

7 Steps to Communicating a Whistleblower Hotline



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The Importance of Communicating Your Policy

If you have a whistleblower hotline, you want to make sure that all your stakeholders know that it exists, and that they understand how and when they can and should use it. This starts with communicating your whistleblower policy company-wide. You've taken the time to put a whistleblower hotline and policy in place to promote your organization as a responsible employer who values its employees. But if your employees don't know about the program, how can it be effective?

In order for your whistleblower hotline and program to be effective, it must have the commitment of top management and leadership and must be effectively communicated to everyone. Your whistleblower hotline was put in place as a crucial tool to help uncover serious problems that may be happening under the radar in your business. So, make sure your employees know that.

Ensure your employees understand that your whistleblower policy is in place to help prevent

retaliation for expressing concerns when using your hotline:

- Communicate zero tolerance for any type of retaliatory or discriminatory action.
 Retaliation to any complaint is prohibited and could result in serious disciplinary action
- Communicate zero tolerance for discussing discrimination allegations with each other.
 This could result in unintentional additional retaliation.
- Communicate continued support to employees after they have fled a complaint.

One step where whistleblower programs tend to fall short is in the communication process. The communication phase is where you can sell your program and help employees understand why it's there, and how it can benefit not only them, but their colleagues and the company.



Understand Your Audience

The first thing you need to do is understand who you're talking to. Your audience. Your diverse group of employees and stakeholders. For some, this will be their first experience with this type of speak-up culture and program. What you don't want to do is scare them into not feeling safe to voice their concerns.

A great place to start is to ask your employees some questions:

- · Are your employees aware of any existing corporate values or policies? You can use this information to help them relate to your whistleblower program and hotline
- How do employees currently seek information and communicate? Either via email, intranet, face-to-face meetings, etc.?
- other Have communication strategies worked well in the past? Were others not as successful in getting attention?
- How detailed or granular do you need to get with information? Some employees just need a simple message. Other may require more specifics and structure.





For some, this will be their first experience with speak-up culture ...

Step 1 - Understand Your Audience

Let Employees Know What's In It For Them

You've taken the time to understand your audience and how to communicate your message. But employees may still ask, what's in it for me? Messages from upper management tend to be very 'top down' and instruct employees what is expected of them much like an order. Quite often employees may ignore this. How do you sell your program in a way that makes employees feel good about using it? Once you understand your audience, you'll know the best way to tailor your message to fully engage them.

There are different ways to get your point across by using positive reinforcement:

- Being Compassionate "We value your thoughts and concerns and understand that speaking-up can be hard to do. We want to make it easier and safer for you by providing this whistleblower hotline."
- Express Company Growth "Our company is growing fast, therefore, we require processes and policies to help manage this growth. This is why we want to provide you with a place to speak-up anonymously and safely about any concerns you have."
- Promote Improvement "We've had some issues with misconduct in the past, and as management, we're committed to improvement and need your help. We're providing this hotline as a way for you to safely speak-up about any wrongs you see."
- Reiterate Corporate Values "We are all responsible for living up to our shared corporate values, and that includes leadership. This hotline will allow you to safely and anonymously speak-up when these values are being ignored."



Communicate Anonymity

Anonymity is key, and it's important all stakeholders understand they can choose to be anonymous when they speak-up and use your whistleblower hotline. You might think you have an open-door policy but do employees really feel safe bringing concerns to their supervisors.

Consider this. Many times, managers are nervous about being blamed for misconduct that may be happening. And imagine how a whistleblower could feel when reporting sensitive information. They may be worried about being found out, or worried about what their colleagues will think. The employee may also be worried about retaliation and may be concerned about working with the person or people he or she reported about. This is why it's crucial to reiterate the safety and anonymity of your whistleblower hotline.

Anyone filing an anonymous report should have confidence in their anonymity being preserved because they know that the reported information, and their identities, will not be revealed. Having a sense of security in reporting misconduct can promote a culture of open and honest communication within the organization.

As well, it can establish a deeper level of trust with management by knowing that they not only take compliance concerns seriously, but they are equally serious about preserving the integrity of their reporting employee.

* In some countries, whistleblowers are not permitted to be anonymous. Your whistleblower program should adjust to this requirement when needed.



Step 3 - Communicate Anonymity

Onboarding New Employees

An important step to making your whistleblower hotline work is to ensure that all new hires know that it exists, and how you intend for it to be used. This type of communication should happen very early into the new hire's first days into the company. In other words, you could potentially be sharing your program many times during the calendar year, but it is important that you don't wait until the employee has been in their position for too long.

As a manager, this is your time to truly share what your company's vision, mission, and values mean to you, and how your new hire can embrace these attributes into their new role in the company. As new employees come on board, one of the first things they should be made aware of is the organization's whistleblower policy and how it positively fits into the organization's culture. Employees need to know that it is their duty to report possible wrongdoing within the organization and they also must trust that their concerns are taken seriously and investigated.

Make this time for onboarding count! Oftentimes, new hires can experience badly executed onboarding situations that can make them conclude that you and the organization is poorly managed. This is a time when your new employees may be prone to jumping to premature conclusions about the company's culture. Take this opportunity to prove everything you say, and prove what the company believes in.

You never get a second chance to make a first impression. Focus on these key components during the onboarding process

- Teach new employees about compliance related issues including legal and policy related issues.
- **Clarify** with new employees how their role fits in with the company's expectations.
- Expose your new employees to the company's culture and organizational values.

(source SHRM)



Training Employees on Your Program

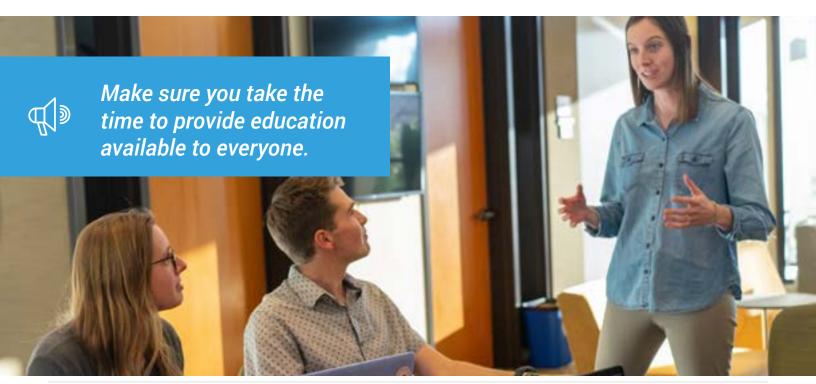
Employees need to know where and how to report any wrongdoing. Training all stakeholders helps reduce the "we were never told that' excuse. Education should focus on teaching what types of unethical activities are appropriate for reporting, and those that are not.

Make training relatable to all stakeholders because if you have a global footprint, you will have a diverse group of employees with differing cultures, language barriers, and education. Make sure you take the time to provide education accessible and available to everyone.

e-Training options offer a flexible and easily accessible way to share knowledge about your whistleblower hotline. e-Training offers knowledge transfer through the internet, from anywhere, so your globally located employees can learn in their own time. e-Training allows you to train all your employees or stakeholders on how to use your hotline.

Gamification is another option to reach globally located employees. Using gamification for learning is an educational approach to motivate your employees and other stakeholders to learn about your whistleblower hotline and compliance program by using elements such as video games, or online applications. Gamification can bring a unique learning element into your workplace and adds fun and engagement through capturing the interest of those who are learning.

Remind employees about the training options and your company policies in a company newsletter or conduct a lunch and learn where you talk about sanitized cases and get your team to role play. Any opportunity to talk about your program, company policies, and workplace culture helps reinforce the company's commitment to making your hotline work.



Posters and Other Visuals

Visual communication can be just as effective as verbal communication, in fact maybe more so as visuals generate emotions. And one thing humans like more than visuals are the emotions they elicit. People use emotions to survive, thrive, make better decisions, and understand our surroundings.

Visualization works because humans respond to and process visual data better than any other type of data. Here's a fun fact - the human brain processes images 60,000 times faster than text, and 90 percent of information transmitted to the brain is visual! We know we're visual by nature so why not use this as a way to communicate organizational information to employees, like a whistleblower policy and hotline.

You can do this by using custom program materials like posters and employee issued wallet cards

to promote your whistleblower program across the organization. Another way to visualize your intentions and get the point across is by using a custom hotline landing page. This is a great way to promote your program and add to its credibility and reinforce your company's commitment to providing a speak up culture.

Both physical materials and a custom landing page provides your organization with a visual opportunity to promote your whistleblower program and hotline using your brand colours, logos, and copy that reflects your vision, mission, and values. These are places where you can showcase your intentions and really reinforce your desire to ensure you have a program that all stakeholders feel good about using.

(source **Thermopylae**)



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Differentiate Ethical and HR Issues

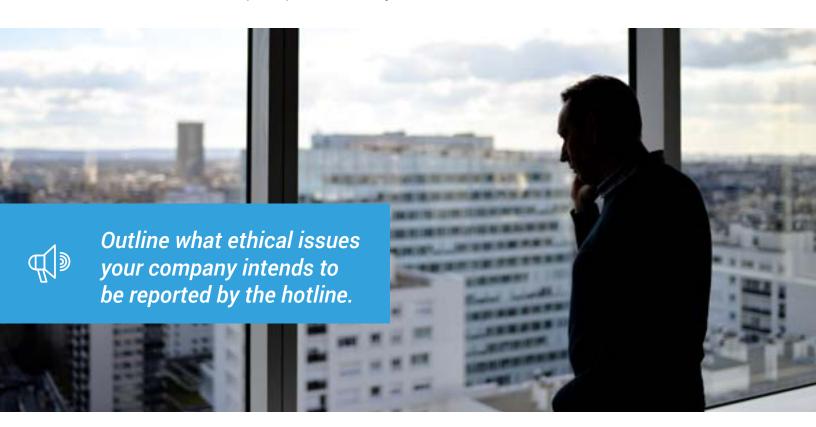
One fear shared by management everywhere is that a helpline will be abused by frivolous reports. But with the right education, your helpline won't overflow with everyone complaining about everything. Diligent training can help reinforce exactly how your company intends for everyone to use your hotline.

Employees should know the difference between an employee relation, or HR issue and a true ethical dilemma. An effective whistleblower policy should outline what ethical issues your company intends to be reported through your hotline. At the same time, employees should also know whom to turn to in the organization to express their concerns about any perceived employee HR issue.

Workplace conflicts can involve competing core values, perceived inconsistencies between actions and values, or varied perceptions of reality.

Therefore, it's a good idea to conduct regular audits of your hotline to determine how it's being used, what is being reported, and how often. For example, if a smaller company is receiving an unusual number of calls relative to the number of employees, perhaps the hotline is used to report HR concerns instead of ethical breaches.

When creating your whistleblower policy, consider your existing corporate culture. Ask the question, "is there an opportunity to enhance it"? Has your organization historically had a culture where employees feel unsure about speaking up? Use this opportunity to improve the level of expectations and adherence to your corporate culture that employees have. As well, train and educate your stakeholders on when and how to use the helpline.



Summary

Your intentions are only as good as your employees understanding and accepting of them. Communication is where many intentions get lost and plans and objectives struggle to gain traction. When your entire organization is needed to make your whistleblower program a success, if there is insufficient communication, then employees won't make reports and management won't know what's happening. The wrong communication creates confusion and potential misuse of your program. Or no use at all.

When you've successfully communicated your program, you'll start to see buy-in from employees and trust of your program. When the program results in positive benefits, employees will feel their organization follows through on its values.

Allegations of wrongdoing are going to be made. What's important for the organization is that it implements a mechanism for individuals to come forward and anonymously communicate any suspicions they have of wrongdoing and illegal acts that can harm the organization.





Summary