



SIX STEPS TO AN EFFECTIVE INTEGRITY LINE

Building a speak up culture

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First, let's consider why a healthy speak-up reporting volume is important. The existence of a strong speak-up culture is widely accepted as fundamental to any compliance and ethics program. In addition to being legally required for many organizations, it is accepted as a key component of delivering a transparent culture with a strong sense of organizational justice and accountability. A **recent study** clearly identified the correlation between whistleblower report volume and business health.

What can you do to raise the number of reports you receive and ultimately build a stronger speak-up culture across your organization? It all depends on what is at the root of the problem. Common causes for suppressed reporting include:

- Lack of awareness that a hotline exists and why
- Fear of retaliation
- Reluctance to “tattle-tale” or “snitch” on colleagues
- Skepticism that a report will lead to change

So, what can you do to counteract these factors?

1. Step 1: Conduct a listening exercise

01. Use simple analytics to identify where reports are coming from – and are not coming from. It is possible that your problem is companywide, but more likely that you have pockets of silence. Several of our customers have used their analytics to find those areas where the speak-up volume is lower (using internal benchmarking).
02. Sometimes managers and supervisors will – wantonly or misguidedly – say things such as ‘Don’t contact the hotline, we deal with any issues ourselves’. If the analytics show low or no reports from certain countries, regions, divisions or plants, then use the analytics as an alert to investigate, understand, and re-double communications. It may be that there are genuinely no issues to report, but it could be that reports are being suppressed, for a host of reasons.
03. You can also compare your reporting rates to other organizations’ experience using a benchmarking application (external benchmarking). This will show you if the speak-up volume you are experiencing in certain countries or working environments is in line with societal trends, or if you have a unique internal challenge. It is important to understand where you have opportunities to improve the speak-up rate before you dive into understanding why you have these challenges.
04. Through one-on-one interviews, workshops, surveys, and compliance program data, try to hone in on the exact reasons people are not speaking up through your hotline: Do they know it exists, is it readily available to them, do they fear repercussions, do they trust the anonymity of the service, do they trust the organization to take them seriously and investigate and act, do they believe that raising a concern is the right thing to do?

2. Step 2: Raise awareness

01. Make your hotline approachable. Give it a brand. For example, “Talk to Peggy” or “Ask Veronica.” This humanizes the hotline, gives it an approachable face, and reduces the fear of communicating with a nameless agency (see Step 4: Address fear of the unknown).
02. Hang posters around the office (most commonly in bathroom stalls, as they are private), with tear-off phone strips. Tear a couple of the numbers off, so people perceive that their colleagues are engaging.
03. Produce a credit-card-sized reference for people about the hotline (analysis shows that the resulting retention and awareness rates are very high, for a modest investment).
04. Include hotline details on employee pass cards, identity cards, and the like. Lanyards, pay slips, and stickers inside company vehicle windscreens/windshields are further examples of reminders that will be seen regularly and are inexpensive.
05. An example of tailoring your awareness program to your audience: for manufacturing or factory workers, put the hotline message on a lens cloth—something that they will use several times each day to clean their safety glasses.
06. Some statutory documents will often have to be posted to employees at home; include hotline information in those types of periodic communication, where their surroundings will likely mean that they are more relaxed about reading it.
07. Create a digital presence where you can promote your ethics brand and host information on the hotline and retaliation policies (e.g., EQS’ Compliance and Ethics Portal)
08. Send periodic and regular emails promoting the ethics program. Highlight specific areas of ethics and compliance in each email so they are different and interesting.
09. Use stories to engage people. Ideally, tell anonymized stories of events that have happened in your organization: investigation outcomes, examples of misconduct, etc., so people can grasp the tangible impact of ethics and compliance.
10. Use ‘nudge’ techniques to make the hotline message more compelling. Rather than saying ‘contact the hotline’ use ‘contact the hotline – other people do’ or ‘contact the hotline – your colleagues do’. This can result in double-digit improvements in reporting levels.
11. Supporting phrases such as ‘Don’t be a bystander’ and ‘If it concerns you, it concerns us’ can prove to be very compelling and, again, deliver valuable improvements in reporting levels.
12. Use stories to highlight whistleblowers in a positive light (not by name). But express how they saved the organization from regulatory punishment, customer loss, wastage, fraud etc...
13. Embed videos in your ethics portal and link to them in your emails. These videos should include business leaders speaking to the individual’s responsibility to report concerns. Change the tone from asking people to speak up to requiring them to speak up. This helps to mitigate their internal debate of whether they are doing the right thing. You remove the decision paralysis by requiring the action.

14. With so many people working from home, think about how you can use technology to get your message in front of employees. We have seen customers have IT insert an ethics message into the screensavers and wallpapers on employees' computers.
15. Use workshops: arm team leaders with materials to host workshops with their teams. Have them discuss the types of concerns that should be raised to the hotline. Make it fun and engaging.
16. The EU Whistleblower Protection Directive (and some other laws) already require companies in their jurisdiction to support hotline reporting from a vast array of people, not just employees. For example, reports are accepted from people who went through the recruitment process but never joined the company, leavers, suppliers, vendors and even supporters of whistleblowers (such as family members) who have no direct relationship with the company. Consider how to address this type of third-party requirement including, say, a hotline link within supplier and vendor portals.
17. Recognize that Covid-19 and working from home may have affected hotline awareness and reporting metrics, particularly as people became increasingly concerned about keeping their jobs. Use return-to-work-type communications, reminders and briefings (including Zoom/Teams) to raise hotline awareness.

3. Step 3: Address 'Fear of the Unknown'

01. Making a hotline report can be a big step for people, and they will invariably be fearful of the unknown – such as “What will happen?” and “Who will know?” Every question like this can result in people deciding not to report, so addressing their ‘Fear of the Unknown’ can be crucial.
02. Use reassuring imagery (of cats, dogs, people, etc.) in hotline awareness campaigns to familiarize people with the hotline, whilst also subliminally reassuring and calming them.
03. When launching the hotline (and periodically thereafter), run a simple competition that invites everyone to make a simple first report—on canteen food, for example. Everyone who does so is entered into the competition with the possibility of a prize. In this way, people gain familiarity and even if they don't participate, they still gain understanding and awareness for any future, serious reporting.
04. Explain the terminology— ‘confidential’ and ‘anonymous’ etc. can be confusing, and confusion can result in concerns which again lead to people deciding not to report.

4. Step 4: Address fear of retaliation

01. In all communications, emphasize the absolute protections of anonymity and confidentiality.

02. Promote the perception of organizational justice. People must believe that the company treats all people equally. Executive or high performers must be seen to be held to the same standards as everyone else. Tell stories (anonymized) about how high performers have been held accountable for transgressions.
03. Communicate the absolute nature of your anti-retaliation policy. Share visibility into some of the checks and balances you monitor for retaliation. • In workshops, have local leaders reinforce the message that retaliation will not be tolerated.
04. Follow up with reporters regularly after their report to provide support (aka 'Report & Support') and identify whether they have faced retaliation (some retaliation can be subtle and undertaken over time).
05. Use simple analytics to see what happened to their career, pay, shift allocation, etc. post-report, and use this in the follow-up.
06. 6% to 10% of retaliation occurs more than 6 months after the report, so reporter support is not a 'once-and-done' activity.

5. Step 5: Address cultural barriers to whistleblowing (For example: "We do not do that here.")

01. Some cultures and countries have a history where informers were regarded as anti-social, collaborators with occupying forces, or similar; for example, citizens of many European countries developed strong perspectives on reporting in the wake of World War II. Citizens of these countries continue to have an aversion to whistleblowing. To overcome this, share messaging from team members and executives promoting the hotline. The message can be about protecting the company. It is not about the one or two people that are involved in the transgression; it is about the thousands of people whose livelihoods would be threatened if the company suffered a setback by the actions of the few bad apples.
02. You should also communicate examples of how people speak up so that it is not seen as abnormal or isolated. One example would be to share the results of an employee survey, e.g., 90% of our employees said that if they saw something out of the ordinary, they would report it. Or share hotline metrics, e.g., we have 50 concerns raised through the hotline monthly.
03. Reinforce messaging about the purpose and values of the company. The hotline is here to protect that purpose.
04. Have local leaders use workshops to raise awareness of the importance of raising concerns. Give them tools like **Giving Voice to Values** for the teams to exercise and practice the behavior.

6. Step 6: Ensure employees know their concerns will be taken seriously

01. People often do not report concerns because they do not believe that their concerns will be addressed. This can be mitigated by sharing stories in your monthly newsletter of how cases have been investigated and involved parties held accountable.
02. Investigate cases efficiently and inform the reporter of progress and conclusion (at an appropriate level). This makes the reporter feel that their concern is being taken seriously, and they will share this within the organization. Build a reputation for caring, efficiency, empathy, and confidentiality.
03. It can be worth testing and analyzing what happens after a report has been received, including the 'tone' and perception of subsequent communications and interactions. These can make the difference between a 'widely regarded' hotline and a 'going-through-the-motions' hotline, with all the consequences for future reporting levels that will bring.
04. Annual (anonymized) compliance and ethics reports can have a key role here, with a hotline/discipline-related subset published internally that shows reports are investigated, and actions taken up to and including dismissal/termination.
05. Use many of the practices stated above in raising awareness, as they will reinforce the importance of reporting concerns.