



SAFE REPORTING SERVICE PROVIDER
STANDARD: **EXTERNAL**

>> SafeLine - EX <<

The best practice standard for safe reporting service providers.
Developed by The Ethics Institute.

INTRODUCTION

The Safe Reporting Service Provider Standard External (SafeLine-EX) is a best practice standard which specifies requirements for a quality safe reporting system managed by independent safe reporting service providers. Independent safe reporting service providers use the standard to demonstrate their ability to consistently provide quality services that protect whistle-blowers. The standard should be seen as a business management tool that independent safe reporting service providers can use to drive value, improve operations and reduce operational and reputational risks.

SCOPE OF APPLICATION

SafeLine-EX is a set of best practice norms for professional and ethical conduct for external safe reporting service providers (hereafter 'service providers') operating their own facilities or centres that enable client organisations (hereafter 'clients') to report observed or perceived unethical conduct confidentially and anonymously.

OBJECTIVES OF SafeLine-EX

The objectives of SafeLine-EX are:

- > To strengthen the external safe reporting industry by establishing a best practice industry standard;
- > To provide quality assurance to organisations requiring external safe reporting services;
- > To create conditions in which would-be whistle-blowers can report misconduct with confidence;
- > To differentiate legitimate from non-legitimate service providers;
- > To discourage sub-standard service providers from entering the market; and
- > To certify service providers as a "TEI-Certified External Safe Reporting Service Provider".

BENEFITS OF SafeLine-EX CERTIFICATION

Complying with SafeLine-EX will help service providers to:

- > Organise their internal systems and processes;
- > Improve the efficiency of their internal systems and processes;
- > Continually improve their service delivery;
- > Create conditions in which would-be whistle-blowers are able to report with confidence; and
- > Provide assurance to client organisations in terms of:
 - o confidentiality of information,
 - o protection of whistle-blowers' identity,
 - o professional service delivery, and
 - o quality of reports.

NORMS OF SafeLine-EX

This Standard is based on five guiding norms for service providers, which balance client needs, whistle-blower interests and operational requirements. A description of each norm, the standards supporting it, and the conditions for compliance with it, are provided below.

>> Norm 1: INTEGRITY

A commitment to integrity requires that the service provider is honest, adheres to clear moral principles, and is professional. In order to demonstrate commitment to the norm of integrity, service providers must comply with three standards, namely (1) being honest, (2) ensuring that safe reporting contact centre staff are of a high ethical and professional standing, and (3) ensuring complete, accurate and truthful reporting and delivery of reports.

INTEGRITY	
Standard 1.1	<p>Having integrity means that service providers are honest and will, therefore:</p> <ul style="list-style-type: none"> i. Honour the letter and spirit of their contractual agreements; ii. Be transparent about the services they are able to provide; iii. Make no misrepresentations; iv. Ensure the contact centre pays all relevant licensing fees; v. Advise whistle-blowers using telephone call facilities up front that their calls will be recorded; vi. Pro-actively inform clients of problems relating to the delivery of, or changes in, the service; vii. Accept new clients only if the service provider has sufficient capacity to provide new clients with agreed-upon services; and viii. Possess the capacity to provide all services advertised.
Standard 1.2	<p>Having integrity means that service providers ensure that safe reporting contact centre staff are of a high ethical and professional standing. They will therefore:</p> <ul style="list-style-type: none"> i. Perform background checks on prospective employees which include, as a minimum, qualifications and certificates, criminal and incarceration records, past employer references, and character references to ensure that applicants' claims are honest and truthful; and ii. Conduct continual reviews of the quality of staff members' verbal methods of interacting with whistle-blowers in their efforts to obtain complete and accurate information.
Standard 1.3	<p>Having integrity means that service providers ensure complete, accurate and truthful reporting. They will therefore ensure that:</p> <ul style="list-style-type: none"> i. All relevant information provided by a whistle-blower is included in the report; ii. Reporting is objective and unbiased; iii. Staff do not solicit any other services related to the report; iv. Reporting is accurate; v. Reports are professionally presented; and vi. The anonymity and confidentiality of the whistle-blower is respected, in

accordance with the whistle-blower's preference.

>> Norm 2: EFFICIENCY

A commitment to efficiency requires that the external safe reporting service provider delivers high-quality information to clients in a timely manner. In order to demonstrate commitment to the norm of efficiency, service providers must comply with five standards, namely, (1) performing services in a timely manner, (2) ensuring that safe reporting contact centre staff are professionally trained to produce high-quality reports, (3) providing clients with customised service options, (4) assisting clients with awareness and communications initiatives, and (5) continually improving service.

EFFICIENCY	
Standard 2.1	<p>Being efficient means that service providers perform services in a timely manner. They will therefore:</p> <ul style="list-style-type: none"> i. Deliver reports to the authorised client representative(s) within 24 hours of receiving information from a whistle-blower, with the exception of weekends; ii. Have in place a channel for immediate emergency reporting of incidents; and iii. Perform other contracted services within agreed-upon timeframes.
Standard 2.2	<p>Being efficient means that service providers ensure that contact centre staff are professionally trained to produce high-quality reports. They will therefore ensure that contact centre staff:</p> <ul style="list-style-type: none"> i. Are professionally trained to: <ul style="list-style-type: none"> a) Provide information regarding the functioning of the safe-reporting facility; b) Explain the difference between confidential, partially confidential, and anonymous reporting; c) Write professional and comprehensive reports; d) Distinguish between good-faith and malicious reports; e) Conduct effective interviews (who, what, where, when and how); f) Obtain pertinent information from whistle-blowers, including detailed relevant information about the reported incident, as well as information requested by the client; and g) Understand the business of the client (for example, core operations, regions, subsidiaries and client-specific terminology); ii. Refer in their reports to the communication medium through which reports were received; iii. Link reports to previous reports about the same incident; iv. Are continually monitored and evaluated on their performance; and v. Are provided with relevant learning opportunities on an annual basis.
Standard 2.3	<p>Being efficient means that clients are provided with customised service options. Service providers will therefore customise to agreed-upon requirements with regard to:</p> <ul style="list-style-type: none"> i. Questionnaires/call sheets; ii. Whistle-blower reports; iii. Dashboards for other reports (such as monthly reports); and

	iv. Awareness and training material.
Standard 2.4	<p>Being efficient means that clients are assisted with awareness and communication initiatives. Service providers will therefore:</p> <ul style="list-style-type: none"> i. Provide customised training to client staff about the safe reporting facility on inception of a contract; ii. Provide customised awareness-raising material suitable to the client environment on inception of a contract; iii. Provide a customised awareness and communication plan for the safe reporting facility for the first year of a contract; iv. Follow up annually in writing or in person (in which case minutes of the meeting should be available) with the client to offer training and awareness material and/or services; and v. Advise clients at least annually in writing or in person (in which case minutes of the meeting should be available) on the importance of awareness and communication initiatives and on methods to maximise the efficiency and effectiveness of the safe reporting facility. These methods include: <ul style="list-style-type: none"> a) Obtaining top leadership (the Governing Body, Social and Ethics Committee, Audit Committee, or Executive Management) endorsement of the external safe reporting facility; b) Making available different reporting channel options for reporting misconduct; c) Publicising the functioning of the external safe reporting facility, with specific emphasis on measures to protect whistle-blowers' anonymity; d) Setting out the respective responsibilities of the service provider, client, and whistle-blower; and e) Publicising that the external safe reporting facility is independent of, and uncompromised by any undue influence from, the client organisation.
Standard 2.5	<p>Being efficient means that service providers continually improve their services. They will therefore:</p> <ul style="list-style-type: none"> i. Obtain bi-annual written feedback from clients about the quality of their service; ii. Stay abreast of technological developments in data management systems and advances in digital reporting; and iii. Act on client feedback to improve service delivery to clients.

>> Norm 3: INDEPENDENCE

A commitment to independence requires that the service provider remains free from conflicts of interest with their clients, clients' stakeholders and other service providers. Independence includes two standards that service providers must comply with, namely, (1) identifying, declaring and avoiding conflicts of interest, and (2) operating a self-contained safe reporting contact centre.

INDEPENDENCE	
Standard 3.1	<p>Being independent means that service providers identify, declare and avoid conflicts of interest. Protecting the interest of the whistle-blower is of prime importance and supersedes the interest of the client. Thus, the interest of the whistle-blower is the ultimate consideration in determining whether a situation presents a conflict of interest. Service providers will therefore:</p> <ul style="list-style-type: none"> i. Require annual declarations of independence from all staff of the safe reporting facility; ii. Identify, declare and avoid any contracts, agreements, arrangements or situations that could negatively affect the service provided to clients and whistle-blowers; and iii. Identify, declare and avoid any contracts, agreements, arrangements or situations that could create a perception of not being independent from clients.
Standard 3.2	<p>Being independent means that service providers operate a self-contained safe reporting facility. They will therefore:</p> <ul style="list-style-type: none"> i. Occupy facilities at a dedicated site or premises or in a dedicated area; and ii. Staff the contact centre with persons in their permanent employ.

>> **Norm 4: PROTECTION**

A commitment to protection requires that the service provider respects whistle-blowers' anonymity, as well as the confidentiality of their information, as applicable and appropriate, to prevent victimisation. Protection includes five standards, namely, (1) ensuring the security of the safe reporting contact centre facility, (2) ensuring that the location of the safe reporting contact centre is discreet, (3) guaranteeing whistle-blowers' anonymity, (4) assuring the confidentiality of communications received and reports delivered and (5) ensuring that information received through all communication channels is recorded and securely stored.

PROTECTION	
Standard 4.1	<p>Protecting whistle-blowers means that service providers ensure the security of the safe reporting contact centre facility. They will therefore ensure that:</p> <ul style="list-style-type: none"> i. Access to the facility is strictly monitored at all times; ii. Appropriate logistical and physical access controls are in place to protect infrastructure, networks, hardware and software; iii. Appropriate logistical and physical access controls protect information received from whistle-blowers, as well as reports to relevant client recipients; and iv. Visitors (including cleaning and security staff) and/or suppliers of services to the facility are monitored and supervised.
Standard 4.2	<p>Protecting whistle-blowers means that service providers ensure that the safe reporting contact centre is discreet. They will therefore ensure that:</p> <ul style="list-style-type: none"> i. The safe reporting contact centre is not identifiable with overt signage; and ii. External stakeholders, such as service providers and contractors, sign a register

	<p>confirming their presence in the safe reporting facility or area where the facility is located.</p>
<p>Standard 4.3</p>	<p>Protecting whistle-blowers means that service providers guarantee whistle-blowers’ anonymity and confidentiality. They will therefore ensure that:</p> <ul style="list-style-type: none"> i. There are no caller-line identification mechanisms in place to identify the originating telephone or fax number of the whistle-blower; ii. There are no IP address identification mechanisms in place to identify the originating email address of the whistle-blower; iii. Whistle-blowers are provided with the choice of: <ul style="list-style-type: none"> a) Remaining anonymous to the service provider and the client; b) Revealing their identity to the service provider, but remaining anonymous to the client; or c) Revealing their identity to the service provider and the client; iv. Reports to clients respect and protect whistle-blowers’ anonymity by voiding them of any identification data, including gender and position; v. Whistle-blowers’ confidentiality is protected in respect of third parties should they expressly request that their identity be revealed to the client, thus waiving their anonymity; vi. No recordings or transcripts of recordings are made available to clients unless ordered to do so by a court of law; and vii. In the case of reply-enabled communication channels, whistle-blowers receive unique reference numbers, case or user codes that are not stored at the backend.
<p>Standard 4.4</p>	<p>Protecting whistle-blowers means that service providers assure the confidentiality of communications received and reports delivered. Service providers will therefore ensure that:</p> <ul style="list-style-type: none"> i. All reports are delivered to the authorised client representative(s) only; ii. Appropriate logistical and physical access controls protect infrastructure, networks, hardware and software; iii. Appropriate logistical and physical access controls protect information received from whistle-blowers, as well as reports to clients; iv. Changes to authorised client representative(s) are verified in writing; and v. The confidentiality of information is secured by password protection or encryption of all reports sent via email to authorised client representative(s).
<p>Standard 4.5</p>	<p>Protecting whistle-blowers means that information received through all communication channels is recorded and securely stored. Service providers will therefore:</p> <ul style="list-style-type: none"> i. Invest in, and maintain, infrastructure to ensure that all information received is recorded; ii. Ensure that all information received is stored securely; and iii. Ensure that an audit trail is available of all communication with whistle-blowers.

>> Norm 5: AVAILABILITY

A commitment to availability requires that the service provider ensures easy and reliable access to the external safe reporting facility through a variety of channels, 24 hours per day, 365 days per year. Being available includes the following two standards that service providers must adhere to, namely, (1) guaranteeing the sustainability of the service, and (2) providing a choice of user-friendly communication channels 24 hours a day, 365 days a year.

AVAILABILITY	
Standard 5.1	<p>Being available means that service providers guarantee the sustainability of the service. They will therefore:</p> <ul style="list-style-type: none"> i. Set up and maintain continuity and disaster plans that are regularly tested; ii. Have appropriate and comprehensive insurance; and iii. Conduct regular integrity testing of systems, including the hosting application of websites available to whistle-blowers.
Standard 5.2	<p>Being available means that service providers provide a choice of user-friendly live communication channels 24 hours a day, 365 days a year. They will therefore:</p> <ul style="list-style-type: none"> i. Provide clients with a telephone number, fax number, postal address, email address, SMS or WhatsApp number, or website, for whistle-blowers to report misconduct; ii. Ensure that these communication channels are easily accessible and free of charge, if possible; iii. Provide services in the languages agreed to with the client; iv. Translate reports received in agreed-upon languages before sending to the client; v. Provide for live response to whistle-blowers 24 hours a day, 365 days a year (no answering machines or voice messages); vi. Staff the contact centre appropriately to ensure staff availability as agreed with clients; and vii. Ensure that whistle-blowers who report by telephone have their calls answered promptly and are not placed on hold for an unreasonable period that might cause whistle-blowers to abort calls.

SafeLine-EX CERTIFICATION

- 1 TEI will provide the Standard to any eligible service provider who wishes to apply for certification.
- 2 On submission of a completed application form, which entails a self-assessment against the Standard, TEI will conduct a preliminary assessment of the information. Additional information may be requested from the service provider.
- 3 Upon completion of the preliminary evaluation, TEI will conduct a site visit to the service provider's contact centre and any other relevant site(s). During this visit, the assessor will interview staff, observe operations, and review and inspect documentation to determine if the service provider complies with the Standard.
- 4 On completion of the assessment, the assessor will submit the final report for the service provider's attention. Recommendations for improvements will be included where necessary.
- 5 Service providers who adhere to all the norms and standards will receive a certificate of compliance, as well as the relevant logo banner from TEI. The certification will be valid for one year.

ABOUT THE ETHICS INSTITUTE

The Ethics Institute is an independent public institute producing original thought leadership and offering a range of services and products related to organisational ethics.

Visit our website at www.tei.org.za.

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