

What is an Ethics and Compliance Reporting Programme?

Background

Most of us get through the working week without seeing or experiencing behaviour which clashes with our own sense of what's right and the values which are shared in our business.

There may be times though when what we see, hear or experience just feels wrong and is clearly not in line with our values. When this happens it is important to speak up. The challenge is speaking up can sometimes be difficult, because we're testing the behaviour of someone we know and need to get along with in our work, or someone who has authority over us.

Most organisations encourage and support open and honest communication. They encourage people to talk directly to people whose behaviour worries them, or to their managers or Human Resources. Organisations do not want people to turn a blind eye to something which bothers them, because their reputation as a business rests on how honestly they treat one another, their customers, their shareholders and their communities.

But they also recognise that people do worry about raising issues because they are worried about 'getting involved' and what might happen next.

That's why we have established The Whistle-Blower Hotline. It is for reporting issues like theft, fraud, harassment, misconduct or other unethical behaviour which worries you. Having it there means that anyone, anywhere in our business, can raise a concern without being worried about the outcome for them.

How it works

The Whistle-Blower Hotline is an independent service operated by Habit Health. You can contact the Hotline to report dishonesty or unethical behaviour, such as suspected theft, actions damaging the safety or quality of our products or services, harassment, workplace safety hazards or unsafe practices by using the free-phone number 0800 327 669.



When you telephone The Whistle-Blower Hotline you will be connected to an EAP National Support person who will take your call. This service is anonymous. You will not be asked to reveal your identity unless you choose to do so. The EAP National Support person will ask you a number of questions to help fully understand the concern you are reporting.

In principle, our aim is to protect the identity of people who report concerns.

Once Habit Health receive a report, an experienced Habit Health Manager will review and summarise the information provided, suggest specific follow-up actions and submit an anonymous report to the organisation ethics investigator for follow-up or corrective action.

What to report

The type of information you need to provide when reporting a suspected incidence of dishonesty or unethical behaviour should include:

- Names of people involved
- Names of any witnesses
- Date, time and location of incident(s)
- Details of any proof
- Money or assets involved
- How often the incident has happened

The Whistle-Blower Hotline is provided for situations where it is not possible to speak with your manager or HR contact – for example if you want to ensure your report is anonymous, or if your manager is involved in the situation.

The Whistle-Blower Hotline is not intended for resolving employment relationship problems such as disputes or personal grievances. There are special processes and facilities for resolving employment relationship problems. This is set out in your individual employment agreement and advice is available from your manager or HR contact.

Your questions answered

Q: Why should I report dishonesty or unethical behaviour?

A: To help make us a fair, safe and honest place to work with a business reputation for honesty and integrity. Dishonesty or unethical behaviour can have a negative effect on our workplace and reputation. By reporting dishonesty or unethical behaviour we can all share the benefits of working for an organisation with a sound reputation.

Q: Can I be anonymous?

A: Whether you want to stay anonymous is up to you. When you contact The Whistle-Blower Hotline you can inform The Whistle-Blower Hotline who you are or choose to be anonymous.

Sometimes your identity may be apparent to us from the information you provide. Advise The Whistle-Blower Hotline if you are concerned about this and if possible they will try to work out a way you can remain anonymous.

Whether you choose to be anonymous or not, The Whistle-Blower Hotline will try and ensure that you remain anonymous if you choose to do so. The Hotline will keep any information you give us about yourself confidential within the hotline service. The report will be disclosed to the dedicated representative within our organisation for them to action; however this will not include your identity.

The Whistle-Blower Hotline may disclose it on the very rare occasions it may be required by law to do so.

Q: What happens when I make a call?

A: You will not be asked by the Whistle-Blower Hotline to provide your name. Your report will be known only by a reference number unless you choose to tell the Whistle-Blower Hotline your name.

Q: What should I report?

A: Any suspected dishonesty or unethical behaviour within our organisation, such as suspected theft, actions damaging the safety or quality of our product, harassment, workplace safety hazards or unsafe practices.

The Whistle-Blower Hotline is not intended for resolving employment relationship problems such as disputes or personal grievances. There is a special process and facilities for resolving employment relationship problems. Advice is available from your manager or HR contact.



Q: What do I need to tell the Whistle-Blower Hotline?

A: Tell the Whistle-Blower Hotline as much as you can when you report an incident. For example:

- Names of people involved
- Names of any witnesses
- Date, time and location of incident(s)
- Details of any proof
- Money or assets involved
- How often the incident has happened

Q: What if I suspect something is wrong, but I am not sure?

A: Most cases reported are uncovered through tips from honest people who are not sure of their facts. That is fine. We do not expect you to know every detail. Reporting what you do know is enough.

Q: Will I be involved after I report an incident?

A: Once you make a call to report dishonesty or unethical behaviour, you will not need to be further involved. However, if you have new or additional information, or would like to make an adjustment to a report, you can make a follow-up call and quote a reference number that is provided to you at the time of the initial call.

Q: How soon will our organisation be notified after a call is reported?

A: The Whistle-Blower Hotline will provide a report to a dedicated representative within two business day of your call. Of course, if you report something life-threatening to The Whistle-Blower Hotline then we will tell your organisation immediately.

Q: Do I get rewarded for reporting suspected dishonesty or unethical behaviour?

A: No, there is no reward for reporting suspected dishonesty or unethical behaviour to The Whistle-Blower Hotline. We all want to make our company a great place to work and reporting unethical behaviour helps with that goal.

Q: How many times can I contact the Whistle-Blower Hotline?

A: You can contact the Whistle-Blower Hotline as many times as you want to report suspected dishonesty or unethical behaviour.

Q: Are law enforcement agencies notified of reports made to the Whistle-Blower Hotline?

A: The information provided to The Whistle-Blower Hotline is forwarded to an ethics investigator who is responsible for actioning the reports made to the hotline. If the ethics investigator decides that corrective action is necessary, then they may notify a law enforcement agency such as the police if appropriate.

Q: Will there be an investigation process after each report is made?

A: Whether there is an investigation depends on a number of factors including the information provided, the details, documentation and our company policy. We will decide what action is required when we receive the report from Habit Health.

Q: What personal information will the Whistle-Blower Hotline collect about myself and others?

A: The only personal information we collect is what you provide us. The service is anonymous and you do not need to give your name or other contact details.

Q: How will The Whistle-Blower Hotline use or disclose personal information?

A: The Whistle-Blower Hotline will disclose personal information it collects only to our ethics investigator, so they can act on your report, and as required by law or a regulatory authority. The Whistle-Blower Hotline does not use or disclose personal information for any other purpose.

Q: What happens if I provide incorrect information?

A: Everyone can make a mistake and incorrectly interpret a situation. There are no repercussions for disclosing information that is later found to be inaccurate or incorrect if the information was provided in good faith.

Q: What happens if someone knowingly provides incorrect information i.e. makes a false or malicious accusation?

A: We will not tolerate any person making an allegation known to them to be false, or otherwise acting in bad faith or maliciously, when reporting to The Whistle-Blower Hotline. We will take all necessary steps to fully investigate if it suspected this has occurred. Anyone providing information in bad faith will be subject to disciplinary action.

Q: Will I be advised of what has been done about the issue I report?

A: Yes if you have provided your contact information, otherwise this is not possible.



Prioritise your wellbeing with habithealth+
Talk to us about how the app can help your organisation.



Scan the QR code
to download