

## TIPS & POINTERS FOR DRAFTING AN ANONYMOUS REPORTING POLICY

A clear, easy to understand anonymous reporting policy is critical for an effective compliance program. Take a critical look at your anonymous reporting policy. Ask yourself these questions:

- How does the process attempt to ensure anonymity for the reporter? Is this explained to the reader?
- Are there limitations on maintaining anonymity based on the reporting process and is there an alternative mechanism available?
- Does the policy address the limitations of an anonymous report on the organization's ability to investigate to encourage the reporter to relay all pertinent information?

**If you use a compliance hotline monitored by someone internally, consider including language similar to the following:**

*“You can anonymously report a concern by calling our compliance hotline. This hotline is monitored by our compliance officer. If you are not comfortable with leaving a message, you can send an anonymous written concern to the following address: \_\_\_\_\_ ATTN: COMPLIANCE OFFICER”*

**If you are using an outside company to monitor your hotline, consider language similar to the following:**

*“You can anonymously report a compliance concern by calling our compliance hotline which is monitored by an outside, third party. They will transcribe your message and forward it to our compliance officer to help maintain your anonymity.”*

**All policies should remind the reader not to share their identifying information, such as including something similar to the following:**

*“If you wish to remain anonymous, do not share your name or other information. For example, if you are sending a report via email and wish to remain anonymous, understand that your email address will be visible to the Compliance Officer.”*

**The reader should understand the limits of the anonymous reporting process. Consider including language such as:**

*“Please understand that reporting a concern anonymously may hinder our ability to fully investigate and resolve the issue. To assist us, it is important that you provide as many details as you can about your concern since we will not be able to contact you for further information. This includes sharing not just the specific concern but all facts relevant to the concern, including names of people who may have information regarding this issue and who we should talk to as part of our investigation.”*

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