

INTRODUCING A WHISTLEBLOWING HOTLINE: A GUIDE FOR EMPLOYERS

Your basic guide to introducing and maintaining a whistleblowing hotline for organisations based in Asia Pacific.



Whistleblowing hotlines have become more popular over the last decade since the introduction of new anti-corruption, data privacy and employment laws across the world.

WHAT IS A WHISTLEBLOWING HOTLINE?



A whistleblowing hotline is a service that allows employees (and sometimes third-party suppliers and families of employees) to report concerns about malpractice or unlawful or unethical conduct in the workplace. Implemented correctly, whistleblowing hotlines are powerful tools for exposing fraud, bullying, malpractice, discrimination and more.

What does a good whistleblowing hotline look like?

A well-managed hotline is compliant, accessible, free of charge at the point of use and inclusive. Ideally, employees should have access to the following:

- → A secure, easy to use, and independently managed, internal reporting process
- → 24/7/365 accessibility
- → The ability to use the hotline free of charge
- → Choice of reporting via telephone, mobile, on-line or in-person
- → The option to report in the user's native language
- → Confidential and anonymous reporting options

The growing role of whistleblowing hotlines in Asia Pacific

Whistleblowing hotlines have grown in popularity but initially found favour among ethically progressive organisations – particularly those that recognised the value of encouraging employees to 'speak up' about unethical practices within the workplace.

The long term benefits that employees, leadership and shareholders have gained by having a strong workplace culture has encouraged more organisations to ensure they have an effective whistleblowing process in place.

Responding to legislation

Over the last decade whistleblowing hotlines have played an important role in Asia Pacific thanks largely to several key pieces of legislation including the whistleblowing laws established in Australia, Japan and Malaysia that have introduced significant penalties, as well as the developments in anti-corruption legislation in Singapore, Hong Kong, and again in Malaysia and Australia.

With data privacy, fraud, corruption, modern slavery, bribery and discrimination all important compliance issues, this type of legislation is establishing required procedures for organisations to effectively manage employee concerns, and in particular to protect whistleblowers against retaliation, paving the way for more widespread adoption of hotline services within the Asia Pacific region.

THE BENEFITS OF HAVING A WHISTLEBLOWING HOTLINE

An effective hotline promotes an open, honest and accountable culture where employees can express their concerns without fear of reprisal.

A whistleblowing hotline can:



help identify risks the company may not be aware of



help your company comply with its **legal and** regulatory responsibilities



give senior management an opportunity to address wrongdoing swiftly and take remedial action, potentially limiting damage to the business



help strengthen your investigation processes



encourage employees to speak up if they have concerns



demonstrate your company's **zero-tolerance approach** to malpractice and wrongdoing



offer **an alternative route** for employees who feel they cannot speak up internally



promote a more open workplace culture

Research shows the more reports a company receives through its hotline the better its financial performance.

PLANNING AND IMPLEMENTING A WHISTLEBLOWING HOTLINE

The scope of a hotline will depend on the size of the business, the nature of your operations, the company's risk profile and its global reach.

Objectives and remit

Your organisation will need to be clear about what role the whistleblowing hotline is intended to play, and what types of reports can be made through the whistleblowing hotline. This may be defined by laws or regulations applicable to your organisation. Along with other important details, this information should be included in your whistleblowing policy.

Organisational considerations

Some organisations have a whole department responsible for internal audit, compliance and ethics-related activity. Others may simply have only an ethics champion or it may fall under the remit of human resources.

You will therefore need to establish who will be responsible for the oversight and management of your whistleblowing hotline process and how it will fit with existing policies and procedures.

With multiple stakeholders involved, you must ensure all parties are engaged and understand the importance of their contribution to the success of the hotline.

Are there any trade unions or works councils you need to engage with? In some countries this is a legal requirement while in others it's good practice to explain the purpose of the service and how it benefits everyone.

Geographic and language considerations

If you have employees or suppliers based overseas, you will need to consider how they will access and use your hotline. Think about what languages it will need to support, if interpretors and translation services are required, and if availability to the hotline is needed across different timezones.

You'll need to take account of international laws surrounding whistleblowing, data protection and privacy, which can vary from country to

country and are subject to change. Cultural differences and sensitivities that may affect the understanding, undertaking or acceptance of the service must also be considered.

A decision will need to be made about whether the whistleblowing hotline should be rolled out centrally or governed by individual countries or sites. Whatever you decide, responsibilities and roles need to be assigned and clearly communicated.

Overcoming barriers to reporting

It will be important to think about other factors that may deter staff from raising concerns - and look at ways in which they could be overcome.

These may include a lack of knowledge about what constitutes a 'valid' report, or how reports should be raised – both of which should be addressed by a comprehensive communication campaign (see 'Promoting your whistleblowing hotline').

You should also be aware that many staff will be reluctant to make reports if they feel they will be at risk of exposure and retaliation.

Make sure your hotline is secure and all reports are kept confidential. Provide anonymous reporting options and have clear processes in place to foster trust among employees and to protect them against any form of retaliation when they make a report.

Accessibility will be important too, so Freephone or toll-free numbers and web reporting options should be made available as part of the service. A decision will also need to be made about whether the hotline service should be extended to suppliers, clients and third parties.

PROMOTING YOUR WHISTLEBLOWING HOTLINE

Communicating effectively about your whistleblowing hotline service is vital. If information and service procedures are buried within policy documentation, the chances are your employees aren't going to find it when they need it.

Here are a few suggestions that may help you come up with your own ideas for promoting your whistleblowing hotline.

Supply information to employees at their induction. Include details about the whistleblowing hotline and how it fits in with company policy, how to access the service, the types of reports accepted, available hours and what colleagues can expect to happen after making a report.

Ensure management and stakeholders are fully trained.

This will improve the channels of communication throughout the organisation, helping to effectively communicate the policy to all members of staff. It should also focus on ensuring managers know how to handle a report correctly.

Assign a representative from each department to promote the service as part of a wider 'ethics committee'. These staff members should be involved with planning and implementation stages, as they can provide valuable insights into potential risk areas, any barriers to acceptance of the service and feedback on the impact on different departments.

Place posters and promotional literature in offices, work locations and communal areas. Display details of the hotline in your staff room, fleet vehicles and on company-issued devices. Ensure the branding stands out from internal communications and other collateral.

Promote the service through the company's digital communication channels. Above all, make sure information is easy to find (employees will not want to ask how to find it when they need it most). Try to avoid 'burying' it under HR or code of conduct materials.

Use anonymous surveys. This will help you test employee awareness or uncover any potential barriers to usage.

ENSURING YOUR SERVICE REMAINS COMPLIANT AND EFFECTIVE

Staff churn, business developments, legislative changes and many other factors can affect the provision and requirements of your whistleblowing hotline.

Regular audits and reviews of the service are therefore crucial to its success. Meeting regularly with stakeholders and employee representatives, and gathering feedback through channels like employee surveys, will highlight any issues and provide insights for service enhancements, as well as potential training needs. Monthly reports, detailing metrics such as reporting volumes, report categories, and location can provide valuable insights into the effectiveness and usability of the service - as well as the strength of your corporate governance and risk-prevention programmes.

YOUR WHISTLEBLOWING HOTLINE CHECKLIST

When planning and implementing your whistleblowing hotline, there are eight areas that should be considered to help ensure you're following best practice.

Is our hotline...

Business appropriate?

Informed by our risk audit, our whistleblowing service addresses the key risk areas our business and employees are exposed to.

Independent and secure?

Our employees may feel more comfortable reporting concerns via a secure independent hotline service where access to the reports is strictly governed.

Accessible?

Our employees have easy access to the service by telephone, web, mobile or in person, on a 24/7/365 basis. We have provided native language services where required.

Confidential?

Where national law allows, colleagues can report their concerns anonymously, and always in confidence, and are kept informed on case progress, if they wish.

Compliant?

We have ensured our hotline is compliant with all legislation, including data protection and privacy, in all territories we cover. Policies are current and accessible. Well communicated?

Our employees are made aware of the service at induction and processes are in place to optimise communication on an ongoing basis through training and awareness campaigns.

Promoted by management?

Our 'tone from the top' is positive, inclusive and works in our employees' best interests. There is a zero-tolerance approach to whistleblower retaliation.

Insightful?

Our reporting data alerts us to the efficacy of the hotline service and identifies areas of concern within the business. We benchmark the business against our peers, where possible.

Outsourcing your whistleblowing hotline to an experienced service provider is a cost effective and hassle free way to ensure you tick all the boxes and more.

ABOUT THIS GUIDE

We hope this guide is useful to you.

The information provided here draws upon our experience as the world's leading provider of outsourced whistleblowing hotline solutions. If you would like to discuss introducing an outsourced whistleblowing hotline service into your organisation, please get in touch for a friendly chat.

Contact us to learn more >>>

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