

# **CASE MANAGEMENT: FROM COMPLAINT TO DISPOSITION**

Daniel Kline - NAVEX Global

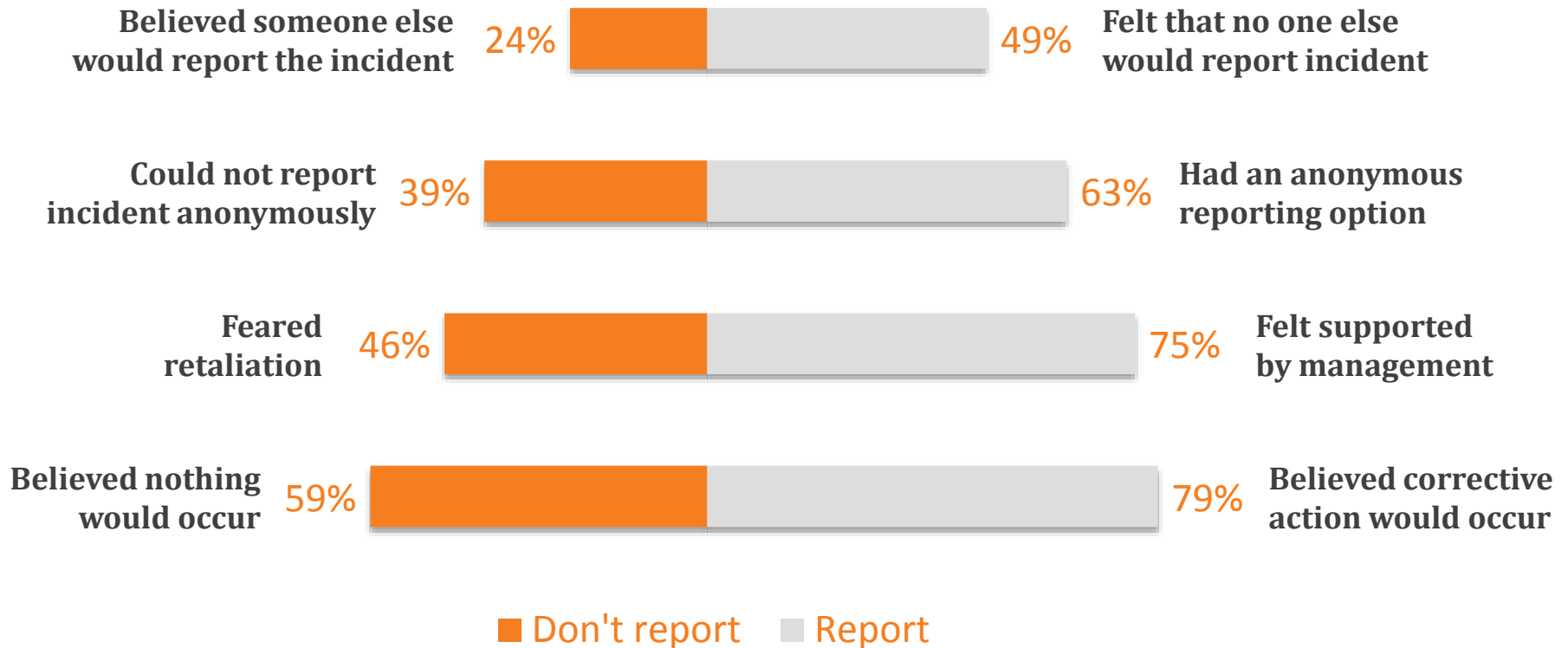
Luciana Rodrigues - Syngenta



# Case Management: From Complaint to Disposition

Daniel Kline, Managing Director EMEA & APAC, NAVEX Global  
Compliance Week Europe - Brussels, October 2015

# Reporters vs. Non-Reporters



Source: *Inside the Mind of a Whistleblower, 2012* – Ethics Resource Center



NAVEX Global Benchmarking

# 2015 HOTLINE BENCHMARK REPORT



## We Currently Calculate:

- Report volume
- Report categories
- Repeat reporters
- Anonymous vs. named reporters
- Follow-up rate
- Substantiation rate
- Anonymous substantiation %
- Case closure time
- Reporting intake method
- Retaliation reports

# Report Volume per 100 employees

2010 Benchmark		2011 Benchmark		2012 Benchmark		2013 Benchmark		2014 Benchmark	
Call Volume Per 100 Annually		Call Volume Per 100 Annually		Call Volume Per 100 Annually		Call Volume per 100 Annually		Call Volume per 100 Annually	
Median	0.9	Median	1.1	Median	1.2	Median	1.2	Median	1.3
Range	0.2 - 3.9	Range	0.3 - 6.0	Range	0.4 - 4.9	Range	0.5 - 4.0	Range	0.3 - 8.3

The 2014 median rate represents a 44 percent increase in the *report volume per 100 employees* over the previous five years.



Too many calls is not good news...

Too few isn't good either



Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Remarkable Consistency Across Allegation Categories

<b>Allegation Categories</b>	<b>2010 Median</b>	<b>2011 Median</b>	<b>2012 Median</b>	<b>2013 Median</b>	<b>2014 Median</b>
<b>Accounting, Auditing &amp; Financial Reporting</b>	3%	3%	3%	3%	2%
<b>Business Integrity</b>	17%	16%	17%	18%	17%
<b>HR, Diversity &amp; Workplace Respect</b>	69%	68%	69%	73%	69%
<b>Environment, Health &amp; Safety</b>	7%	9%	7%	7%	6%
<b>Misuse / Misappropriation of Corporate Assets</b>	5%	7%	6%	6%	6%

Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Report Intake Method

## HELPLINE

2013:

36%

2014:

32%

## WEB SUBMISSION

2013:

20%

2014:

23%

## ALL OTHER METHODS

2013:

44%

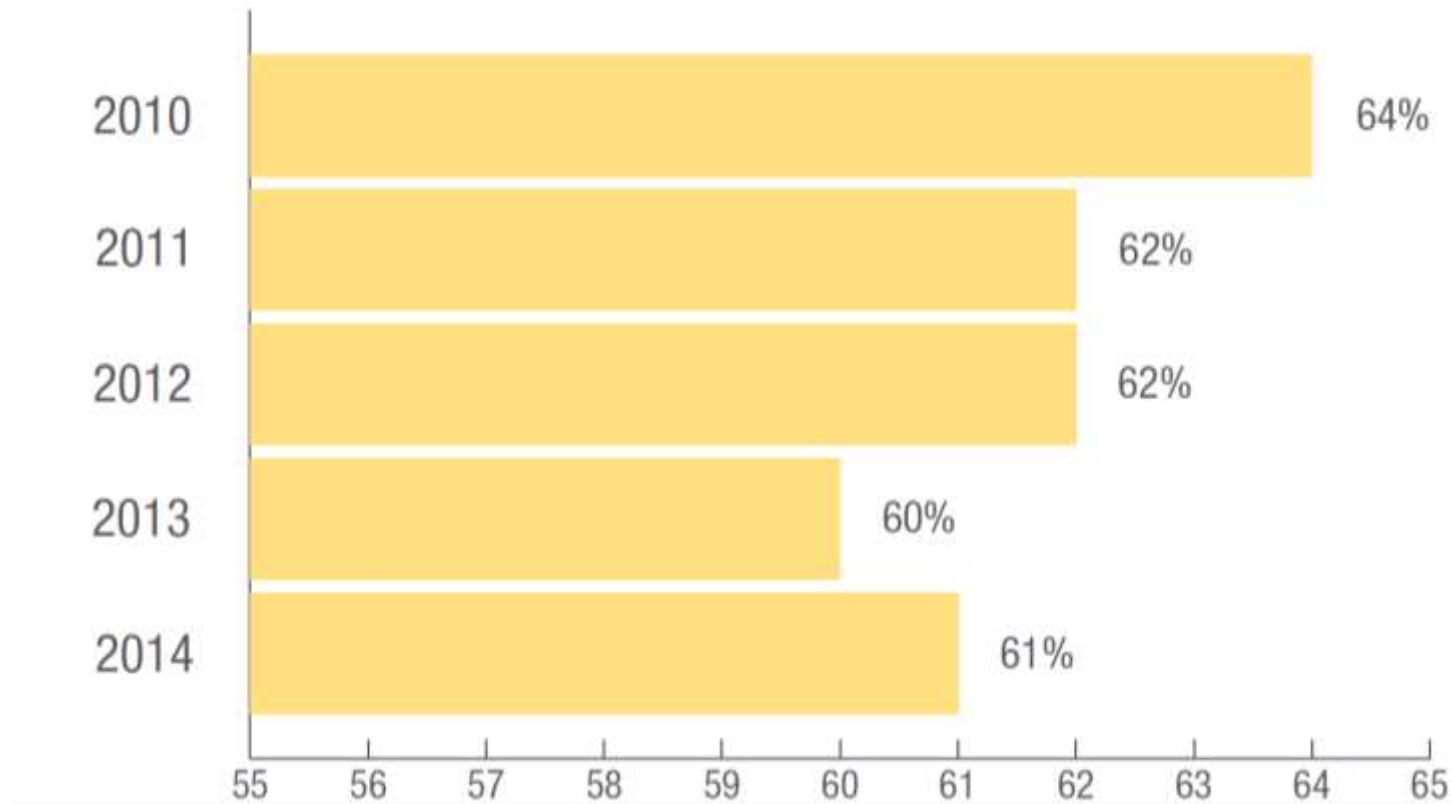
2014:

45%

\*Benchmark includes only companies who track all intake methods in the NAVEX Global case management system.

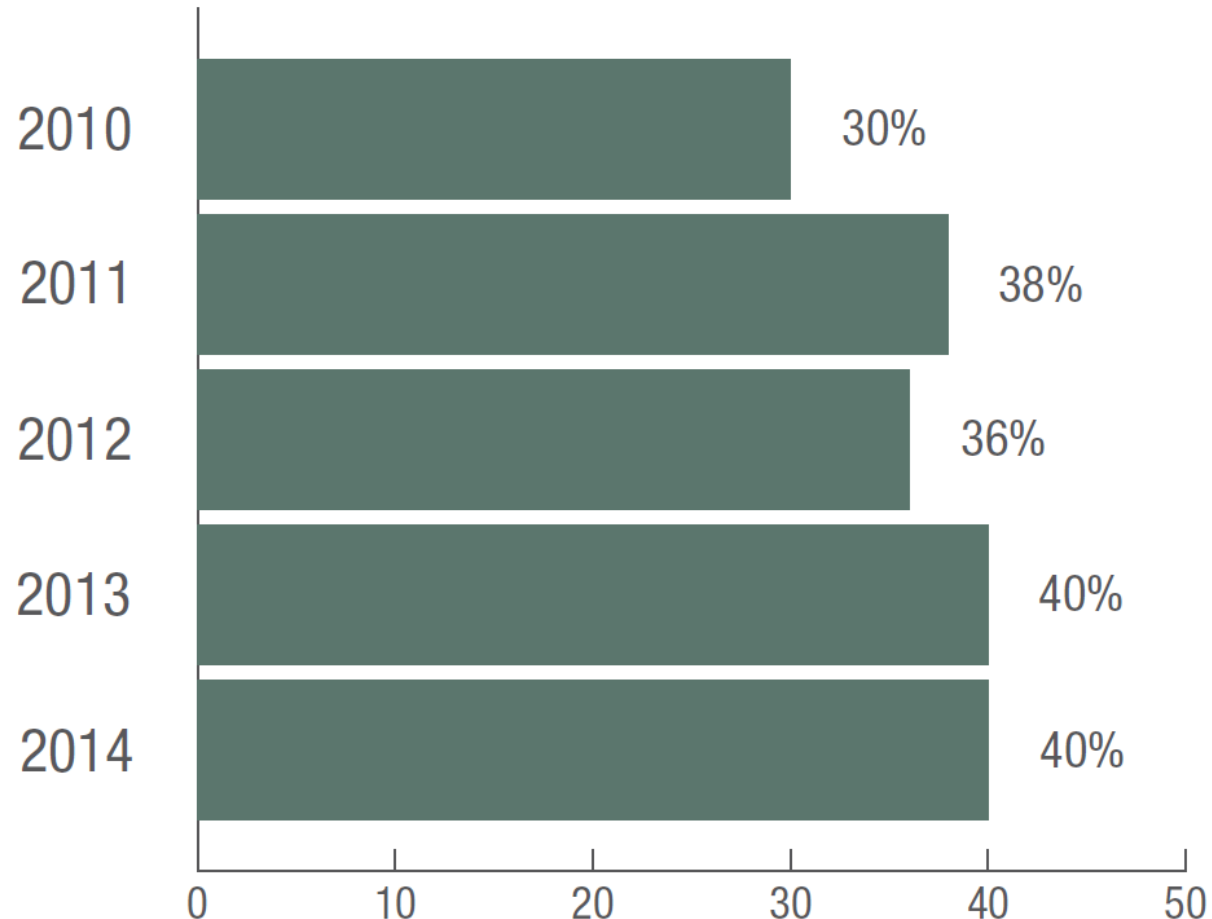
Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Median Anonymous Reporting Rate



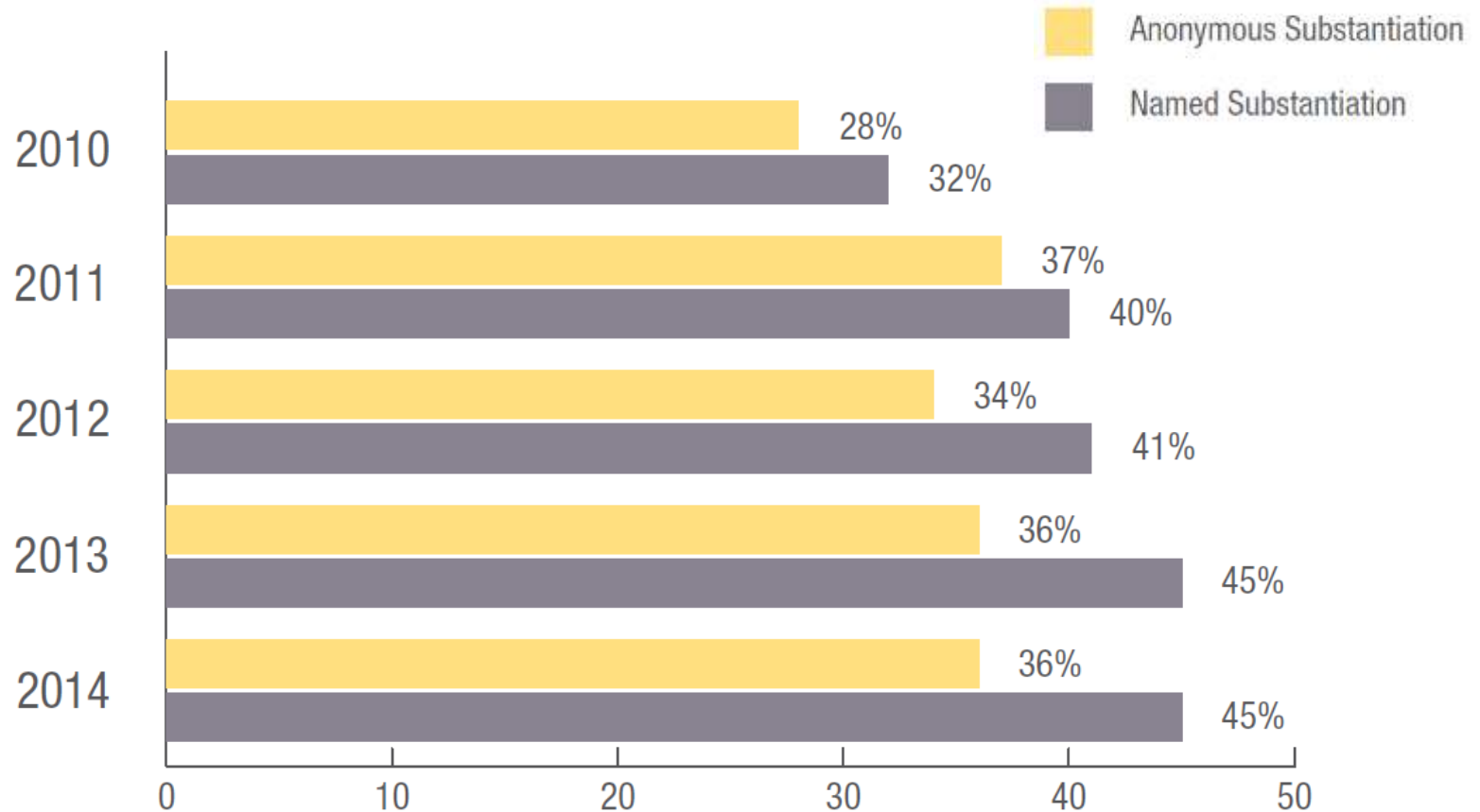
Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Overall Median Substantiation Rate



Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Substantiation Rates Between Anonymous & Named Reporters



Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Repeat vs. First-Time Reporters

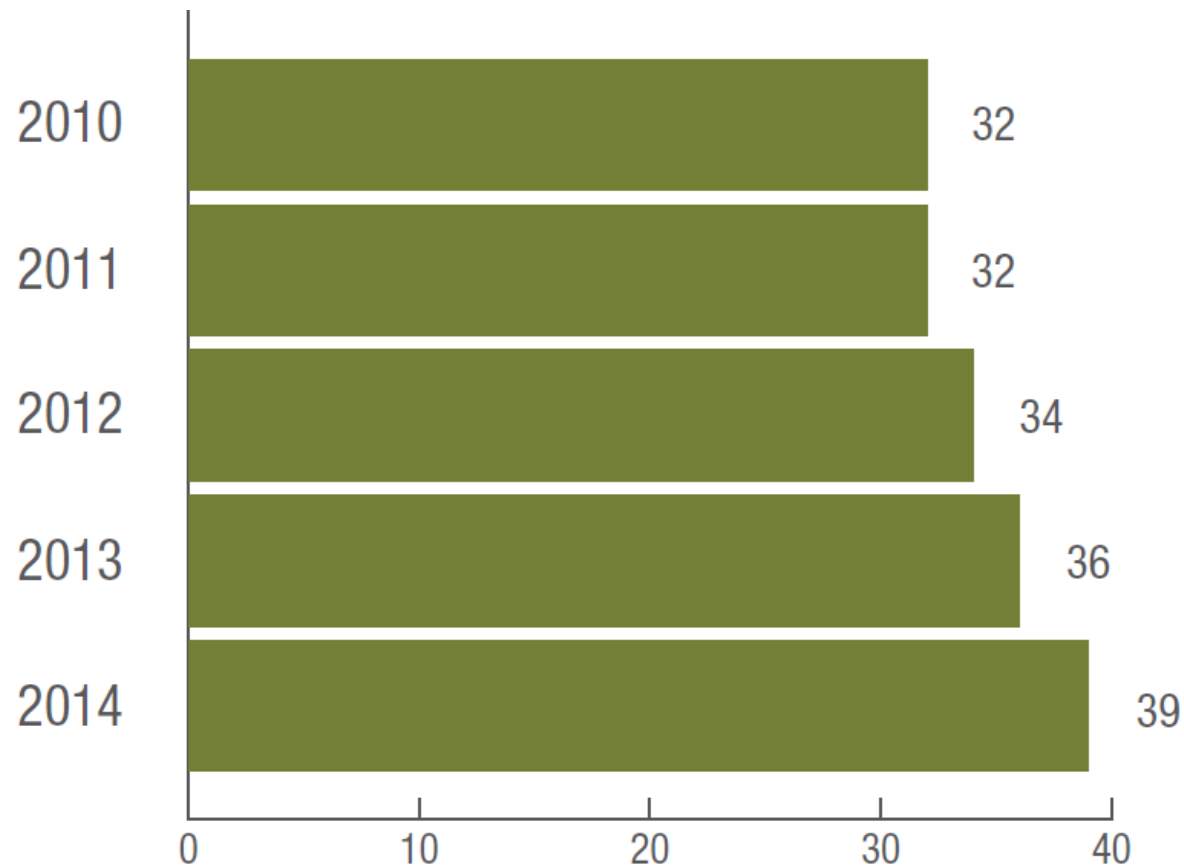
2010 Benchmark		2011 Benchmark		2012 Benchmark		2013 Benchmark		2014 Benchmark	
Repeat Reporters		Repeat Reporters		Repeat Reporters		Repeat Reporters		Repeat Reporters	
Repeat	24%	Repeat	27%	Repeat	27%	Repeat	31%	Repeat	32%

Substantiated Rate	2013	2014
First Time Reporters	35%	40%
Repeat Reporters	38%	42%

Caller Type	Accounting, Auditing & Financial Reporting	Business Integrity	HR, Diversity & Workplace Respect	Environment, Health & Safety	Misuse / Misappropriation of Corporate Assets
First Time Reporter 2014	1%	13%	76%	7%	3%
Repeat Reporter 2014	3%	10%	81%	4%	3%

Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Median Case Closure Time in Days



Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)

# Case Closure Time by Allegation Category (in Days)



Source: [NAVEX Global's 2015 Ethics and Compliance Hotline Benchmark Report](#)



# Case Management: From Complaint to Disposition

**Luciana Rodrigues**

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Compliance Week Europe - Brussels | October 2015

# Case Management: From Complaint to Disposition?

## Common pitfalls

- Fear of retaliation
- Don't trust the company will take action
- Fear that confidentiality is not really there
- Belief that manager will be made aware
- Fear of jeopardizing colleagues
- Fear of creating a 'witch hunt' environment

**Having a good case management process is not good enough.  
You need to create the right positioning and the right environment.**

# Mindset & Culture: The Compliance Journey

## As is

### Know

- Compliance is important for Syngenta
- It's a priority for legal and finance

### Feel

- It's something someone else is dealing with
- Unsure about what their responsibility might be

### Do

- Don't take accountability for it

## Compliance journey

### 4 phases

Demonstrate leadership

Develop a 'speak-up' culture

Encourage individual responsibility

Share best practice

## To be

### Know

- Compliance is a personal responsibility
- Syngenta is committed

### Feel

- Everyone is accountable
- Confident in playing their part

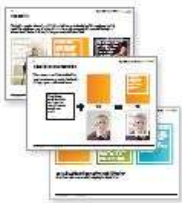
### Do

- Act with integrity
- Report any issues or concerns
- Act in a proactive way

Communication strategy plan



Look and feel



Launch helpline



Launch comms toolbox



Speak-up - Informal compliance sessions



Build on intranet to promote stories and case studies



Track progress



Recognize success



# Creating the Right Positioning and Environment

## Drive a speak-up culture

- Support culture of transparency and dialogue
- Encourage honest conversation around issues

## Increase understanding

- What are my responsibilities when it comes to compliance?
- How does the helpline work and what happens when I raise an issue?

## Improve user experience

- Increase overall visibility and provide easy access to the helpline
- Help users comfortably navigate the site and track the status of issues they raise

# Compliance Helpline Campaign: Part of Broader Communications Program

- We need to educate Syngenta employees about the key compliance issues so that they are able to maintain both their individual integrity and that of Syngenta.
- The helpline is a fundamental element of an effective compliance framework but we also want to encourage more open and honest dialogue within the business.
- Fostering a speak-up culture will be the focus and core objective of the helpline campaign.

To emphasise the integrity that lays at the heart of Syngenta and each of its employees.

For each employee to realize the importance of integrity for sustainable business growth and their individual responsibility in making it happen.

For each employee to share their own compliance stories in a positive way that enhances the integrity of the company.

# Refreshed Compliance Helpline: Key Facts



[www.syngentacompliancehelpline.com](http://www.syngentacompliancehelpline.com)

- Launching in April
- Refreshed text and design in line with the Syngenta brand voice
- Available in 24 languages, 24 hours a day, 7 days a week
- Operated through an external provider, NAVEX
- Questions / issues can be raised via telephone, free of charge, or be submitted online
- Where permitted by local law, people can remain anonymous
- All cases are treated as confidential and details will only be shared with those who need to know in order to conduct the appropriate investigation

# Compliance Helpline Campaign: Communication Materials

- Posters with six different compliance scenarios (14 languages)
- Table toblertone signs for meeting rooms and entry areas (9 languages)
- Concertina booklet (pocket size) with table top dispenser (9 languages)
- Ad banners for local websites and mySyngenta
- Direct link to the compliance helpline website on global mySyngenta



# Mindset & Culture: Communication to Managers & Leaders

How to shape the environment in Syngenta needed for a successful and sustainable cultural shift in Compliance?



Your behavior as leaders sets the bar for other people – you are watched!



You as leaders are part of the «tone from the top» - people are listening to what you are saying and how you are saying it!



You as leaders are key to create the right environment in Syngenta – encourage people to speak about compliance!

You as a leader have to **take accountability for compliance**, to be a **role model** for the right behaviour, to set a **strong tone from the top**, to **hold others accountable** and to **create the right environment** for people to talk about ethical behaviour and integrity.

# Compliance Helpline Campaign: Leader's Pack

- The leader's pack provides guidance for leaders on how to reinforce the compliance message with employees and how to use the helpline.
- Materials:
  - Letter from head of legal & taxes
  - Ethical leadership guide
  - Compliance helpline key messages
  - FAQ's about the compliance helpline



# Helpline Relaunch Preparation

- Recognize that a compliance communication campaign and compliance helpline relaunch is likely to result in an increased number of matters raised.
- All managers and functions that are involved in conducting investigations need to prepare for increased activity in this area.
- Helpline portal invites employees to 'Ask a Question' in addition to 'Raising a Concern'.
- Critical that employees that bring forward concerns are thanked for doing so and receive feedback that their report:
  - has been received
  - has been taken seriously
  - will be appropriately handled

# THANK YOU

**We want your feedback! Use the conference app or visit the Registration desk.**

**Be sure to join the Twitter conversation: @CWEurope**