Hotline: Implementation and Challenges
Amine Antari

Headlines

Corporate whistleblowing system, plea bargaining behind fall of Nissan’s Ghosn and others

Saudi king orders whistleblower protections in anti-corruption push

Barclays CEO Jes Staley faces fine over whistleblower incident
City watchdogs say he broke rules of conduct in his attempts to identify 2016 whistleblower
Why should future whistleblowers believe they will be safe?

Whistle-Blower Awarded $104 Million by I.R.S.

New Protection for Whistleblowers in Dubai
Written by Rebecca Ford and Nicholas Farganza
Trends and Statistics

Kroll 2018 Global Fraud Risk survey

In Kroll 2018 Global Fraud Risk review survey, **insiders** were identified as the main perpetrators of fraud, respondents also stated that insiders were the most likely to discover it.

Nearly half (47%) of respondents said that fraud was discovered by **whistleblowers**, 44% said it was detected through an internal audit, and 35% credited management with uncovering fraud.

Fraud was more likely to be identified by management within the company, according to respondents in the Middle East. More than half (54%) said that management had uncovered a fraud incident, compared with 38% who said that it was uncovered through an external audit and 36% who named an internal audit. The number of respondents who said fraud was uncovered by a whistleblower fell from the number one position in 2016 (50%) to the fourth (31%).

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Trends and Statistics

2018 ACFE Report to the Nation

*Graph and data showing trends and statistics on fraud.*
Implementation

Road map for a successful implementation

There are three steps in establishing an effective implementation framework for a hotline.

Identification

Roll-out

Selection

Implementation – Identification

Road map for a successful implementation

Depending on the size and complexity of the organization identifying the entity’s need for a hotline and implications of setting up the program is a key step in the process. Some of the aspects to think about:

- Internally managed vs External
- Cost
- Timeframe of implementation
- Reporting structure
- Local vs international coverage
- Stakeholders: Allegations, Reporters
- Technological and legal requirements
- The extent of use
- Type of information to be collected
Implementation – Selection

Road map for a successful implementation

- The selection process for a hotline should involve representatives from various departments that are directly or indirectly impacted by the implementation such as: IT, Legal, Training, User, Investigation/Internal Audit, Compliance, HR. Some and preferably all of these representatives should be part of the selection committee;

- If a system is to be selected, detailed requirements should be submitted to potential service providers and a set of criteria should be determined. The following criteria are examples that should be taken into account:
  - Data import mechanisms
  - Reporting capabilities
  - Level of interactions with the whistleblower
  - Costs: Implementation, maintenance and ad-hoc
  - Timeliness of response and support service

Implementation – Selection (continued)

Road map for a successful implementation

- Expertise/Experience of responders
- Type of hotline channels: Phone, website, mobile app
- Accessibility: Timing and geographical

- Roll out plan is to be established and once the service provider is selected. Regular meetings during the roll out phases should be organised with the various stakeholders;

- In case a service provider is being changed, additional considerations should be taken into account such as data transfer and related quality, transition period, use of similar numbers, level of support by current service provider
Implementation – Roll-out

Road map for a successful implementation

A hotline requires a proper launch in order to be truly successful. Communication from top management about the program’s goals and objectives will set the tone for the hotline.

- Awareness and training
- Escalation protocol
- External Reporting: regulators, external auditors
- Data security and retention
- Documentation and materials update

Other considerations

Road map for a successful implementation

- Tone at the Top and Management support
- Establishment of related policies: Hotline, retaliation
- Program effectiveness testing
- Collaboration with investigation processes
- Incentive vs Duty to report
- Independence and Credibility
- Fear of Abuse
Amine Antari
Managing Director
Business Intelligence and Investigations
amine.antari@kroll.com

Office 701
Level 7, Liberty House, DIFC
PO Box 508828, Dubai, UAE
T +971 4 4496720
M (UAE) +971 50 3204402
M (KSA) +966 54 1093437