Tips on Hotline Effectiveness

By Richard Kusserow | February 19, 2019

Employee communication of compliance issues through a hotline is vital to any effective compliance program. The challenge is finding useable data that can be leveraged to evaluate hotline effectiveness and continued program improvements.

The most common metric Compliance Officers use in reporting on the effectiveness of their hotline operation is call volume. However, call volume data can be difficult to understand or fail to tell the whole story depending on how it is presented. For example, many believe that low call volume is good because it means there are few problems warranting a call and therefore fewer problems that require resolving. However, low call volume could mean there are a lot of reportable issues, but employees lack confidence in the communication channels for reporting and are not utilizing them. On the other hand, if the call volume is high, it may mean that there are a lot of problems that need to be reported; or it could mean that employees have a lot of confidence in the hotline operation and are willing to provide information. Given these scenarios, call volume alone is not a useful metric when evaluating hotline effectiveness. It is also important to explore the details of the information that are being received through the hotline and how they are being handled. When assessing the effectiveness of a hotline, an organization should also look at:

- Changes in call volume to try and understand the reasons volume may be high or low;
- Spikes in calls related to one operational or geographic area;
- The time it takes to resolve an action following a substantive call;
- Whether the parties responsible for resolving complaints completely followed through to the inquiry's conclusion or if they provided an incomplete effort;
- Patterns of complaints over time from specific locations or program areas; and
- Data to analyze and identify trends or significant issues likely to create compliance risks.

Moreover, organizations should also consider independent evidence of an employee's understanding and trust in using the hotline. There are several ways an organization can gather independent evidence regarding employee trust and understanding of the hotline, such as:

- Using an independent compliance program assessment focusing on employee hotline knowledge and confidence.
- Finding a facilitator to conduct employee focus group meetings that include discussion of the hotline. Employees are more willing to be open to a neutral outsider.
- Employing independently developed and evaluated compliance culture and knowledge surveys to find answers relating to employee attitudes, perceptions, and knowledge of the hotline.

- Asking questions about the hotline during an exit interview process. Departing employees may be more candid since they are leaving.
- Asking individuals who identified themselves when filing complaints via the hotline why they used the hotline to register a complaint as opposed to other reporting avenues.

Regardless of what tool an organization uses, it must address the confidence level that employees have in raising their concerns through the hotline. If the organization finds that the hotline channel is being regularly used, this may suggest that other reporting channels through management and human resources are not viewed as the best way to have concerns heard and addressed. This by itself is a finding worth examining.

For more information about hotline best practices, policies, employee surveys, and investigations, contact Daniel Peake at (dpeake@complianceresource.com) (703-236-9854).