



IntegrityCounts Awareness Playbook

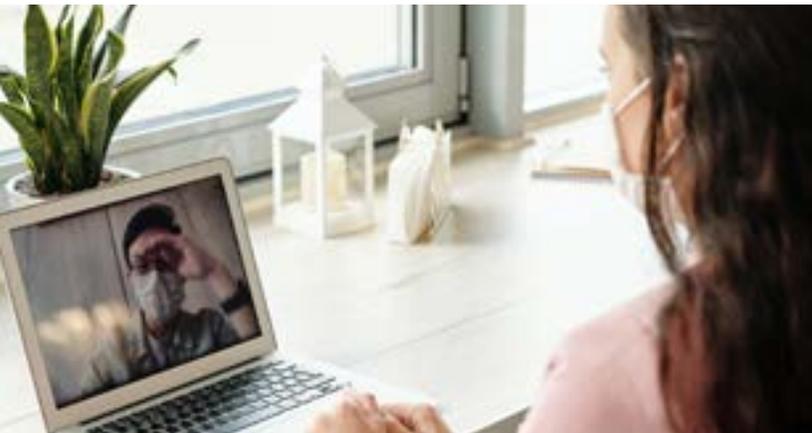
*How to build awareness of your ethics and compliance program
and encourage employees to speak up.*

Introduction to Your *IntegrityCounts* Program - The First Steps

Congratulations on implementing your *IntegrityCounts* ethics hotline and case management program. We are so happy to have you join the WhistleBlower Security family of clients who are truly serious about creating and maintaining a speak up culture in your workplace.

Now that you have implemented your program, it is important to let your employees and stakeholders know about the program. They need to know it has been launched and is available through multiple methods, and most importantly, how to use it.

If they are not aware of your program's existence, or if they are uncertain how they should be using it, you will not benefit from your *IntegrityCounts*' full potential to uncover ethical and safety related issues within your organization, and you are not going to get any meaningful engagement.



Today's workplace is no longer confined by physical walls. Instead it is defined by connectivity and adaptability.

There is a definite shift from what used to be regular workplace interaction, to creating and implementing new ways to communicate and collaborate. With this shift into a new type of workplace environment comes a greater importance in ensuring that all employees feel connected to their leadership, and co-workers.

The purpose of this document is to provide you with the information and tools to ensure that your ethics hotline and case management program is successful and to strengthen your organization's workplace culture.

We trust that this document and the support from your Customer Success Team will provide you with the knowledge, tools, tips, and ideas on how to get the most from your *IntegrityCounts* ethics hotline and case management system.

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Brand Your Program

Give it a Personality

Creating a brand identity for your *IntegrityCounts* program is a great step in helping to establish its importance, although it is not vital to establishing its credibility. However, your program's brand identity helps to add personality, substance, and appeal to your ethics and compliance program.

Get employees involved in a naming contest by inviting them to give recommendations on ideas for the name of your program, keeping in line with your company values, vision, and mission. Then when the winner of the naming content is chosen, they win a prize. Make it an event that is aligned with the launch of the program. Not only does this make introducing the program engaging for your employees, it reinforces just how serious you are as a company in implementing it in the first place.

Ways to Get Started



Name Your Program

Much like humans identify by their chosen names, your employees will identify to your program more if it too has a name.



Create a Logo

Once your program has a name, get creative by giving it a fun logo.



Create a Mascot

There are so many events and opportunities with which to showcase a brand mascot.



Customized Landing Page

Make it tangible with a customized landing page that showcases its name, logo, and personality.



Here is an example of how one of our clients has used their [customized landing page](#) to brand their program as the 'Speak Up Fraud and Waste Hotline' to their employees and the public.

Marketing Your Ethics Program

Marketing your ethics program is important because it ensures that the investment and time you took in the implementation of your program is properly amplified. Marketing the program helps create engagement and credibility and contributes to its success.

Marketing and awareness ensures your entire team is fully on board with your efforts to create an open speak up culture. Most importantly they have to believe in your commitment to creating a speak up culture that supports the program.

The following sections will provide you with some ideas and best practices that you can implement to ensure you get the most from your program.

Whistleblower Policy

It is important to remember that the work environment is not necessarily what leadership may think it is. It is what leadership does and how it behaves. A whistleblower policy helps reinforce this.

A whistleblower policy is a document that guarantees protection to the reporting party, your employees, and to your company. If you don't have a whistleblower policy, it's a good idea to create one. If your company already has a policy in place, it is advantageous to ensure that it is regularly reviewed and updated.

For employees, it should make them feel safe from retaliation if they do come forward to voice ethical violations.



Prevent Retaliation

Any adverse employment action such as termination of employment, poor work assignments, shunning by co-workers and/or threats of physical harm are not tolerated



Provide Confidentiality

Where possible the identity of the whistleblower is protected, but if the individual is required to testify or provide information in an investigation, their identity may be revealed.

For your company, a whistleblower policy adds credibility to your efforts to protect your employees and other stakeholders as valuable assets. It can be hard for a company to demonstrate a commitment to its policy unless something happens, but it can be reinforced by following some best practices.



Create a Whistleblower Procedure

Don't just write a bare minimum policy that says you support whistleblowers. Define an actual procedure, set out clear steps and expected outcomes and update the policy regularly.



Identify a Point Person

Provide employees with the name/position of the individual to whom they can report their concern if they choose a face-to-face approach. If the complaint is about the executive/leader, offer an alternative contact (usually the head of human resources or the chair of the board's human-resources/compensation committee).

If you have employees who do choose to come forward directly with a supervisor, you have your File by Proxy reporting option to input these reports into your IntegrityCounts system so that you can keep all reports centralized.



Communicate It Regularly and at Every Opportunity

Talk about your policy and reinforce the company's values in communicating to employees, and encouraging them to bring their concerns forward. As an example, post it to your company intranet or company-wide newsletter.



We have provided some [sample templates](#) you can use to start building out your whistleblower policy.



Retaliation

A very important factor in ensuring your program functions in a capacity that it is intended is to eliminate fear of the program.

Employees may fear speaking up about the small things or day to day issues because they feel like their fears may be dismissed as unimportant. If a climate is created where employees feel safe speaking up about small day to day issues, then employees will be more likely to speak up about more serious issues, and report through your *IntegrityCounts* program.

One of the biggest obstacles you may face is earning the trust of your employees and having them actually use the program. The biggest factor driving an employee's decision to not speak up is fear of someone finding out who they are, and fear of retaliation if they do speak up.

Here are a few tips to help eliminate retaliation:

1

Don't take out your frustrations about the whistleblowing employee on other employees.

This sends a message that if anyone does voice their concerns, they may find other people suddenly know about them. It eliminates trust in the anonymity and confidentiality of the process.

2

Investigate all claims.

Depending on the situation, an internal investigation or one conducted by outside counsel may be appropriate.

3

Treat employees consistently.

Before making employment decisions that may negatively affect the whistleblowing employee, ensure that you are acting consistently with past practice or that you can justify treating the employee differently.

4

Explain your rules and expectations to all employees.

Ensure that employees understand your organization's discrimination policies. Inform employees that retaliation is illegal and will not be tolerated.

5

Preserve evidence.

Use your *IntegrityCounts* program to save e-mails, personnel files and other documents that can allow all parties to tell their side of the story and back it up with concrete proof.

*Use the [messaging centre](#) to upload files to support each case when you communicate with both the reporting employee and your other *IntegrityCounts* users who are investigating each complaint.*

6

Assess whether additional retaliation might occur.

For instance, if the complaining employee is still employed, steps should be taken to minimize further retaliatory action.

Customized Landing Page

A customized landing page is a great way to promote your program and add to its credibility. Although not necessary to ensure that it functions well, a customized landing page helps to reinforce the company's commitment to providing a speak up culture.

A customized landing page allows your company to promote your program using your brand colours, logos, and copy that reflects your vision, mission, and values. The customized landing page is where you can showcase your chosen theme, name and/or logo your team worked to create. (see "**Brand Your Program**" on page 1)



Quick Study: *City of Hamilton*

See how one of our clients has used their [customized landing page](#) to brand their program to their employees and the public.



If you are interested in creating a customized landing page, please contact your Account Manager to further discuss adding this to your existing program. To assist in this conversation, here is a [design guide](#) to get you started and a [sample customized landing page](#).

Awareness of Your Program

An important step to making your program successful is to ensure that all employees and stakeholders know that it exists, and how you intend for it to be used.

There are many tools and marketing efforts you can use to ensure that everyone is aware of your program, and understand that you have implemented this program for the purpose of having people anonymously report on any wrongs they see and conflict with your code of ethics.

Here are some ways you can help draw more awareness to your program and get it in front of your employees.

Promotional Materials

Custom program materials like posters and employee issued wallet cards are included in our program in a digital format and allow you to promote the program across the organization.

Program materials are available using your company logo, brand colours and design. We will provide you with digital copies that you can print out whenever you need.

We are happy to work with you to design the right materials that speak to your team and your ethics reporting program.



QR Codes



A QR code is also included on your posters and wallet cards. A QR code works as a machine-scannable image that can instantly be read using a smartphone camera.

To use a QR code, simply open your camera, point it towards the QR code, take a picture, and the user will be prompted to open a link. Click on the link and it will direct the user to your company's unique URL to report their concern using the web-based portal.

Company Intranet / Newsletter

One of the best ways to keeping all your employees up to date with the latest developments in the company is through a company intranet or internal newsletter.

Oftentimes employees may not be informed enough of your program which may contribute to lack of usage. However, if your company has an intranet or newsletter that summarizes all important news and is shared regularly, you won't have anyone feeling left out of the internal community. Plus, you can even ask people to contribute to the newsletter and suggest ideas for content or even write a paragraph or two.

Here are few benefits of using a company intranet or newsletter to communicate your program:



Improve Internal Communication

Encourage communication across the entire organization. Teams can have open discussions. Employees can share knowledge. Leadership can stay in touch. Departments can provide updates. Anyone can share information and articles, and everyone can comment and provide feedback.



Connect Your Company Across Locations and Time Zones

An intranet or newsletter acts like a central online hub for your company where conversations take place, company news is shared, and events are planned. It's a great place to bring multi-location teams together. Each employee and location has insights into what's happening throughout the company, regardless of where they're based.



Helps Employees Find Information

An intranet or newsletter is a rich pool of information including social updates to group medical information. So why not use this tool to help employees navigate their whistleblower policy and understand how to speak up on ethical violations.



Boosts Recognition and Reward

Employees like to be recognized and rewarded. Recognition is an essential part of the employee experience, and it serves to improve employees' satisfaction and engagement levels. Recognition or reward doesn't need to be monetary or excessive. It can be a simple thank you that everyone can see.

Lunch and Learns

Lunch and learns are a great way to have your employees come together for a more informal gathering to have a lunch while learning about your *IntegrityCounts* program at the same time. It's a perfect place to allow employees to ask questions, voice any concerns, and maybe even do a little role playing. It's a great way to have a little fun together while ensuring you keep your program top of mind.

How Your Team Can Benefit



Efficiency

If you are a small to medium sized business, many of your teams like support, or services may not have time for traditional training. If you have a team that consists of a handful of employees, they may be needed elsewhere rather than focusing on personal development. Lunch and Learns can be run during break time, providing more time in their day-to-day activities. If the environment is relaxing and fun, your employees won't feel like their break has been taken away from them.



Team-Building

Many departments or job roles may feel isolated even though they operate in teams. If they do collaborate with other co-workers, most will use an internal messaging system to communicate. Lunch-and-learns create an opportunity for employees to meet with one another face-to-face. This builds a stronger community within your service teams because employees are more familiar with their teammates. That connection will improve productivity and expose hidden silos within your organization.



Networking

Lunch and learns offer a great opportunity to network with each other in an otherwise busy environment. For new employees, this can be a fabulous opportunity to connect with leadership - an opportunity that would normally not happen during a lunch or eating at your desk.

Sanitized Case Review

Using sanitized cases to review your company's internal workplace culture is a great way to build trust of your system. Sanitized cases are stories that have removed all personal information and tell of a situation that really happened at the organization. Use a Lunch and Learn to tell these stories.

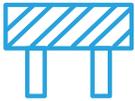
Here are some reasons to use sanitized cases for learning:

How Your Team Can Benefit



Using real cases enables everyone to use true experiences for learning.

Mistakes and poor choices are great teachers. Real cases help employees learn about topics that are relevant to their departments and jobs and they can immediately apply what they learn.



Everyone wants to know how they can avoid trouble.

Research indicates that we fear both humiliation, and separation from others. The idea of violating laws, rules and accepted standards stirs these human fears, so employees are extremely interested in learning how to stay out of trouble that could happen in their workplace.



Organizational justice is important to employees.

A key area of an ethical culture is for employees to understand and see organizational justice in action. Employees want to know that the rules are really enforced in their organization and this also lends credibility to the system.



Employees want real cases and examples to learn from.

Employees understand the appeal of real cases as a good learning vehicle and their value in helping people avoid the same mistakes.

Employee Reviews

The purpose an employee review is to promote communication, provide useful feedback about job performance, facilitate better working relationships, and contribute to professional development. During the review is a great time to reiterate your *IntegrityCounts* program, and allow constructive feedback on how employees feel about it, learn of any concerns they have about speaking up, and allow them to ask questions relating to your whistleblower policy and/or ethics and compliance program.

1

Allow Employees to Give Feedback to Managers

A performance review is a two-way street. It's intended to help employees and management. This is a time for employees to voice any concerns they have, and for management to reiterate the importance of the *IntegrityCounts* program.

2

Keep Employee Review Meetings a Two-Way Conversation

Instead of using the time during an employee review to lecture employees on what they need to improve and then sending them on their way, make sure the meeting is an open conversation. This might be the time an employee finally feels safe to speak up about any concerns they have. Then you and the employee can work through any issues right there so you can help that employee feel more confident when they leave the meeting.

e-Training

e-Training options offer a modern way to share knowledge about your *IntegrityCounts* program. e-Training offers knowledge transfer through the internet, from anywhere, so your globally located employees can learn in their own time. Our e-Training options allow you to train all your employees or stakeholders on how to use the *IntegrityCounts* program, how to file a report, how to respond to a report, and how to investigate and close a report.

How Our e-Training Benefits You

Flexibility

Many of your employees may be working varying hours during their workday. Therefore, live training can be hard to coordinate and manage. Our e-Training videos can be viewed anytime, anywhere. The only requirement would be an internet connection. For many, making time during a coffee break at work is the best time to learn about the new program you've implemented.

Easy Accessibility

You and your employees are busy; e-Training is readily accessible. Training videos that can be viewed at any time, and replayed as many times as needed, can help all parties learn the program faster.



Here is link to our [e-Training videos](#) you can share with all your employees. Please feel free to download these and save to your company intranet or other company-wide communication.

Gamification

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

Kahoot!

Quick Study:

Kahoot!

A platform you can use to incorporate ethics and compliance-based training into your workplace via a free app. You can check it out here: <https://kahoot.com/>

While many teams are joining together via Zoom or Skype, Kahoot! will enable your entire team to come together using fun and interactive activities while reinforcing your ethics and compliance program and you can build it out entirely to reflect your own distinct program.

Kahoot! allows users to play together in games such as multiple-choice quizzes that can be accessed via a web browser or the Kahoot! app. Using games and trivia is a great way to engage employees and provide added entertainment while at the same time teaching them about what you need to teach them.

Building Compliance Awareness

Keeping your company compliant means ensuring employees have the right training on a variety of important compliance training topics, including things like safety, harassment, anti-retaliation policies, and your IntegrityCounts program. To have maximum impact, compliance training and knowledge starts with leadership.

1

Start With Leadership

The effectiveness of a compliant program requires commitment by company leadership to implement a culture of compliance from the middle and the top.

2

Align Compliance With Company-Wide Risk

Your compliance program should address risks that arise in each strategic area or department.

3

Train and Test

Invest in employee training, whether Lunch and Learns or something more formal, that explains corporate policies, as well as what behaviours are prohibited. Training should be ongoing with regular policy review and employee assessment.

4

Incentivize Ethical Behaviour

Incorporate it into performance reviews. If compliance is tied to compensation, employees are much more likely to learn, adhere to and incorporate policies into everyday duties.

5

Don't Ignore Compliance Mistakes

Mistakes are often likely to occur over again, so analyze the incident to help others avoid the same mistake. Be aware that a violation may be an indication that a policy needs to be modified. Be willing to discipline employees who violate company policy, which provides further motivation to comply.

Build it Into Your Corporate Value Statement

A value statement isn't some kind of jargon speak for "what we think matters". It's a statement of what your company is, what it stands for, and what everyone can expect from it. You might sometimes hear it as being the "soul" of your team.

It's a message which conveys the values and priorities of your company. This lets your customers and staff know what's important to your business and the kind of culture it has.

It's important to build compliance awareness into your value statement. To gather input, an idea is to run a session during a company-wide meeting and ask everyone to vote on certain topics that they think matter. This means asking questions like "what word do you want colleagues to think of when they think of our compliance program?" The most common answers that make sense can be used as a starting point to craft your statement. Make it a contest and provide a prize to a winner. Keep it fun and inclusive.

Involve all employees in the process right from the start.

It's a statement of what your company is, what it stands for, and what everyone can expect from it.

Introductory Letter from the CEO

Having your CEO or other leadership introduce your *IntegrityCounts* program by sending out a personal letter about your program will help to reinforce its importance. Effective leadership helps to build a great organizational culture and leaders can reinforce values while simultaneously holding people accountable.

Influence over others can be either positive or negative based on the leadership style and execution of strategy. Your company's leaders should be deliberate in creating a culture where employees can speak up and thrive.

When leaders connect their people, employees are more likely to have a strong sense of purpose and more likely to be highly engaged while at work.

A great way to introducing your *IntegrityCounts* program and gain employee buy-in, trust, and engagement is through communicating the program through an introductory letter.



We've [created a draft document](#) that you can use to communicate to your employees. Please download and edit this document as you need.

Codes and Policies That Speak Clearly to Your Team

Policies on ethical behaviour help an organization manage expectations by giving employees concrete ideas about what is right and what is not accepted in the workplace, without the need for constant management presence to supervise them. Ethical policies are guidelines for all employees of a company to do the right thing and behave at high standards at all times.

Good ethical policies create a good culture based on trust and transparency. They promote moral conduct, and they benefit customers as well, as happy employees develop happy customers who keep coming back.

When you create your policies, whether whistleblower policy, or code of ethics or conduct, it's very easy to fill them with legal jargon that not all people actually understand. Yes, these tend to be policies that might have to go through a legal department, but at the end of the day, your employees should understand their meaning. So, don't fill them with unnecessary legal words, acronyms, or phrases that will result in nobody understanding what they mean, or why they exist.

Your policies and Codes should properly steer all business decisions in the right direction and demonstrate to employees you are a responsible company. They should not leave the reader confused.

They should help employees make the right decision when there isn't a 'rule' for a questionable situation they may come up against.



Please find some examples of policies [here](#) that you can use as a starting point to creating, or editing your policies.

Employee Engagement Surveys

Employee engagement surveys are often cited as being critical to gauging the “temperature” or “mood” of the workplace. There are a number of benefits to using surveys to help you learn about how your employees feel about your workplace culture and how they feel about your *IntegrityCounts* program.

Benefits

1

They give you a way to measure how committed, satisfied, and content employees are.

2

Can gauge whether there will soon be a turnover problem.

Surveys can ask directly how long the employee intends to stay with the organization. Because these surveys are typically anonymous, the answers are likely to be insightful.

3

Are a way to get anonymous feedback on how to improve the organization.

4

Can provide insight into where employee morale stands beyond what you see on the surface.

5

Can let employees feel heard, which can improve satisfaction.

This is especially true if the organization follows up on the feedback provided and makes changes accordingly.

6

Are a way to track trends from year to year in terms of employee sentiment.

7

Can allow the HR team to make informed decisions about what changes could be made in the company culture to improve morale.

When the company follows up on these changes, it can improve productivity and reduce turnover as a result.

Create Compliance Champions

One best practice of a compliance program is to engage someone who isn't in a legal or existing compliance role as a "Compliance Champion". This allows a company to leverage resources and to expand the compliance program footprint within the company. And it will foster a work environment that is more committed to compliance.

A Compliance Champion(s) should be trained to be your first line of compliance knowledge for people on the front lines, both to respond to routine queries and to alert the Legal Department if a problem needs to be escalated. It's also someone who is knowledgeable in your *IntegrityCounts* program and can be a go-to person should anyone have any questions.

Benefits



Having a compliance champion may be an efficient and cost effective way to further improve your compliance program and buy-in of your *IntegrityCounts* program.



Compliance champions are compliance ambassadors and should be educated and empowered to provide compliance training, help identify the major risk areas, and much more.



The compliance champion should be someone who really wants to be in that position, truly believes in compliance, is perceived as model of ethics and integrity, is able to influence others, thinks strategically, and exercises leadership.



A compliance champion provides different views of the organization and provides the organization the opportunity of having not only compliance officers speaking about compliance, but other employees as well.

Product Advisory Council

Client feedback is integral to how the *IntegrityCounts* platform continues to evolve. That's why we encourage our clients to join our Product Advisory Council, a client driven initiative on product innovation that allows our clients to provide the best insight into how the *IntegrityCounts* solution evolves.

This is a great way for our clients to share ideas, best practices and learn from your colleagues. We value what our clients have to say about how the product works and our Product Advisory Council offers you a voice in the development of *IntegrityCounts* and this in turn, makes it a product truly unrivalled in the market.



If you are interested in joining our Product Advisory Council, we invite you to contact your Account Manager to discuss this opportunity further.

Ongoing Customer Support

WhistleBlower Security has a dedicated Customer Success Team that leads our clients through the set-up and implementation phase of their *IntegrityCounts* program, as well as providing ongoing support whenever you need it at any time during your contract.

Our Customer Success Team offers training, support, and can work with you to ensure awareness campaigns and engagement strategies are implemented to ensure the success of your program.

Our Customer Support Team can be reached any time at the support@integritycounts.ca email.

Summary

We are excited that you have committed to creating a speak up culture in your workplace by choosing WhistleBlower Security and IntegrityCounts as your ethics hotline provider. Our commitment to your success continues throughout the life of your program.

Remember, the most important thing you can do from the start is to ensure that leadership focuses on promoting the program and ensuring that employees feel safe and confident when using it. Creating a speak up culture is vital in uncovering ethical and safety related issues within your organization.

*Thank you for choosing WhistleBlower Security
to help make this happen.*

