



SAFE REPORTING SERVICE PROVIDER  
STANDARD: **INTERNAL**

>> SafeLine - IN <<

The best practice standard for internal safe reporting services.  
Developed by The Ethics Institute.

## INTRODUCTION

The Safe Reporting Standard Internal (SafeLine-IN) is a best practice standard that specifies requirements for a quality safe reporting system managed internally by an organisation. Organisations use the standard to demonstrate their ability to consistently provide a quality service that protects whistle-blowers. The standard should be seen as a business management tool that organisations can use to improve whistle-blowing operations, and to reduce operational and reputational risks.

## SCOPE OF APPLICATION

SafeLine-IN is a set of best practice norms for organisations to operate their own internal safe reporting facility professionally and ethically, to ensure that both internal and external stakeholders are able to report observed or perceived unethical conduct confidentially and anonymously.

## OBJECTIVES OF SafeLine-IN

The objectives of SafeLine-IN are:

- > To strengthen internal safe reporting facilities by establishing a best practice standard;
- > To provide quality assurance to organisational stakeholders who require internal safe reporting services;
- > To create conditions in which would-be whistle-blowers are able to report misconduct with confidence;
- > To discourage sub-standard service provision from internal safe reporting facilities; and
- > To provide assurance that internal safe reporting facilities meet the requirements of the norms and standards of SafeLine-IN.

## BENEFITS OF SafeLine-IN ASSURANCE

Complying with SafeLine-IN will help organisations to:

- > Organise their internal safe reporting systems and processes;
- > Improve the efficiency of their internal safe reporting systems and processes;
- > Continually improve their service delivery in relation to safe reporting;
- > Improve stakeholders' perception of the organisation's safe reporting facility;
- > Create conditions in which would-be whistle-blowers are able to report with confidence; and
- > Provide assurance to potential users of organisations' safe reporting facilities in terms of:
  - o confidential handling of information,
  - o protection of whistle-blower's identity,
  - o professional service delivery, and
  - o quality of reports.

## NORMS GUIDING SafeLine-IN

This Standard is based on five guiding norms, for organisations providing their own internal safe reporting facility, which balance stakeholder needs, whistle-blower interests and operational requirements. A description of each norm, the standards that support it, and the conditions for compliance with it, are provided below.

### >> Norm 1: INTEGRITY

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

INTEGRITY	
<b>Standard 1.1</b>	<p><b>Having integrity means that internal service providers are honest and will, therefore:</b></p> <ul style="list-style-type: none"> <li>i. Be transparent about their procedures and processes;</li> <li>ii. Make no misrepresentations; and</li> <li>iii. Where safe reporting facilities record calls, advise whistle-blowers using telephone call facilities up front that their calls will be recorded.</li> </ul>
<b>Standard 1.2</b>	<p><b>Having integrity means that internal service providers ensure that whistle-blowing facility staff are of a high ethical standing. They will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Perform background checks on prospective employees which include, as a minimum, verification of qualifications and certificates, criminal and incarceration records, past employer references, and character references, to ensure that applicants' claims are honest or truthful; and</li> <li>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.</li> </ul>
<b>Standard 1.3</b>	<p><b>Having integrity means that internal service providers ensure complete, accurate and truthful reporting. They will therefore ensure that:</b></p> <ul style="list-style-type: none"> <li>i. All relevant information provided by a whistle-blower telephonically, via e-mail or letter, or in person is included in the report;</li> <li>ii. Reporting is objective, accurate and unbiased;</li> <li>iii. The anonymity and confidentiality of the whistle-blower is respected, in accordance with the whistle-blower's preference; and</li> <li>iv. Reports are professionally compiled and presented.</li> </ul>

### >> Norm 2: EFFICIENCY

A commitment to efficiency requires that the internal safe reporting service provider delivers high-quality information to stakeholders in a timely manner. In order to demonstrate commitment to the norm of efficiency,

internal service providers must comply with four standards, namely, (1) performing services in a timely manner, (2) ensuring that safe reporting facility staff are professionally trained to produce high-quality reports, (3) creating awareness of the internal safe reporting facility, and (4) continually improving service.

EFFICIENCY	
<b>Standard 2.1</b>	<p><b>Being efficient means that internal service providers perform services in a timely manner. They will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Acknowledge receipt of whistle-blowing reports within the period as required by the Protected Disclosures Act (as amended in 2017);</li> <li>ii. Deliver reports to investigative and other relevant divisions within 24 hours of receiving information from a whistle-blower;</li> <li>iii. Have in place a channel for immediate emergency reporting of incidents;</li> <li>iv. Provide feedback to whistle-blowers within the period as required by the Protected Disclosures Act (as amended in 2017); and</li> <li>v. Capture reports on a data management system within 24 hours.</li> </ul>
<b>Standard 2.2</b>	<p><b>Being efficient means that internal service providers ensure that staff are professionally trained to produce high-quality reports. They will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Ensure that staff are professionally trained to:                             <ul style="list-style-type: none"> <li>a) provide information regarding the functioning of the safe-reporting facility;</li> <li>b) explain the difference between confidential, partially confidential, and anonymous reporting;</li> <li>c) write professional and comprehensive reports;</li> <li>d) distinguish between good-faith and malicious reports;</li> <li>e) conduct effective interviews (who, what, where, when and how);</li> <li>f) extract pertinent information from whistle-blowers, including detailed and relevant information about the reported incident; and</li> <li>g) understand the business of the organisation (for example, core business operations, regions, subsidiaries and organisation-specific terminology);</li> </ul> </li> <li>ii. Refer in their reports to the communication medium through which reports were received;</li> <li>iii. Link reports to previous reports about the same incident;</li> <li>iv. Continually monitor and evaluate performance of the internal facility’s staff; and</li> <li>v. Make relevant learning opportunities available to staff on an annual basis.</li> </ul>
<b>Standard 2.3</b>	<p><b>Being efficient means that internal and external stakeholders are made aware of the internal safe reporting facility. Internal service providers will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Develop annual awareness and communication plans of the safe reporting facility;</li> <li>ii. Provide training to staff of the organisation about the safe reporting facility;</li> <li>iii. Provide awareness material;</li> <li>iv. Obtain, at least annually, top leadership (the Governing Body, Social and Ethics Committee, Audit Committee, or Executive Management) endorsement of the internal safe reporting facility;</li> <li>v. Publicise on internal and external platforms – such as the organisation’s website and intranet, as well as in a whistle-blowing policy – the functioning of the internal safe reporting facility, with specific emphasis on measures taken to protect whistle-blowers’ anonymity and the confidentiality of information; and</li> </ul>

	vi. Publicise on internal and external platforms – such as the organisation's website and intranet, as well as in a whistle-blowing policy – the respective responsibilities of the internal service provider and whistle-blowers.
<b>Standard 2.4</b>	<p><b>Being efficient means that internal service providers continually improve their services. They will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Obtain, at least annually, written feedback from stakeholders about the quality of the service;</li> <li>ii. Stay abreast of technological developments in data management systems and advances in digital reporting; and</li> <li>iii. Act on stakeholders' feedback to better serve their needs.</li> </ul>

>> **Norm 3: INDEPENDENCE**

A commitment to independence requires that the internal service provider remains free from undue influences. Independence includes two standards that the internal service provider must comply with, namely, (1) identifying, declaring and avoiding conflicts of interest, and (2) operating a self-contained safe reporting facility.

INDEPENDENCE	
<b>Standard 3.1</b>	<p><b>Being independent means that internal 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 staff of the internal safe reporting facility and of the organisation. Internal service providers will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Require annual declarations of independence from all staff of the safe reporting facility;</li> <li>ii. Identify, declare and avoid any agreements, arrangements or situations that could negatively affect the service provided to stakeholders and whistle-blowers; and</li> <li>iii. Identify, declare and avoid any agreements, arrangements or situations that could create a perception of not being objective.</li> </ul>
<b>Standard 3.2</b>	<p><b>Being independent means that internal service providers operate a self-contained safe reporting facility. They will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Occupy a facility at a dedicated site or premises or in a dedicated area; and</li> <li>ii. Staff the facility with persons dedicated to the safe reporting facility.</li> </ul>

>> **Norm 4: PROTECTION**

A commitment to protection requires that the internal service provider respects whistle-blowers' anonymity, as well as the confidentiality of their information, as applicable and appropriate, to prevent victimisation, and to encourage use of the internal safe reporting facility. Protection includes three standards, namely, (1) ensuring

the security of the safe reporting facility, (2) guaranteeing whistle-blowers' anonymity, and (3) assuring the confidentiality of communications received and reports delivered.

<b>PROTECTION</b>	
<b>Standard 4.1</b>	<p><b>Protecting whistle-blowers means that internal service providers ensure the security of the internal safe reporting facility. They will therefore ensure that:</b></p> <ul style="list-style-type: none"> <li>i. Access to the facility is strictly monitored at all times;</li> <li>ii. Appropriate logistical and physical access controls are in place to protect infrastructure, networks, hardware and software;</li> <li>iii. Appropriate logistical and physical access controls protect information received from whistle-blowers, as well as reports to relevant organisational recipients;</li> <li>iv. External stakeholders, such as service providers and contractors, sign a register confirming their presence in the safe reporting facility or area where the facility is located; and</li> <li>v. Visitors (including cleaning and security staff) and/or suppliers of services to the facility are monitored and supervised.</li> </ul>
<b>Standard 4.2</b>	<p><b>Protecting whistle-blowers means that internal service providers guarantee whistle-blowers' anonymity and confidentiality. They will therefore ensure that:</b></p> <ul style="list-style-type: none"> <li>i. There are no caller-line identification mechanisms in place to identify the originating telephone or fax number of the whistle-blower;</li> <li>ii. There are no IP address identification mechanisms in place to identify the originating email address of the whistle-blower;</li> <li>iii. Whistle-blowers are provided with the choice of:             <ul style="list-style-type: none"> <li>a) Remaining anonymous to the organisation;</li> <li>b) Revealing their identity to the internal service provider, but remaining anonymous to the rest of the organisation; or</li> <li>c) Revealing their identity to the internal service provider and the rest of the organisation;</li> </ul> </li> <li>iv. Reports to investigative and other relevant divisions respect and protect whistle-blowers' anonymity by voiding them of any identification data – including gender and position;</li> <li>v. Whistle-blowers' confidentiality in respect of third parties is protected should they expressly request that their identity be revealed to the organisation, thus waiving their anonymity;</li> <li>vi. Recordings or transcripts of recordings are not made available to any person in the organisation unless ordered to do so by a court of law; and</li> <li>vii. In the case of reply-enabled communication channels, whistle-blowers are provided with unique reference numbers, case or user codes, that are not stored at the backend, should they wish to seek feedback from the internal service provider regarding their report.</li> </ul>
<b>Standard 4.3</b>	<p><b>Protecting whistle-blowers means that internal service providers assure the confidentiality of communications received and reports delivered. Service providers will therefore ensure that:</b></p> <ul style="list-style-type: none"> <li>i. All reports are delivered to authorised and appropriately senior divisional representative(s) only; and</li> </ul>

	<ul style="list-style-type: none"> <li>ii. The confidentiality of information is protected by password-protecting or encrypting all reports sent via email to authorised organisational recipients.</li> </ul>
<b>Standard 4.4</b>	<p><b>Protecting whistle-blowers means that information received through all communication channels is recorded and securely stored. Service providers will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Invest in, and maintain, infrastructure to ensure that all information received is recorded;</li> <li>ii. Ensure that all information received is stored securely; and</li> <li>iii. Ensure that an audit trail is available of all communication with whistle-blowers.</li> </ul>

>> **Norm 5: AVAILABILITY**

A commitment to availability requires that the internal service provider ensures easy and reliable access to the internal 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	
<b>Standard 5.1</b>	<p><b>Being available means that internal service providers guarantee the sustainability of the service. They will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Set up and maintain continuity and disaster plans that are regularly tested;</li> <li>ii. Have appropriate and comprehensive insurance for the internal reporting facility; and</li> <li>iii. Ensure regular integrity testing of systems, including the hosting applications of websites available to whistle-blowers.</li> </ul>
<b>Standard 5.2</b>	<p><b>Being available means that internal service providers provide a choice of user-friendly communication channels 24 hours a day, 365 days a year. They will therefore:</b></p> <ul style="list-style-type: none"> <li>i. Provide internal and external stakeholders with a telephone number, fax number, postal address, email address, SMS or WhatsApp number or website for whistle-blowers to report misconduct;</li> <li>ii. Ensure that these communication channels are easily accessible and free of charge, if possible;</li> <li>iii. Provide for live response to whistle-blowers 24 hours a day, 365 days a year (no answering machines or voice messages);</li> <li>iv. Staff the safe reporting facility appropriately to ensure staff availability; and</li> <li>v. 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.</li> </ul>

## SafeLine-IN ASSURANCE

- 1 TEI will provide assurance on the Safeline-IN standard to any eligible internal service provider who wishes to submit themselves to an assurance audit.
- 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 internal service provider's facility 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 internal service provider complies with the Standard.
- 4 On completion of the assessment, the assessor will submit the final report for the internal service provider's attention. Recommendations for improvements will be included where necessary.
- 5 Successful internal service providers will receive an assurance statement, as well as the relevant logo banner from TEI.

## 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](http://www.tei.org.za).

For enquiries about SafeLine – IN or any other services, contact Liezl Groenewald at [liezl@tei.org.za](mailto:liezl@tei.org.za) or call 012 342 2799.

building an  
**ethical**  
SOCIETY