shows only 30% of these reporters call back.
- If you are over 30% what are you doing as we all want to know?
- If well under the average why might this be?
  - Poor, inconsistent messaging about hotline program and how it works
  - Slow, delayed and inadequate acknowledgements
  - Could be a red-flag indicator with respect to culture

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## Reporting Method

- Phone
- Web Submission
- Other Methods – Intranet, mail, email, walk-in
- Why is this information important?

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## ABC Widgets, Inc.

Reporting Method	FY2015	FY2016	FY2017	FY2018	Benchmark
Helpline - Phone	45%	49%	53%	54%	32%
Helpline – Web Submission	24%	19%	20%	19%	23%
Other – Intranet, phone, fax, email, walk-in	31%	32%	27%	27%	45%

*Benchmark source: Navex Global 2015 Ethics & Compliance Hotline Benchmark Report*

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## Report Source

Where are your reports coming from?

- Employees
- Customers
- Vendors
- Other outside parties

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## ABC Widgets, Inc.

Report Source	FY2014	FY2015	FY2016	FY2017	FY2018	Benchmark
Employee	91%	89%	87%	90%	91%	94%
Customer	6%	8%	8%	5%	4%	1%
Other	4%	3%	5%	5%	5%	4%

*Benchmark source: 2006 Survey of Ethics & Compliance Officer Association (ECOA) Sponsoring Partner Members*

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## Report Type

- Standard allegation categories
  - Accounting, Auditing & Financial Reporting
  - Business Integrity
  - HR, Diversity and Workplace Respect
  - Environment, Health and Safety
  - Misuse, Misappropriation of Corporate Assets
- More specific breakdowns based on your needs/industry
  - Clery Act violations
  - FERPA
  - Title IX
  - Athletics Compliance

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## ABC Widgets, Inc.

Report Type	FY2016 (597 total)	FY2017 (634 total)	FY2018 (845 total)
Accounting or Auditing Practices	7 (1%)	2 (<1%)	4 (<1%)
Conflict of Interest	30 (5%)	9 (1%)	11 (1%)
Discrimination	12 (2%)	14 (2%)	20 (2%)
Environmental Health & Safety	4 (<1%)	6 (<1%)	2 (<1%)
Gifts	6 (1%)	3 (<1%)	9 (1%)
Harassment	58 (10%)	13 (2%)	12 (1%)
Misuse of Resources	36 (6%)	31 (5%)	14 (2%)
Retaliation	7 (1%)	6 (<1%)	4 (<1%)
Theft	2 (<1%)	3 (<1%)	3 (<1%)

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## Sanction Type

For those cases that are substantiated, what is the severity? What types of sanctions are being levied?

- Coaching/Verbal Warning
- Discussion Memo
- Written Warning
- Termination

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Sanction	FY2015	FY2016	FY2017	FY2018
Termination	31 (11%)	22 (9%)	13 (7%)	26 (10%)
Written Warning	71 (25%)	48 (20%)	27 (16%)	25 (19%)
Discussion Memo	154 (54%)	136 (57%)	109 (63%)	81 (60%)
Coaching	31 (11%)	33 (14%)	25 (14%)	31 (12%)

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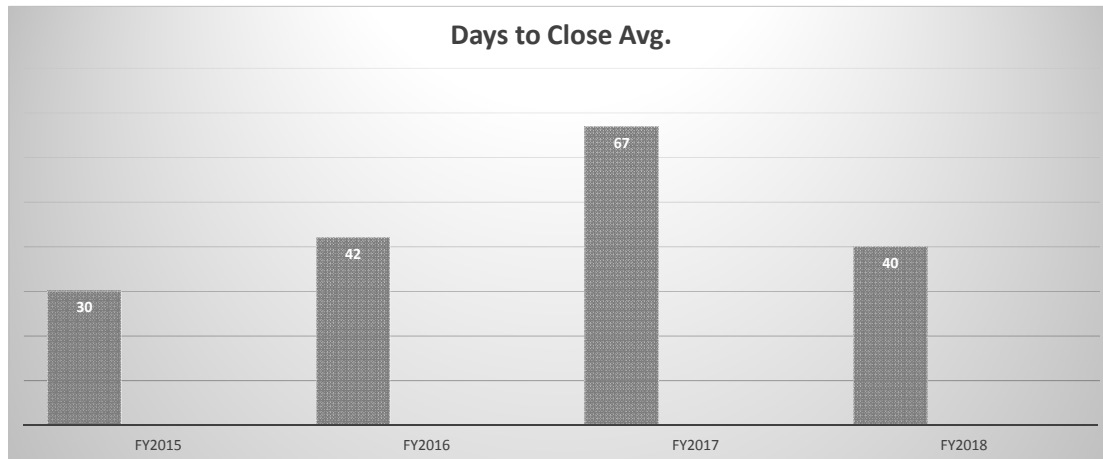
## Case Closure Time

- Benchmark average is 42 days
- Typically 30-45 days is seen as a reasonable time frame
- The longer it takes the more opportunity for a negative impact for all involved
- Longer time frames can erode trust in the system/program and ultimately quell future reporting

Benchmark source: Navex Global 2017 Ethics & Compliance Hotline & Incident Management Benchmark Report

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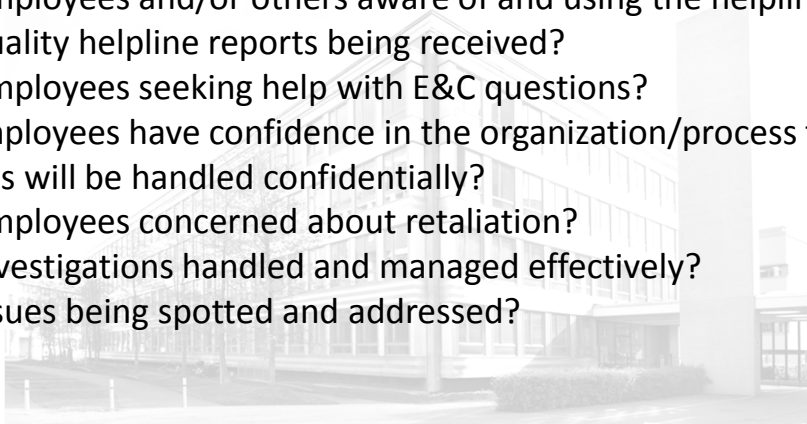
## ABC Widgets, Inc.



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## Thoughts about ABC Widgets Culture?

- Are employees and/or others aware of and using the helpline?
- Are quality helpline reports being received?
- Are employees seeking help with E&C questions?
- Do employees have confidence in the organization/process that reports will be handled confidentially?
- Are employees concerned about retaliation?
- Are investigations handled and managed effectively?
- Are issues being spotted and addressed?



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## Benchmarking Sources

- SCCE Compliance Effectiveness Survey
- Navex E&C Hotline & Incident Management Benchmark Report
  - 12,500 Global Clients
  - World's largest database of reports
  - 5,132 clients using hotline and/or incident management system
  - 38.5 million employees total
  - Generate nearly 1 million reports per year
  - Covering 26 industries and 45 sub-industries
- ECI's Global Benchmark on Workplace Ethics Report
- LRN Ethics & Compliance Program Effectiveness Report
- **Your own past performance**

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## Some Best Practices to Consider

- Use a good case management system
- Measure, track and report
- Keep it simple
- Use multiple benchmarking sources if possible
- Survey employee perceptions of your Helpline program
- Do periodic quality control check-ups
- Make sanitized results available to employees
- **Learn and share best practices!**

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Questions? Thoughts? Ideas?

**Thank You!**



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