



## 12 Internal Benchmarks for Helpline Reporting

### Brief Explanation of Internal Benchmarks

While senior leaders and board members often express concerns about how a company's data compares to external benchmarks, it is equally important that companies review their data internally, not just at the high level but diving into each business operation, location, or geography. Such a review can provide specific insight into the effectiveness of communications and training, can highlight trends in the cultural health of certain parts of the company, can help to assess the efficiency of investigations, and can deliver a number of other key operational and cultural metrics. Internal benchmarking provides important context, particularly when observing deviations from the internal norms over time. Here, the sophistication of an organization's case management system, and how it is configured, will determine how robust the analysis can be—offering more tracked data, more context, and more opportunity for actionable conclusions. By looking at the data over time, an organization can compare trends, detect trouble spots, and measure the effectiveness of its program. We recommend the following metrics be included in an internal "deep dive" benchmark review of reporting data.

#### CALL CATEGORIES OR TYPES OF REPORTS

A review of the types of calls which come in over a certain period can indicate elevated risks of certain kinds of potential wrongdoing as well as gaps in understanding of the policies and laws which affect certain groups of employees. In addition to categories benchmarked externally, organizations may have internal reporting categories to monitor specific risks.



#### GEOGRAPHIES OR LOCATIONS REPORTING OR NOT REPORTING

An excessive number of reports submitted by a sector of the company may indicate a serious cultural concern beyond what is indicated by the allegations. The converse, an absence of reporting from a group or location, can indicate an equally serious concern.



#### ALLEGATIONS VS. INQUIRIES

A high ratio of inquiries to allegations can indicate that employees are aware of their responsibilities to uphold a company's policies and ethical standards and that they are considering their job-related choices carefully. This information can also help inform training needs.



#### LEVELS OF EMPLOYEES REPORTING (AND NOT REPORTING)

It is important that companies evaluate whether they are reaching all levels of employees with ethics and compliance initiatives and that these employees are fulfilling their obligation to report observed misconduct. Absence of entire levels of employee groups engaging in the process could indicate lack of awareness or more serious concerns or lack of trust in the systems.



#### SOURCES AND TYPES BY GROUPS, LOCATIONS, BUSINESS UNITS, DEPARTMENTS

A demographic review of reporting data can provide innumerable insights into a company's culture which can serve as a review of the efficacy of its communications and training strategy as well as the cultural health of various employee groupings and business levels.



#### CHARACTERISTICS OF ANONYMOUS CALLS

It is important that companies review their anonymous contacts to ensure that their substantiation rate is reasonable, that employees are following up on their anonymous reports so that investigators are able to ask questions, and that there are no patterns in anonymous reporting related to different demographic or allegation groupings that might indicate elevated fears of retaliation.



### DISCIPLINE OR REMEDIATION ACTIONS

It is important that companies take a wide view of disciplinary patterns to ensure that employees at all levels and in all areas are held similarly accountable and that any disciplinary action is commensurate with the severity of the determined infraction and consistent with actions taken in other similar cases regardless of the level of employee involved.



### HIGH VOLUME OR SPIKES IN HR RELATED CALLS

While many see HR related reports as a nuisance, our experience has found that a spike in HR-related reports is often indicative of other potentially serious issues in an area which may be going unreported, such as potential fraud or accounting violations, or poor local management practices or behaviors.



### SOURCE OF AWARENESS

By reviewing how reporters became aware of the reporting channel they used, companies can assess awareness strategies and the efficacy of their communications.



### RETALIATION CASES AND OUTCOMES

Retaliation, and the perception or fear thereof, can be the single biggest deterrent to reporting at a company. Reviewing this metric serves to not only measure the actual levels of retaliation a company is experiencing, it also helps to determine whether or not the company's non-retaliation policy is being properly enforced. Issues and outcomes related to this metric should be part of executive reporting.



### SUBSTANTIATION RATE BY INVESTIGATING DEPARTMENT OR INVESTIGATOR

It is important that companies look for patterns among the allegations reviewed by each of its investigators and investigative groups to be certain that no prejudices or gaps in training exist and that the same quality standard is being met across all of the investigative resources.



### CASE CLOSURE TIME BY INVESTIGATING DEPARTMENT OR INVESTIGATOR

A review of case closure times by investigator or investigations team can help to determine whether each is executing their assignments in a timely manner commensurate with the complexity of the investigation.

In addition to the 12 Internal Benchmarks described above, each of the metrics defined in our Desktop Reference entitled 9 External Benchmarks should be tracked internally by employee level, business operation, location, or geography and monitored over time for trends and deviations. Two of the External Benchmarks also deserve inclusion here.

### Anonymous vs. Named Reporters:

Anonymous reporting is a good indicator of the level of employee trust in the system. Companies should review anonymous reporting across their various demographics to help to determine whether or not a particular group of employees has confidentiality or retaliation concerns.

### Substantiation Rate for Named and Anonymous Reports

A significant difference between the substantiation rate of reports made by employees who chose to give their names and by those who chose to withhold it can indicate an issue with the investigations process or in the motives of the anonymous reporters.