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Checklist: Evaluating the Effectiveness of Your Hotline

By Nina Youngstrom

This checklist was developed by Mark Pastin, president of Health Ethics Trust. Contact Pastin at mpastin@corporateethics.com.

Hotline Effectiveness Checklist

If you are responsible for an ethics hotline, here is a test you can take to make sure your operations are up to speed.

1. Does everyone involved in operating the hotline understand its true function?

- To provide a channel that employees will use instead of reporting to an external agency or through litigation.
- To isolate those committing, condoning or covering up improper acts by creating an environment in which others will report the improper acts.
- To let the organization make disclosures before outside agencies discover the improper acts.
- To prove the organization is capable of governing itself and doesn't need external supervision.

2. Would you be completely confident in the anonymity of calls and confidentiality of investigations if you were the caller?

- Do supervisors and managers have access to phone bills which log toll-free calls?
- Do your bills for the toll-free number identify the originating location? Who can get this information?
- Do those who follow up hotline calls understand the need to preserve anonymity and confidentiality? Would they be preserved despite pressure from their own boss?

3. Does your organization have a firm, separate and well-publicized policy barring retaliation against employees who report potential improprieties?

Hint: If no manager or supervisor has ever been disciplined for retaliating against a reporting employee, you probably do not have an effective policy prohibiting retaliation.

4. Would you trust your job and, perhaps, your personal freedom to the person(s) answering hotline calls? If not, why is (are) the individual(s) charged with answering calls being trusted?

5. When a caller raises a serious issue, do you normally get enough information to allow for a thorough investigation and resolution of the issue?

- Has the person taking the call ever done an investigation? (He or she should have.)

- Does the person taking the call understand the issues and organization well enough to know what information is needed to address the issue?

6. Do you know whether information recorded in taking and following up calls is legally privileged?

- Do you have an established protocol determining what information to write down and what information not to write down?
- Do you assume that having a member of the legal department answering the hotline automatically extends privileges to hotline calls?

7. Is the hotline staff supported by designated members of the legal, audit and human resources departments who understand the hotline functions?

8. When ethics or compliance training for employees is conducted, do the program leaders understand the functions of the hotline?

- Do program leaders feel obligated to downplay the hotline in deference to local management or human resources?

9. Are employees encouraged to call the hotline whenever they are uncomfortable reporting issues where they work? Is the hotline available to former workers?

- Is there pressure from executive management or legal and human resources to limit the hotline to "genuine" ethics or compliance issues?
- Are employees expected to know whether an issue is a compliance or "genuine" ethics issue?
- How should the hotline handle issues that are both ethics/compliance and human resources or operational issues — which most are?

10. Do individuals answering hotline calls have the authority to meet with callers at an off-site location near the caller's workplace? Do individuals answering hotline calls have the authority to negotiate with callers to gain necessary information?

11. Is there a career path for the hotline staff?

- What measures are taken to train hotline staff in new compliance developments and techniques for problem resolution?
- Is the hotline staff briefed on pending organizational developments such as cutbacks and mergers?

12. Is there a mechanism in place for executive and field managers to learn from the organization's experience with the hotline?

- Are calls tracked according to a typology that is instructive to executives and field managers?
- Is there a method for summarizing hotline experience for the use of executives and field managers?

13. Is there a compliance manual to support those answering the hotline in dealing with both common and critical issues? Is the manual updated in light of hotline experience?

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