MYECCHO ETHICS HOTLINE AND CASE MANAGEMENT SYSTEM for Non-Profits

Congratulations!
By selecting MYECCHO, you have chosen a trusted, secure and confidential hotline for use by everyone connected to your organization.

Ethics
Working hard for a worthwhile cause…
You know that ethics is not a part of your business, it *is* your business. By way of values and guidelines, individual and organizational ethics guide behavior. Values and guidelines are instilled by your organization's culture and by your formal ethics program. Along with an ethics code and ethics training, an ethics hotline is an integral part of this program and your organization's broader Governance, Risk Management, and Compliance (GRC) efforts. That is why the US Department of Treasury encourages *"the board of directors to adopt an effective policy for handling employee complaints and to establish procedures for employees to report in confidence any suspected financial impropriety or misuse of the charity's resources* [i.e. an Ethics Hotline]*"* (see the Internal Revenue Service's Governance and Related Topics: 501(c)(3) Organizations).

TIPS FOR MANAGEMENT AND ADMINISTRATORS

Hotline communication
To make the most of your ethics hotline, it is important to communicate its availability and proper use to everyone from top management to temps.

MYECCHO recommends your ethics hotline is introduced in conjunction with an announcement or a reminder of your organization's policies and ethics code. This is typically done via a town hall meeting, an organization-wide email message, an article in your organization's newsletter, a handout (for example, flyer or wallet card) to employees, or at the end of ethics training. Be sure to consider all of the primary spoken languages and don't forget new hires. After the rollout, constant reminders of your ethics hotline are equally important. For example, posters should be placed conspicuously and in areas of high-traffic such as break rooms. Many organizations additionally choose to link the ethics hotline on the organization Intranet.

(Ask about customized ethics training and awareness material like wallet cards and posters!)

For maximum effectiveness, get top management's endorsement in all ethics hotline communication.

MYECCHO recommends during launch and follow-up communication of your ethics hotline, its purpose should be made clear. It should be apparent that your ethics hotline is not an emergency service; and that it does not substitute for existing channels such as face-to-face communication with one's supervisor or Human Resources. Your ethics hotline is an additional way for those connected with your organization to voice concerns in a secure, confidential and anonymous manner.

MYECCHO recommends you also explain the types of issues that can be raised via your ethics hotline in communication material:

- Accounting, internal accounting controls, or auditing matters
- Workplace issues (such as substance abuse, FLSA, FMLA)
- Environmental, health and safety concerns
- Falsification of documents (fabricating, altering, or destroying any part of a document such as a record for the purpose of gaining some advantage)
- Discrimination (age, disability, genetic information, national origin, pregnancy, race/color, religion, sex), harassment (written, verbal or physical; suggestive or direct) or violence
- Conflict of interest (when a personal interest influences the objective exercise of one's duties and obligations in his/her professional capacity; including related to gifts)
- Corruption, bribery, kickbacks
- Breach of confidentiality
- Theft or embezzlement (fraudulent appropriation of property or funds)
- Vandalism/destruction or improper use of the organization's property
- Inappropriate use of non-profit status
- Suggestion (or anonymous inquiry)

Finally, your ethics hotline's sustained effectiveness depends on communication in the form of the "tone at the top" and appropriate reaction to concerns including changes to internal policies.

Whistleblower protection

The greatest strength of your ethics hotline is the ability of employees to raise a concern anonymously, without fear of retaliation or reprisal.

MYECCHO recommends that a whistleblower protection policy is appended to organization policy or ethics code communication. At minimum, the whistleblower protection policy should contain:

- a statement that, when reported in good faith, whistleblowers will not be subject to any form of retaliation such as firing, demotion, harassment, or consideration for promotion, even if investigation findings do not support the nature of the complaint;
- reference to applicable laws such as the Sarbanes-Oxley Act of 2002 (SOX); and
- retaliation protection contact information such as the Office of the Whistleblower Protection Program administered by the US Department of Labor's Occupational Safety and Health Administration or OSHA (see www.osha.gov/dep/oia/whistleblower/index.html).

For maximum effectiveness, clearly communicate and document your whistleblower protection policy.

MYECCHO recommends the following additional measures to assure whistleblower protection:

- all of your ethics hotline information, including passwords and copies of reports, be kept in a secure environment;
- procedures are established for the proper handling of complaints by your ethics hotline administrators and others involved in the handling process;
- procedures are periodically reviewed with legal counsel;
- investigations are conducted in a timely manner and, if necessary, in consultation of legal counsel;
- during investigation of an incident, only necessary personnel are made involved and, unless needed, it is not revealed that the inquiry is in reaction to a tip (disclosure of which may be a breach of confidentiality and may put the whistleblower at risk); and
- the outcome of an ethics hotline investigation, including disciplinary action or changes to internal policies, is carried out with consideration of whistleblower protection.

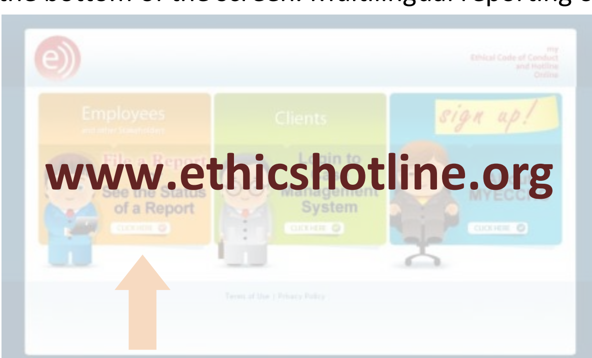
HOW TO USE YOUR ETHICS HOTLINE

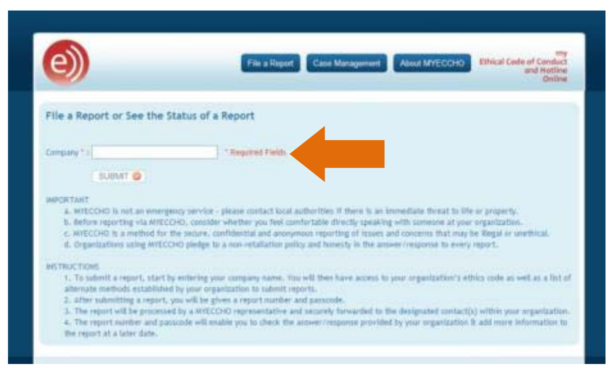
MYECCHO was developed with the user in mind

The site layout, instructions and content were designed to make reporting easy and least intimidating. The same is true for our phone prompts. (Ask about your customized landing page and phone prompts!)

Employees: It's as easy as 1, 2 and 3!

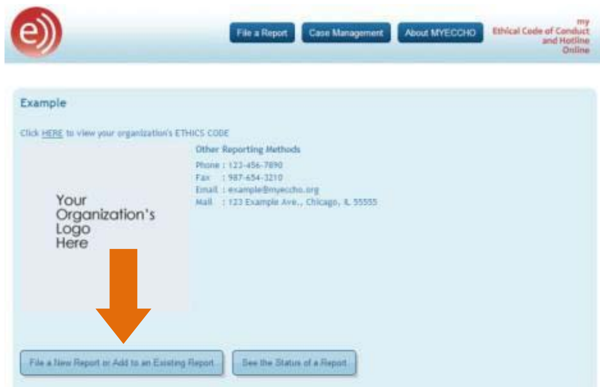
1. Employees/users go to www.ethicshotline.org to enter the "File a New Report or See the Status of an Existing Report" area and enter your organization name. See the important notes and instructions on the bottom of the screen. Multilingual reporting options are available from this screen.



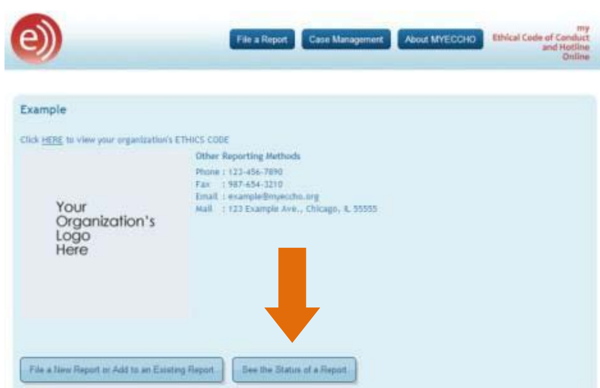


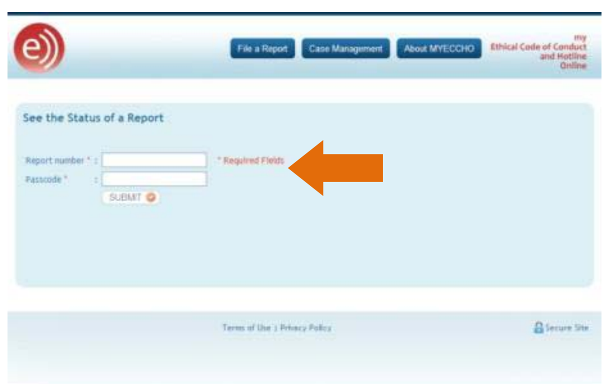
Make sure you call out the organization name used for login in all of your ethics hotline communication.

2. Users see your organization logo, can click the link to see your ethics code, and are made aware of other methods your organization has in place to report ethics concerns. After clicking on “File a New Report or Add to an Existing Report”, users are prompted to enter details about the concern. They can choose to remain anonymous or enter their name and contact information. The last step is entering a passcode. After hitting “Submit”, the passcode is displayed along with a unique report number. The user is asked to keep the report number and passcode in a safe place so that they can enter a follow-up report or see the status of the report.



3. Users can see your organization’s response to their concern by clicking on “See the Status of a Report.” After entering his/her report number and passcode and hitting “Submit”, the user is taken to a confidential screen which shows the status of the report, including all of the responses entered by your organization. Phone method users receive a unique report number and passcode and also see report status here.

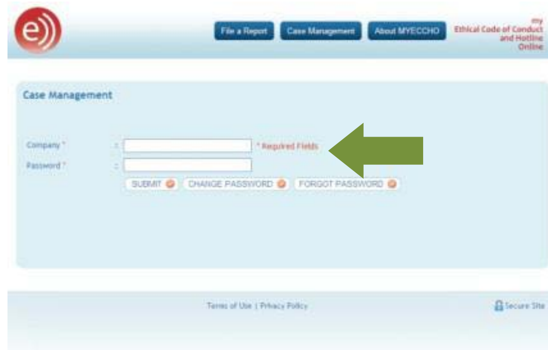




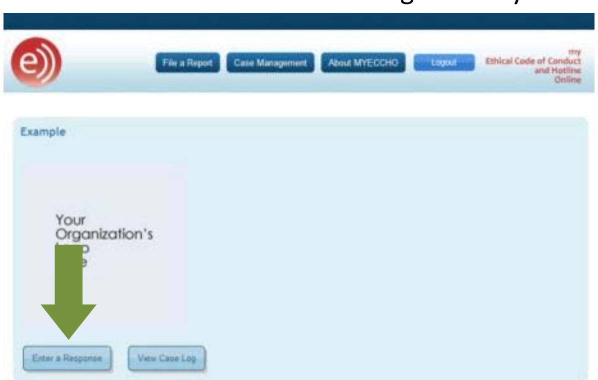
Seek legal advice before use of ethics hotline outside of the US - privacy laws vary country to country.

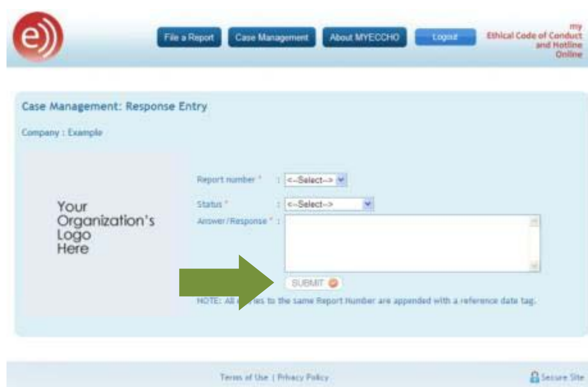
Administrators: It's as easy as 1, 2 and 3!

1. Administrators enter the "Case Management" area and enter your organization name and password. Your organization's administrator password can also be updated from this screen.



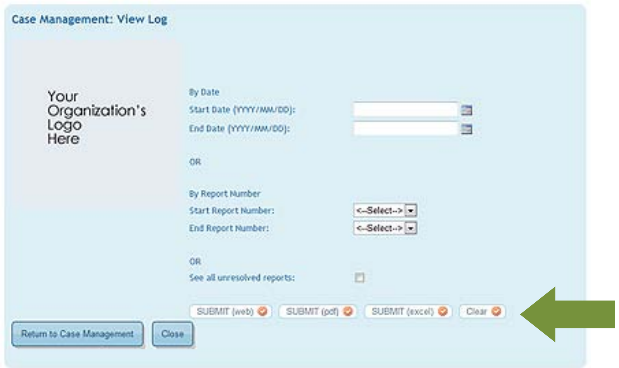
2. Administrators will receive an email whenever a new report is entered, regardless of the entry method (Internet, phone, etc.). Phone reports contain a transcript of the message. Depending on your organization's setup, multiple people may receive a "new report notice" email; also, a two-tier system may be in place (e.g., for reports dealing with an accounting matter, a notice is sent directly to the audit committee). Clicking on "Enter a Response" takes you to a screen that allows you to select a report and enter a response. When selecting a report number, it will open for display. All administrator responses are logged with a date stamp. Clicking on "Submit" will take you to a screen that confirms that a record has been added to the case management system.





Organizations using MYECCHO pledge to a non-retaliation policy and honesty in response to reports.

3. To see all the reports in your organization's case management system, click on "View Case Log." The next screen gives the option of viewing reports by date, by case number, or by status. Go to a screen with customizable views; or output logs in PDF or Excel formats. This on-demand case management system facilitates your organization's ability to analyze incident data, manage your CAPA/resolution process, and help auditing functions.



WE'RE HERE TO HELP!

The beginning of a beautiful (and ethical) relationship

Where did we begin? Yes - ethics *is* your business. But we know you can use some help. And that's why we're here. Contact us any time with questions, comments (or just to say hi!).

Your Representative	*Contact Number, Email*
Login	*Toll-free Number*
Image Instructions	*Phone Prompts*
Ethics Code Instructions	*Start Date*
Comments	

MYECCHO
1-888-384-4262
www.myeccho.org
info@myeccho.org
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