



NAVEX[®]

2023

Risk & Compliance
**Hotline &
Incident
Management**

■ Benchmark Report

Contents

Introduction	2
How We Calculate Our Benchmark Metrics	3
Executive Summary	4
Key Findings	12
1. Report Volume	13
2. Report Intake Method	21
3. Report Benchmark Categories & Issue Types	23
4. Anonymous vs. Named Reporting	33
5. Follow-Up Rate to Anonymous Reports	40
6. Substantiation Rate	42
7. Case Closure Time	50
8. Time Difference Between Incident & Report Date	60
9. Report Outcomes	63
10. Appendix	66
About the Authors	72



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Introduction

An efficient and trusted mechanism by which employees can anonymously or confidentially report allegations of suspected or actual misconduct is the hallmark of a well-designed compliance program.¹

Ongoing analysis and benchmarking of reporting data helps organizations answer crucial questions about their risk and compliance program including:

- Do employees know about our reporting channels?
- Are our communications reaching the intended audience and having the desired effect?
- Does our culture support employees who raise concerns?
- Are our investigations thorough and effective?
- Do we need more training on risk areas, reporting processes or fear of retaliation?
- Do we need to review or update our policies?

Tracking internal data to help answer these questions is important. Getting a broader perspective on how your performance matches up to market and industry norms is invaluable.

NAVEX also offers custom benchmarking reports of this data through GRC Insights[™]

The GRC Insights reports provide a closer cut of our data by industry, company size and more. Visit our website or reach out to an account executive to learn more about this service.

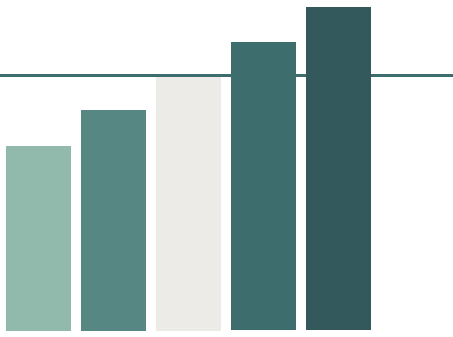
¹ Evaluation of Corporate Compliance Programs." U.S. Department of Justice, Criminal Division, June 2020, p6. <https://www.justice.gov/criminal-fraud/page/file/g37501/download>

To help, NAVEX anonymizes the data collected through our reporting and incident management systems every year and creates this report to share with all organizations – not just our customers. Because we have the world's largest and most comprehensive database of reports and outcomes, risk and compliance professionals trust our benchmarks to help guide decision making and better understand how their programs stack up. This 2023 report represents data collected from reports received in calendar year 2022. For each benchmark provided in this report you'll find:

- A description of the benchmark
- Instructions on how to calculate the benchmark
- The 2022 combined data for all industries in the NAVEX database with prior year comparisons
- Key findings and recommendations for organizations

This annual report is an important resource for organizations committed to benchmarking and improving program effectiveness.





How We Calculate Our Benchmark Metrics

For statistical accuracy, our analysis includes only those organizations that received 10 or more reports in all of 2022. The resulting database includes **3,430** organizations that received a total of **1.52 million** individual reports.

To remove the impact of outliers that might skew the overall reporting data, we calculate each benchmark metric for each organization, then identify the median (midpoint) across the total population. The resulting value – identified in charts throughout this report as the **Median Reporting Value** or **MRV** – allows us to create a clearer picture of what is happening in our customers’ organizations, as well as to provide organizations with benchmarking data that is not skewed by organization size.

In some cases, we provide the **Mean** value as additional information. We also have some data presented using **Frequencies** (percentages of total). Keep in mind, frequencies have been rounded, and may not add up to exactly 100%. All data presented is clearly marked with the calculation methodology. A more detailed discussion of the calculation methodology, distributions, assumptions and implications of each is presented in the appendix to this report.

There are no “right” outcomes in benchmarking reporting data. By definition, a median or midpoint means that half the organizations are higher, and half are lower than the MRV. Where appropriate in

this report, we provide what we consider to be an acceptable range of results to provide context for your own data.

Falling within the range generally indicates an organization is on par with medians for the organizations within our database. Falling outside the normal range, in either direction, is a good prompt to take a closer look at whether there is an issue that needs more attention from the organization.

New this year, in addition to the full range provided for key metrics (the central 80%), we have provided additional information on the central 50% range of the distribution within the full ranges to better reflect the concentration of report data.

Also new to this year’s report:

- Refined *Benchmark Categories/Issue Types*
- Additional data points and ranges for some metrics
- Additional decimal places provided for some key metrics
- Additional data by organizational size
- Further exploration into more specific *Issue Types*
- Same-day case closures by *Issue Type*
- Refined calculation methodology for *Substantiation Rates*

IMPORTANT NOTE: This year, the NAVEX data science team has completed a detailed review of all our calculation methodologies. In some cases, this has led to the refinement of some previously reported metrics. This will be most notable in metrics related to *Substantiation Rate* but also affects several others. Any metrics where an update has been made to a prior year data point will be noted as “refined.” These refinements will be our baseline for all future reporting.



This **2023 Hotline & Incident Management Benchmark Report** is a window into the signals risk and compliance leaders can watch while working to turn those inputs into positive cultural outcomes. It examines these trends and others for 1.52 million reports across the globe. It is a cultural temperature reading for 52 million employees and 3,430 organizations, and provides valuable insight to assess how individual programs are performing compared to their peers.

Executive Summary

In contrast to a year of seemingly emboldened whistleblowing during 2021's Great Resignation, 2022 incident and reporting data suggest a more cautious workforce in a period of greater economic uncertainty. With higher levels of reporting, fewer named reports and a strong focus on workplace culture issues, a picture emerges where reporters may be less confident in their external job prospects and more invested in the long-term dynamics of their current organizational cultures.

Organizations that pivoted to temporary remote- and hybrid-work models during the pandemic are likely settling on long-term plans for their workplaces, giving employees more clarity on their work locations. It is possible this helped inspire more reporters to speak up about workplace culture issues as their workplace dynamics became more consistent. It is also evident the personal stresses of the last few years are impacting the workplace and warrant attention.



We mapped nearly 22,000
Issue Types used by customers.

This report reflects the results of a months-long NAVEX initiative involving our in-house team of data scientists and subject-matter experts. This team reviewed the mapping of nearly 22,000 *Issue Types* used by our customers, enhanced the analysis methodologies of our incident reporting data and developed new metrics that are included in this year's report. The *Issue Type* mapping process led to reporting on 24 *Issue Types* contained within our original six *Benchmark Categories*. We believe these results and this report represent the gold standard for data analytics in our industry and are proud to offer these insights to the risk and compliance community.

In reviewing our 2022 data, we identified four major themes for consideration:

1 Reporting at highest levels ever, but reporters are proceeding with more caution and, in some cases, reporting outside their organizations

In 2022, we saw the highest median level of *Reports per 100 Employees* (1.47) in the history of this report. And when looking at the distribution frequency of reporting, we found that 21% of organizations received five or more *Reports per 100 Employees*, representing the greatest share of the distribution. Further, organizations that track reports from all sources, not just the phone and web intake, have visibility into nearly double the volume of reports, making trend and issue spotting easier. This is positive for organizations.

However, while report volume was higher, 2022 also brought the return of a higher percentage of anonymous reports, indicating more caution and potentially more concerns about retaliation on the part of reporters.



While trending gradually downward over more than a decade, anonymous reporting levels dropped in 2021 to 50% as a seemingly emboldened workforce was more willing to put a name behind reports. That shift may have been isolated to 2021 because in 2022, the share of anonymous to named reports was more consistent with historic levels and, at 56%, appreciably higher than the previous year. This comes amid the retreat of the Great Resignation era, and more concerns about the economic conditions. Specifically, organizations saw a median 72% of their web-based intake reports as anonymous and 53% of their hotline-based intake as anonymous.

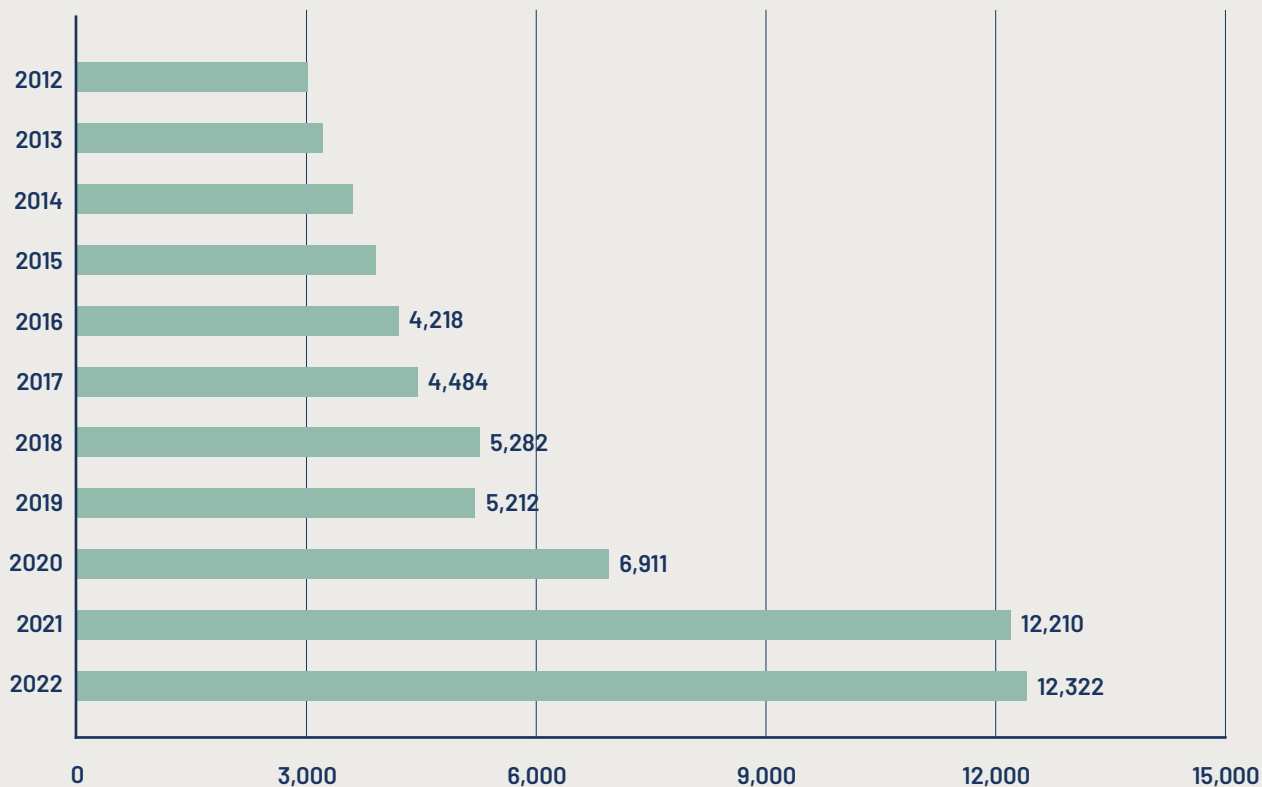
While this report is focused on internal reporting, organizations cannot lose sight of the shifting landscape of external reporting. Whistleblowers have shown in recent years that they are more willing to take their concerns outside the organization if the issue is not addressed in a timely and appropriate

way, as evidenced by the high levels of reporting to the SEC Office of the Whistleblower, as well as the growth of social media sites like Glassdoor. The SEC Office of the Whistleblower continues to report a record number of global tips as shown below.²

External reporting, whether it be to regulatory agencies or on social media postings, will continue to influence how organizations need to communicate about, and manage, their internal reporting system.

Addressing fear of retaliation head-on and regularly remains critical to prevent the loss of an opportunity to address a matter internally first. The frequency of retaliation reports, the enemy of a speak-up culture, increased from 0.78% in 2021 to 0.96% in 2022.

Considered alongside the rebound in anonymous reporting rates, risk and compliance professionals should assess whether their organization is doing enough to ensure reporting parties trust the system without fear of retaliation.



2. Source: SEC Office of the Whistleblower, 2022 Annual Report to Congress on the Dodd-Frank Whistleblower Program, <https://www.sec.gov/whistleblower/reports-and-publications/annual-reports/2022-annual-report-congress-dodd-frank>

2 More granular analysis of 24 Issue Types reveals workplace stresses as well as the impact of external priorities and events

This year, we have provided significant additional data points for 24 *Issue Types* contained within our original six *Benchmark Categories*. This deeper dive has revealed some notable findings. As has been typical throughout the years, the median organization saw most of its reports, 53.8%, in the major *Benchmark Category* of HR, Diversity & Workplace Respect in 2022, up from 50.0% in the prior year. However, when looking at the frequency of reporting across the more granular 24 *Issue Types*, we can see more specifically how workplace stresses and pressures are appearing.

In 2022, NAVEX separated out a new *Issue Type*, Workplace Civility, that previously was captured in Other HR. This *Issue Type* encompasses reports related to abusive or disrespectful behavior at work that are not harassment or discrimination, such as bullying and abuse of power. This metric is important to watch as a measure of cultural health and potentially a measure of mental health. The frequency of reports that fall into the Workplace Civility category increased to 6.9% in 2022 versus the back-calculated 6.4% in 2021. It was also the fourth most frequent *Issue Type* for reports overall.

In addition, the data shows the frequency of Harassment, Discrimination, Retaliation, Workplace Civility and Substance Abuse reports in 2022 all increased. When also considering the highest-frequency issue was Health and Safety reports – and this *Issue Type* includes concerns such as a threat of assault or violence – we have a red flag for organizations.

Internal reporting systems serve as an emotional lifeline in some cases. Noting that many compliance programs view human resource matters as “not compliance issues,” it may be time to raise the profile of these matters within the compliance program and partner closely with Human Resources teams who are already well-aware of the increase in mental health issues facing their organizations.

The impact of external priorities, events and interactions was evident with this more granular review as well. The frequency of Bribery and Corruption reports increased in 2022, as did Product Quality and Safety. Conflicts of Interest reporting dropped significantly but is still in the top five. Data Privacy and Protection also made the top five, and we expect this to increase as consumers and regulators heighten their focus on data privacy.

Issue Type analysis by *Substantiation Rate* is also a rich area for more specific review, and some areas stand out. The frequency of substantiation of Political Activity reports fell from 46% to 17%, which is interesting given 2022 was a mid-term election year. Workplace Civility held roughly steady at 45%. *Substantiation Rates* for issues categorized as Environment rose from 57% to 71%.

In 2022, the five *Issue Types* representing the highest frequency of substantiation were:

- Global Trade: **76%**
- Imminent Threat to a Person or Property: **75%**
- Environment: **71%**
- Data Privacy and Protection: **68%**
- Misuse or Misappropriation of Assets: **67%**
- Health and Safety: **65%**

Noting the frequency of Imminent Threat to a Person or Property case substantiation of 75%, these cases are obviously top priority. We also observed that only 4% of these reports were anonymous.

3 People still want to talk to a person when they have a concern, but they are more likely to experience a substantiated outcome when they write it down and submit their report via the web

Phone intake not only remains a critical channel for all incident management programs – the share of reports taken by phone has grown. The median percentage of reports taken via phone rose from 31% in 2021 to 33% in 2022. This seems to contradict trends in general day-to-day communication that are more often electronic, i.e., texting, and other instant messaging apps.

Relatedly, the volume of Other intake – which includes intake channels such as walk-in reports – has been declining. This is likely attributable to more remote work. A metric to watch, however, is the

uptick in median web intake in 2022, where a typical organization sees half of its reports come in via the web. This is significant for two reasons.

First, web reports are more likely to be anonymous, which makes sense as there is no rapport building that occurs via the web as compared to speaking directly with a person. Rapport building often leads to a named report. A typical organization saw 72% anonymity in their web intake in 2022, compared to 53% for their hotline.

Second, and most notable here, web reports are more likely to be substantiated than phone reports, and this has been consistent over the last three years. In 2022, the median *Substantiation Rate* for web reports was 39% compared to 33% for phone.

Perhaps the key takeaways are people who have a concern, and most often are upset or angry, prefer to share this directly with a person. But taking the time to thoughtfully write down their experiences or observations provides a more actionable report regardless of whether the reporter is anonymous. (This is another reminder of the value of accepting anonymous reports.)



A typical organization saw 72% anonymity in their web intake in 2022, compared to 53% for their hotline.

4 **Size matters – smaller organizations have different intake and outcome trends than their bigger counterparts; mid-size companies are experiencing some challenges**

With significant new data this year provided by organizational size, we can demonstrate what compliance officers have always known and regulators acknowledge – every company is different, and every program is different. And processes that are effective for a large organization may not be as effective for a smaller one.

At 2.99 *Reports per 100 Employees*, the smallest organizations – those with fewer than 2,500 employees – had, by far, the greatest reporting volume across the size spectrum in 2022. This compares to 1.37 *Reports per 100 Employees* for organizations with between 50,000 and 99,999 employees, the next-largest-volume size cohort in 2022. Organizations with over 100,000 employees experienced a significant reporting increase over 2021, but still only had 1.20 *Reports per 100 Employees*. This is likely attributable to larger organizations having more designated local resources capturing a higher percentage of reports directly.

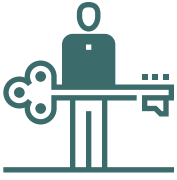
Organizations with fewer than 10,000 employees saw relatively higher rates of anonymous reporting than the larger organizations in our database in 2022. The greatest rates were in the 2,500-to-5,999 range, at 60% anonymity. The scale tips toward named reporting for the largest of organizations, with those with 50,000 or more employees seeing 45% to 48% anonymity. The higher anonymity rates here did not seem to impact *Substantiation Rates*, once again highlighting the value of anonymous reports.

Takeaways by organization size

Small organizations: *Substantiation Rates* were highest for the smallest organizations (even with high anonymity), with those under 2,500 employees registering a 47% *Substantiation Rate*. No other organizational size cohort registered greater than 42% substantiation. It should be noted that this finding comes amid an important distinction for smaller organizations – even a single substantiated report can have a disproportionately significant impact. However, considered alongside the fact that smaller organizations are seeing the largest *Report Volume per 100 Employees*, a clear picture emerges of the value of, and need for, a formal and anonymous reporting channel in smaller organizations.

Large organizations: Because larger organizations receive less than half the *Reports per 100 Employees* of small organizations, they are more likely to be capturing and managing reports locally in addition to their formal anonymous reporting system. These organizations should consider ways to better capture reports from all sources to ensure they are able to identify trends and risk areas. Large organizations likely have more resources to investigate reported issues as they have the shortest median *Case Closure Time* of 19 days.

Mid-size organizations: Mid-mid/large size organizations (2,500-50,000 employees) seem to be the most challenged as reflected in the data. They receive the fewest reports, all under 1.0 *Reports per 100 Employees*. They have among the highest anonymous reporting levels and longest *Case Closure Times*. They track along the median for *Substantiation Rates*. Resource constraints may be most at play in these organizations both in communications and messaging as well as in case investigation.



Key actions to consider

There are many more findings and data points contained in the report that are not addressed in this summary, and we hope they will add additional insights for your specific program. These findings highlight several actions for compliance professionals to consider, including:

- 1 Reassess the health and messaging of your organization's speak-up culture.** With the uncertainty of the current economic environment, reporters may be less confident to speak up. Consider if a change in messaging and more training on retaliation are needed to address the dynamics of a workplace that may have changed significantly in recent years.
- 2 Continue to monitor, and act on, workplace civility issues.** As in last year's report, these concerns are critically important to the health of a workplace culture and appear to be growing in prominence for reporting parties. Consider these in the context of organizational pressures to perform.

- 3 Support and track reports from the variety of intake channels available to meet the needs of your current workforce.** All reporting channels have value, and it is interesting to see the telephony channel on the rise. The complex working environments of today's economy suggest it is critical to provide channels that meet reporters where they are, be that in-person, remote or some mix.
- 4 Recognize that anonymous reports are more valuable than many have recognized, particularly in small organizations.** At the same time, encourage web reporting that allows a reporter to take the time to consider and provide more detailed accounts to improve substantiation rates of anonymous reports.





52 MILLION
Employees

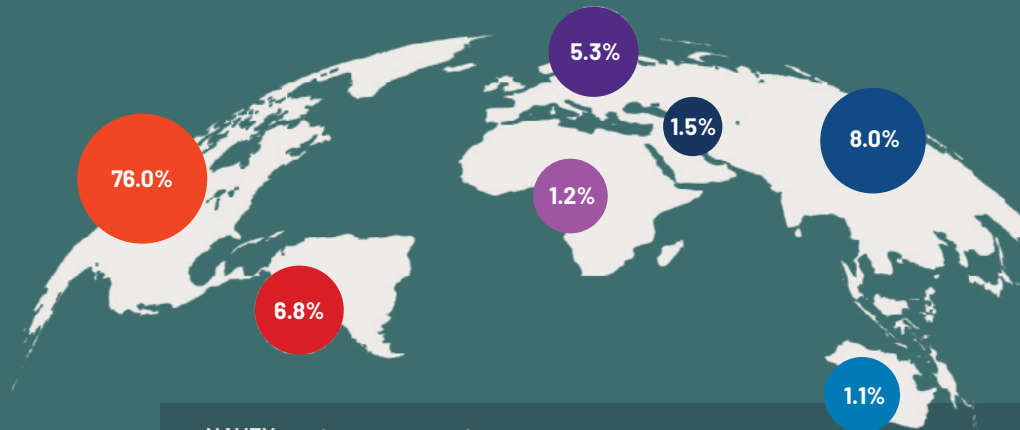


1.52 MILLION
Reports

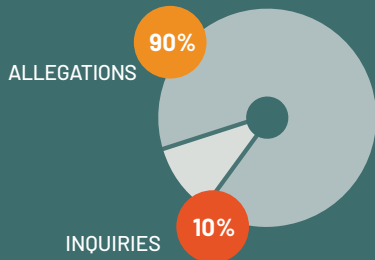


3,430
Organizations

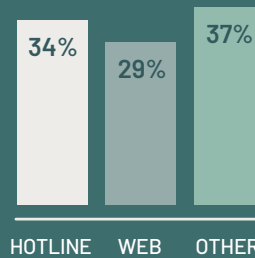
A SNAPSHOT OF OUR DATABASE



NAVEX customers generate the world's largest database of reports



Reports are any unique contact, including both questions and claims



NAVEX's data collection captures all intake methods

TOP 6 INDUSTRIES



Retail Trade



Healthcare and Social Assistance



Finance and Insurance



Transportation and Warehousing



Transportation Equipment Manufacturing



Food Services and Drinking Places



Report distribution by employee count (2022)



2023

Key Findings



1 Report Volume

Report Volume – Reports per 100 Employees

Report Volume rebounded, reaching highest levels ever

The *Report Volume per 100 Employees* benchmarking metric allows organizations of all sizes to compare total unique contacts across all reporting channels (web, hotline, open door, email and more). It is key for organizations to have accurate employee counts when assessing this metric. Additionally, any large changes in staffing levels over the course of a period should be considered.

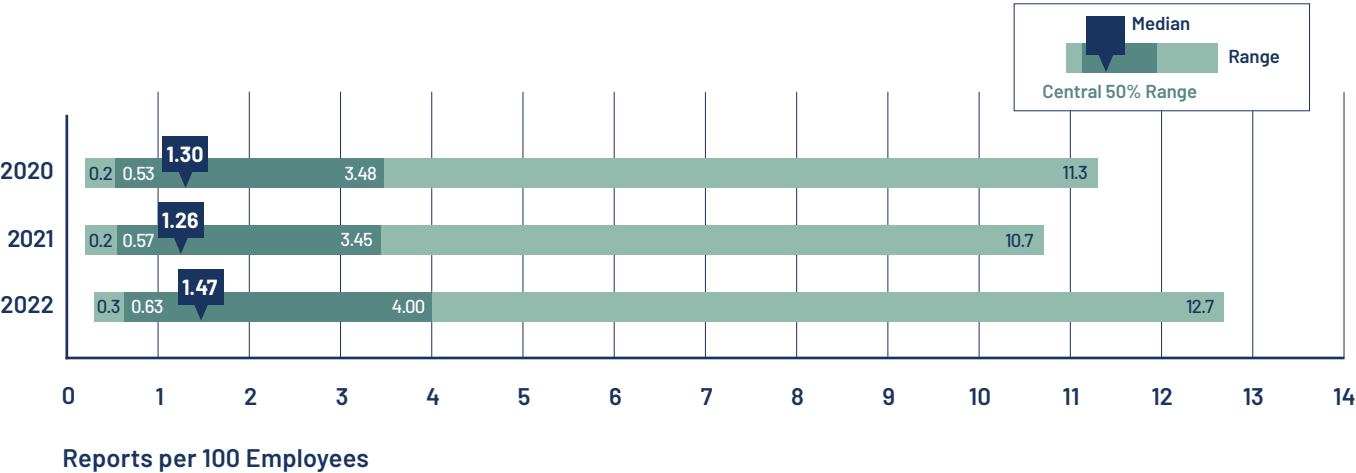
How to calculate: Find the number that reflects all the reports gathered by all reporting channels, divide that number by the number of employees in the organization and then multiply it by 100. For this metric to accurately compare to the calculation we've provided, organizations should not exclude any reports, regardless of intake method, issue type, substantiation or category.

NAVEX methodology update

- NAVEX refined its analysis to include an additional decimal place to better differentiate year-over-year reporting.
- Central 50% range of the distributions were included as an additional refinement to this metric within the overall range graph to better reflect the concentration of report volumes. The smaller bars collocated within the graphs show the range of *Report Volume per 100 Employees* represented by the central 50%. The full bar represents the central 80% of all organizations.

Report Volume – Reports per 100 Employees Median Report Value (MRV)

Median Reporting Value (MRV) and Ranges



FINDINGS: With the inclusion of the additional decimal place in the *Report Volume per 100 Employees*, we note that 2021 actually reflected a further decline from 2020 in reporting during the pandemic, which makes the increase in report volume in 2022 even more notable.

The increased median report volume of 1.47 per 100 employees in 2022 reflects a rebound from a pandemic-related dip, and even exceeds levels that had stabilized in the years prior to COVID-19. Historically, median *Report Volume per 100 Employees* has been a slow-moving metric. Annual volumes crept upward in the 2010s, and in the years prior to the disruption of the pandemic, stabilized at 1.4 *Reports per 100 Employees* for several years.

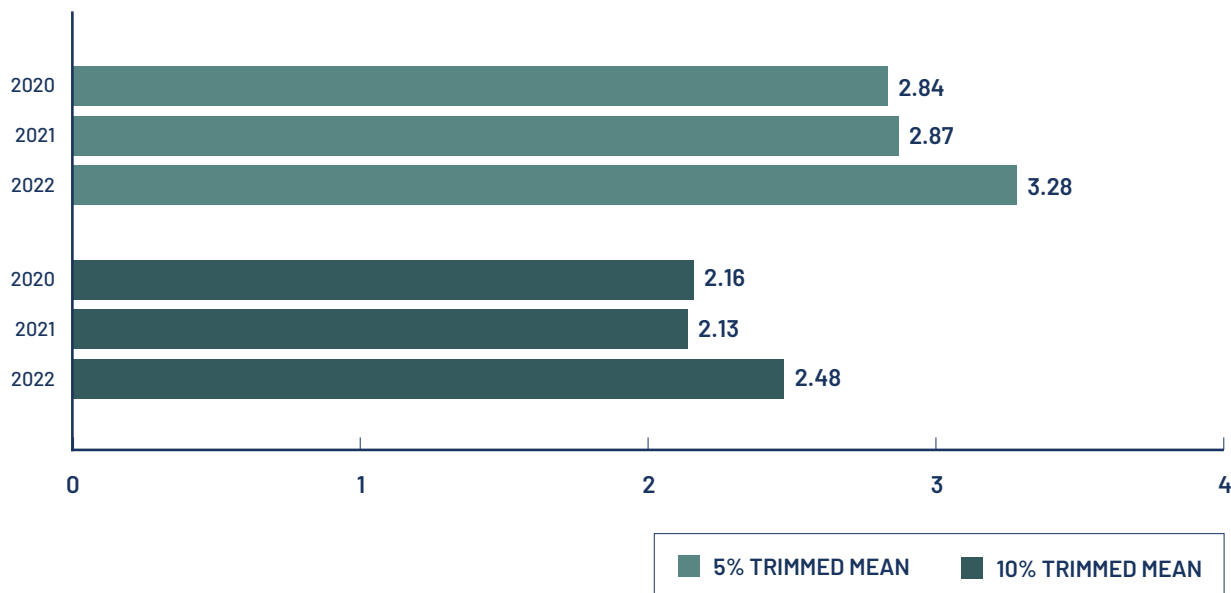
Regarding ranges, as noted in the updated methodology, we have now provided the central 50% of the ranges to better reflect the concentration of

report volumes. The full range bar represents the central 80%. The high end of the central 50% range is 4.0 *Reports per 100 Employees*, while the high end of the central 80% range reached the highest level in three years at 12.7 *Reports per 100 Employees*.

Report Volume – Reports per 100 Employees Mean Values

Some organizations have requested that we provide the mean for *Reports per 100 Employees*. As the chart below shows, the mean value is considerably higher than the median and can vary significantly based on the treatment/trimming of outliers. As we note in the appendix discussion on statistical calculations, the mean is most affected by a skewed distribution due to the impact of outliers. NAVEX recommends the use of the median values or frequencies in benchmarking.

Report Volume – Reports per 100 Employees Mean Values



Report Volume – Monthly Report Volume Comparison

Percentage of reports by month varies significantly, but follows similar patterns

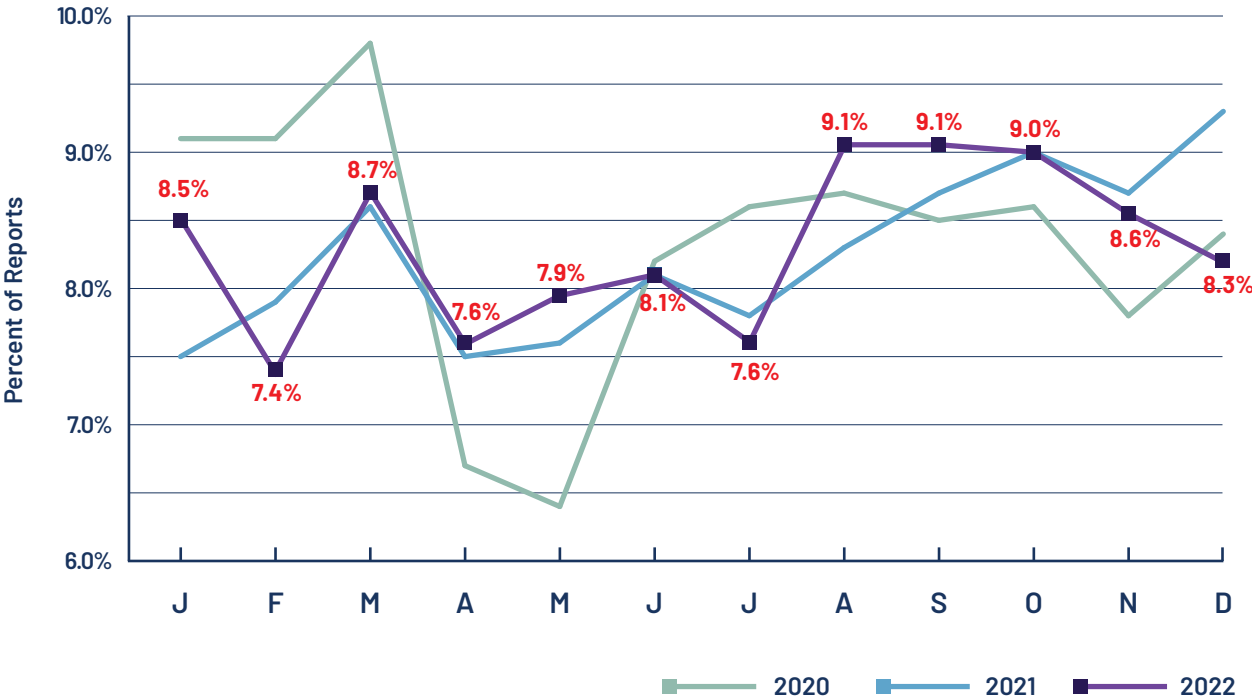
As shown in the chart below, report volumes plunged in the early part of 2020 as many parts of the world entered lockdown. They recovered to roughly match pre-pandemic volumes in the later months of the year, leading to an overall 2021 median of 1.26 Reports per 100 Employees.

Interestingly, the drop in volumes seen in the first part of 2020, while pronounced amid widespread COVID-19 lockdowns, appear to be part of a regular

pattern now that we have three years of data available by month. The first year NAVEX analyzed volume on a month-by-month basis was 2020, and the subsequent two years have shown a relative lull in activity from April to July. Unlike the first two years, however, 2022 was the first year to show a December decline rather than an increase.

Report Volume – Monthly Report Volume Comparison

Frequency Distribution

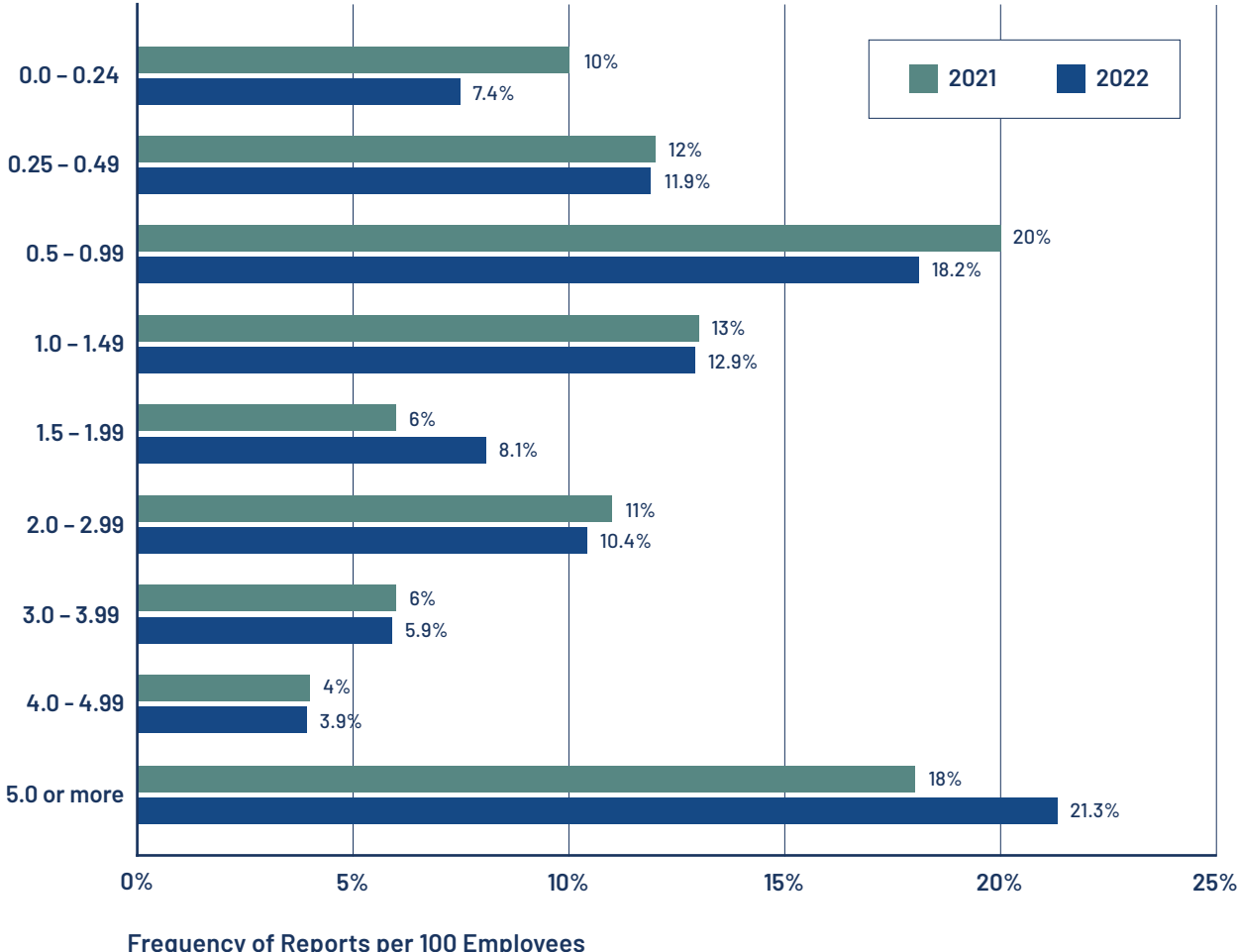


Report Volume - Frequency Distribution

21% of organizations received 5 or more Reports per 100 Employees

This chart shows the distribution of all organizations' Report Volume per 100 Employees across a group of ranges. For example, 11.9% of the organizations had a Report per 100 Employees measure between 0.25 and 0.49 in 2022.

Report Volume - Reports per 100 Frequency Distribution



The share of organizations in a given range of *Reports per 100 Employees* held generally steady year-over-year, with the largest changes seen at the lowest and highest ends of the distribution.

Organizations that received five or more *Reports per 100 Employees* represented a greater share of the distribution overall in 2022, increasing from 18% in 2021 to 21.3% in 2022. The share of those with the lowest level of *Reports per 100 Employees* decreased from 10% in 2021 to 7.4% in 2022.

These are positive trends, showing a greater share of organizations are at the best end of this spectrum (receiving more reports) while a smaller share are receiving few reports. Research shows organizations with high adoption of their internal hotlines see fewer external whistleblower reports to regulatory agencies and other authorities.³ Further, consistent usage of internal hotlines leads to fewer material lawsuits brought against the company, and lower settlement costs if a lawsuit does occur. Finally, organizations receiving more reports have greater profitability and workforce productivity as measured by return on assets.



³ Stubben, Stephen and Welch, Kyle, Evidence on the Use and Efficacy of Internal Whistleblowing Systems (February 29, 2020). Available at SSRN: <https://ssrn.com/abstract=3273589>

Report Volume – Intake Method

Organizations tracking reports from all sources record twice as many reports

The report *Intake Method* compares the level of reporting received by two groups of organizations. The first group only tracks reports received from their hotline and web reporting channels. The second group tracks reports gathered by other means (open-door conversations, email, mail, mobile and more) in their incident management system in addition to the reports received via their hotline and web reporting channels.

How to calculate: First determine which group best reflects your organization's approach. Then conduct the *Reports per 100 Employees* calculation as described previously.

NAVEX methodology update

- NAVEX refined its analysis to include an additional decimal place to better differentiate year-over-year reporting.
- Central 50% distributions were included as an additional refinement to this metric within the overall range graph to better reflect the concentration of report volumes. The smaller bars collocated within the graphs show the range of *Report Volume per 100 Employees* represented by that central 50% group. The full bar represents the central 80% of all organizations.
- In previous years, NAVEX has used both open and closed case sources to determine customer category. This year we have refined the methodology to only use open cases, which has resulted in some refinements to prior year reporting. This will be our methodology moving forward.



NOTE Regarding reports received via

mobile intake: while some organizations have requested a breakout of reports received via mobile intake, we found that the process of anonymizing the data removes identifiers that would or could be used to flag “mobile” reports. Therefore, “mobile” reports – reports made online through a mobile device – are counted with the “web” *Intake Method*.

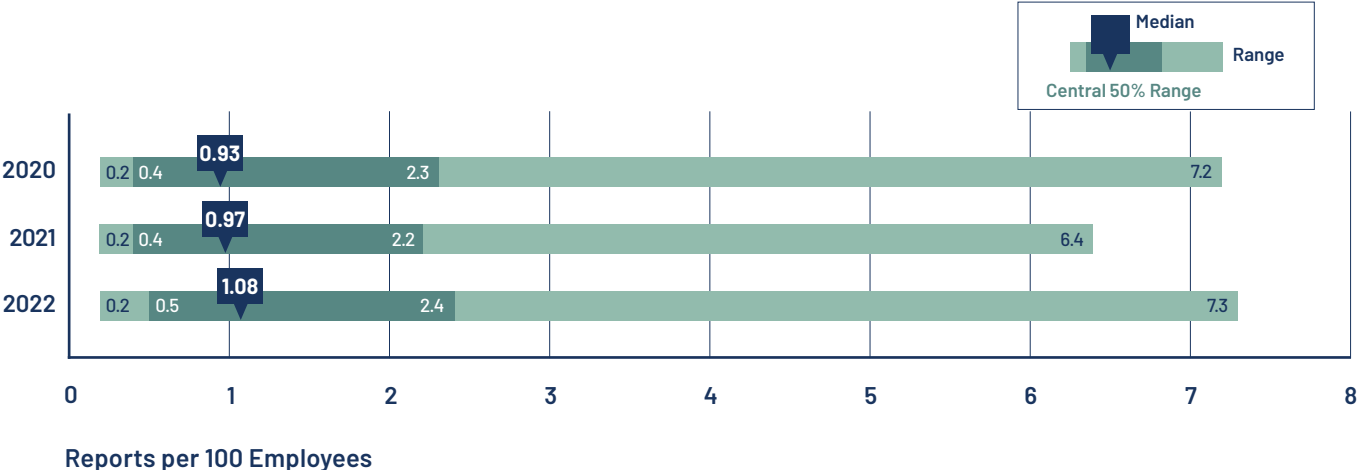
FINDINGS: Median *Intake Method* volumes rose for both organizations that only measure web and hotline intake, and organizations that measure other intake channels such as walk-ins.

Data by *Intake Method* reflects the observed overall increase in report volumes. For organizations only measuring web and hotline intake, volumes increased from 0.97 *Reports per 100 Employees* to 1.08 *Reports per 100 Employees*. For organizations measuring all sources, volumes increased from 1.74 reports to 2.08 *Reports per 100 Employees*.

As noted in the methodology updates, this is the first year NAVEX has included a central 50% distribution. Retroactive analysis shows the central 50% range holding relatively steady for those measuring only web and hotline in recent years, but the central 50% range grew in the direction of more reports for organizations measuring all sources.

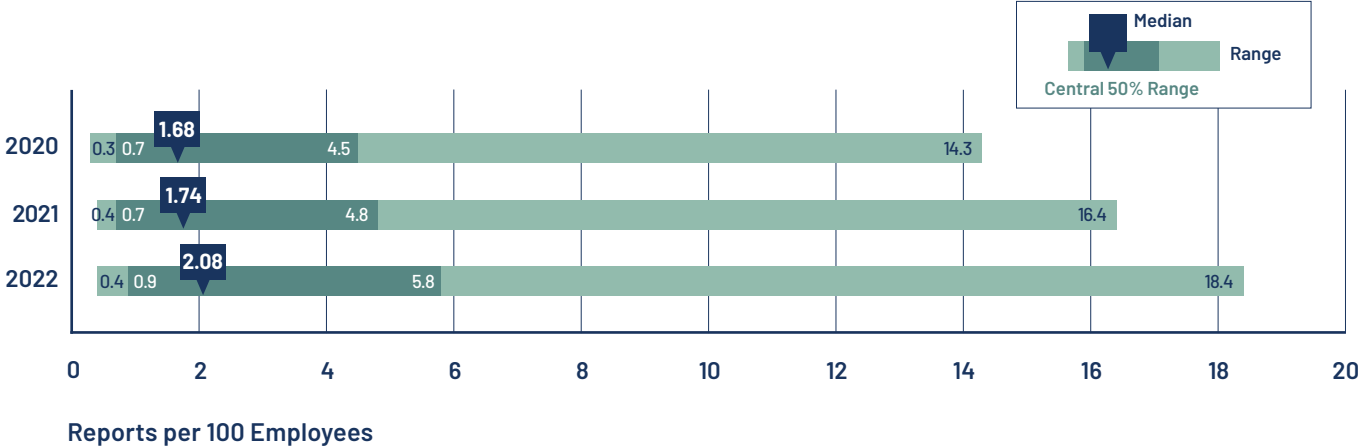
Report Volume – Intake Method: Organizations Tracking Web & Hotline Only

Median Reporting Value (MRV) and Range, Refined



Report Volume – Intake Method: Organizations Tracking All Sources

Median Reporting Value (MRV) and Range, Refined



Report Volume – Reports per 100 Employees by Employee Count

Smaller organizations receive the most Reports per 100 Employees

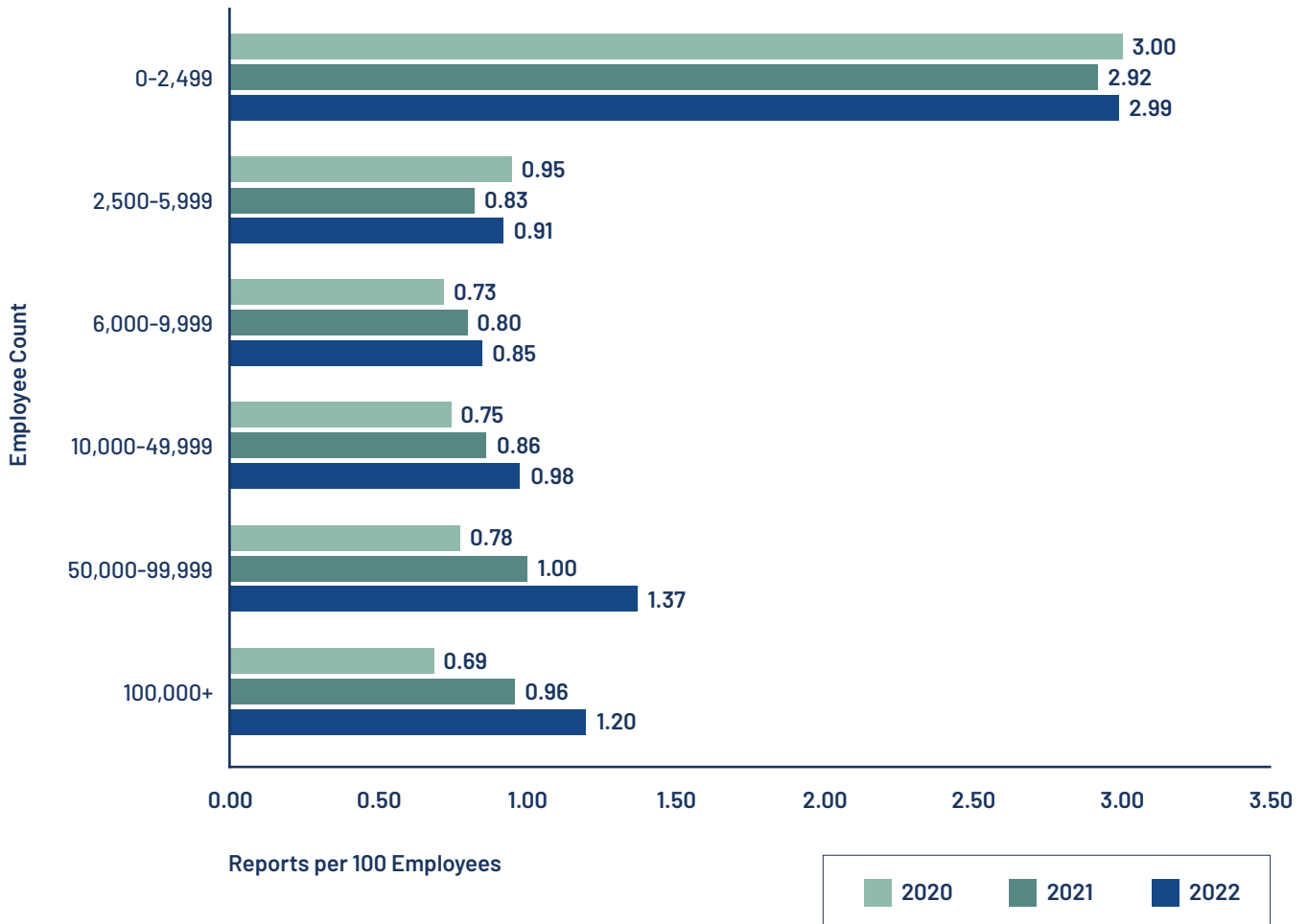
NAVEX methodology update

- *Report Volume per 100 Employees* calculated by organizational employee count has been refined to reflect additional ranges of employee counts.

FINDINGS: When looking at reporting by employee count, the median *Reports per 100 Employees* rose across all cohorts, most substantially for the 50,000-99,999-employee-count group. The cohort of 100,000 or more employees also saw a substantial increase.

Report Volume – Reports per 100 Employees by Employee Count

Median Reporting Value (MRV)



2 Report Intake Method

Hotline (phone use) rises, other methods decline

It is important to offer a variety of intake channels to employees and to track all reports received in a single, centralized database. This includes hotline, web intake and all other intake sources such as open-door conversations, letters to leadership, emails and walk-ins to the compliance office.

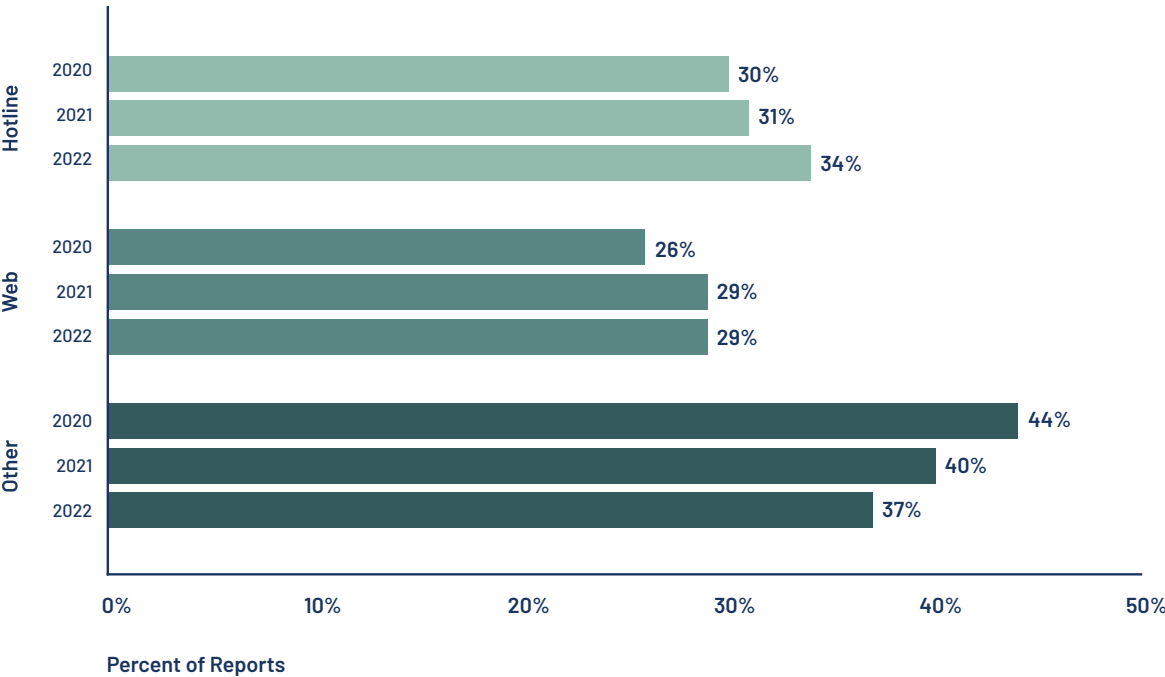
Monitoring the methods employees choose for reporting can help determine which are preferred or easy to access, and which methods employees may not know are available to them. Employee choice will vary depending on the makeup of the workforce and their access to phones, computers or onsite human resources.

How to Calculate: Group all non-hotline and non-web intake reports such as open-door, email, postal mail, fax and manager submissions together as Other. Then total up the number of reports received by each channel, hotline, web intake and other methods, and divide each by the total number of reports.

FINDINGS: Two charts are provided for this metric. The first compares intake by frequency, the second compares intake by median.

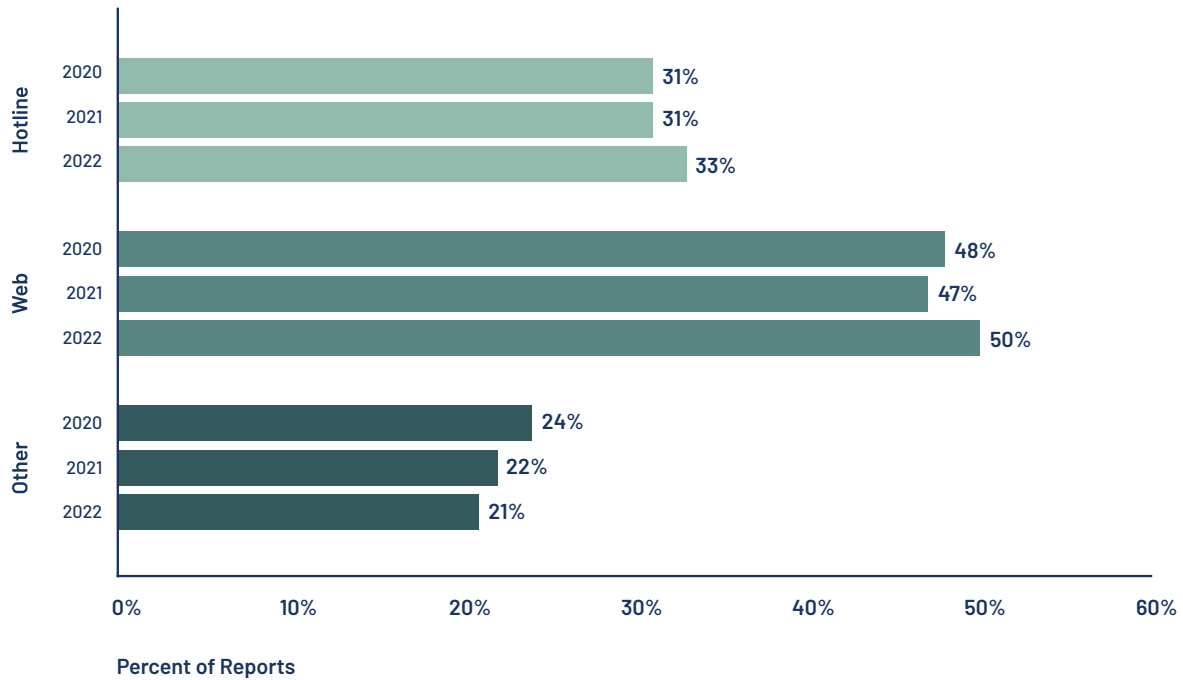
Report Intake Method – Frequency Comparison

Frequency Distribution



Report Intake Method – Median Comparison

Median Reporting Value (MRV)



Phone intake not only remains a critical channel for all incident management programs – the share of reports taken by phone has grown. It is possible the stabilization of a work-from-home arrangement for some job roles creates an environment that enables phone intake for certain workers.

Relatedly, other, which includes channels such as walk-in reports, has declined. This could also be attributable to the stabilization of some remote work.

A metric to watch is the uptick in web intake in median in 2022, indicating a typical organization sees half of its reports come in over the web.



Report Benchmark Categories & Issue Types

Environment, Health and Safety (EHS)-related reports continue to recede from COVID-19 highs, and Human Resources (HR) reports are back on the rise

Receiving reports in a variety of categories can be an indication of program effectiveness. Tracking the reports collected for each of the *Benchmark Categories* or *Issue Types* can reveal program gaps and successes. Receiving below-typical volumes could speak to a need for more training or awareness, while receiving above-typical volumes could indicate an area where there is risk to be addressed.

We organize our database into five primary categories, as well as an Other category, by grouping together like *Issue Types*. These are the six *Benchmark Categories*. This allows us to compare all the reports collected, even when individual organizations are utilizing unique *Issue Types* or naming conventions. We further break down the *Benchmark Categories* into 24 *Issue Types*. Last year we published a first look at data for 24 *Issue Types*.

At NAVEX, we believe the standardization of *Issue Types* across the ethics and compliance industry is necessary for effective benchmarking. It is more meaningful to understand, and report on, the true nature of issues impacting an organization when *Benchmark Categories* and *Issue Types* are more standardized.

The appendix to this report provides a list of the *Benchmark Categories* as well as the 24 *Issue Types*. It also includes the definitions we use for each of the 24 *Issue Types*. We hope all organizations will consider adopting a standardized taxonomy going forward to aid consistency in benchmark data.

The *Benchmark Categories* are defined below:

- **Accounting, Auditing & Financial Reporting** are reports that pertain to these functions in an organization (e.g., financial misconduct, internal controls, audit).
- **Business Integrity** are reports that show how an organization interacts with third parties, data, legislation, patients or customers. *Issue Types* include conflicts of interest, vendor/customer issues, fraud/waste/abuse, HIPAA, data protection, global trade, human rights, free and fair competition, product quality/safety, and insider trading.
- **Human Resources (HR), Diversity & Workplace Respect** are reports that involve internal parties and often relate to employee relations or misconduct. *Issue Types* include discrimination, harassment, workplace civility, retaliation, compensation and benefits, substance abuse, and general or other HR.
- **Environment, Health & Safety (EHS)** are reports that involve an element of safety typically pertaining to employees, environmental regulations or workplace health (e.g., EPA compliance, assault or threat of an assault, workplace safety, OSHA).
- **Misuse or Misappropriation of Assets** are reports that specify company assets or time is being wasted or used in a manner other than what is expected (e.g., employee theft, inaccurate expense reporting, time clock abuse).

- **Other** is a category for hard-to-classify reports, that might range from complaints about too few snacks in the breakroom to feral cats prowling the corporate parking lot (those are actual reports organizations have received over the years).

Historically these Other reports were included with HR, Diversity and Workplace Respect issues, as these issues were typically addressed by Human Resources. Starting in 2021, we report these separately to be more precise in our analysis and keep the HR category as truly HR-related issues.

How to Calculate: First, ensure each report is sorted into one of the six *Benchmark Categories* or the 24 *Issue Types* as defined in the appendix. Then, divide the number of reports in each of the six categories by the total number of reports. Please note, when we are using the median for each category, the total won't necessarily add up to 100%.

NAVEX methodology update

- In calculations involving *Benchmark Category* or *Issue Type* frequency, we categorize the reports and find the frequency among all reports without grouping by organization. Frequency values should total 100%, or close to it, due to rounding.
- This year, NAVEX undertook an exhaustive audit of the categorization of each *Issue Type* which comprise the six *Benchmark Categories*. As a result of the extensive audit, findings related to reports of Harassment, Discrimination and Retaliation have been refined, including data reported in prior year reports.
- Based on a need to further refine the Human Resources-related reports, we eliminated the *Issue Type* called Industry-Specific Regulations used last year and created a new *Issue Type*, Workplace Civility. Industry-Specific Regulations is now part of the Other Business Integrity *Issue Type*. *Issue Types* are shown as part of their respective *Benchmark Categories* throughout this report.
- As part of the audit of the *Issue Type* mappings, flags for two healthcare-related terms were created as they comprise a significant portion of the Business Integrity Benchmark Category.

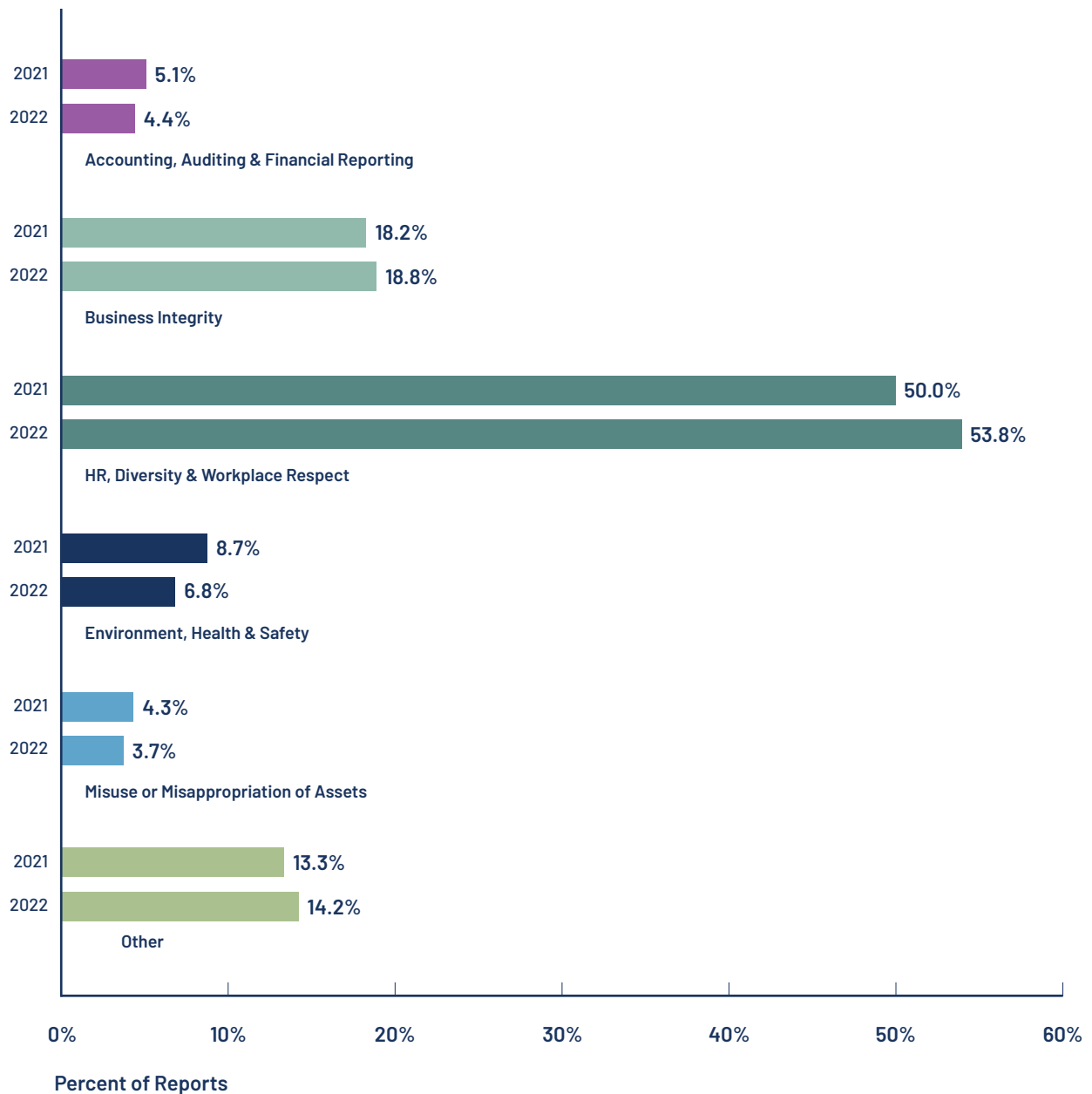
FINDINGS: Looking at the median value of reports per *Benchmark Category*, EHS reports comprised a smaller share of overall reports in 2022 compared to 2021. This is consistent with the previous NAVEX assessment that COVID-19-related workplace concerns were declining. However, safety concerns are still high as will be shown when reviewing the breakdown of the 24 *Issue Types*.



Meanwhile, HR, Diversity & Workplace Respect reports increased in 2022. This comes as workplace dynamics shift amid return-to-office or other long-term plans for organizations.

While the next chart references the median for each *Benchmark Category*, the following chart depicts the frequency of each *Benchmark Category*, which parallels trends observed across the medians.

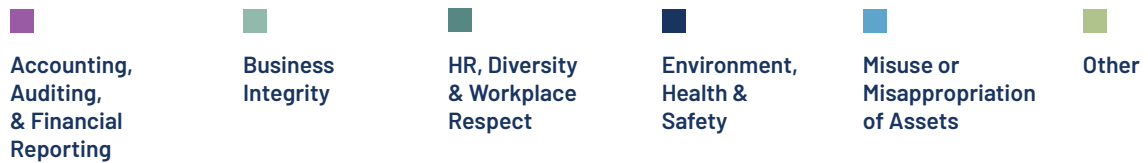
Report Benchmark Categories & Issue Types – Benchmark Categories by Category, Median
 Median Reporting Value (MRV)



Report Benchmark Categories & Issue Types – Reports by Benchmark Category, Frequency



Percent of All Reports



Report Benchmark Categories & Issue Types – Issue Types

Issue Types highlight ongoing health and safety concerns, and a red flag on workplace behaviors

A complete analysis of all 24 *Issue Types* is provided in the following tables. (As noted, the appendix includes an explanation of how each *Issue Type* is defined.)

This table shows the frequency for each *Issue Type*, indicating the volumes experienced by a typical organization.



Report Benchmark Categories & Issue Types – Reports by Issue Type, Frequency

Frequency Distribution

Benchmark Category	Issue Type	2021	2022
Accounting, Auditing & Financial Reporting			
	Accounting, Auditing and Financial Reporting	2.28%	2.12%
Business Integrity			
	Bribery and Corruption	0.54%	0.69%
	Confidential and Proprietary Information	0.56%	0.47%
	Conflicts of Interest	10.11%	7.87%
	Data Privacy and Protection	5.37%	4.90%
	Free and Fair Competition	0.11%	0.10%
	Global Trade	0.14%	0.13%
	Human Rights	0.08%	0.10%
	Insider Trading	0.03%	0.03%
	Other Business Integrity	12.75%	14.54%
	Political Activity	0.02%	0.02%
	Product Quality and Safety	0.47%	0.52%
HR, Diversity & Workplace Respect			
	Compensation and Benefits	2.28%	2.23%
	Discrimination	7.39%	7.91%
	Harassment	3.64%	4.39%
	Other Human Resources	26.57%	26.67%
	Retaliation	0.78%	0.96%
	Substance Abuse	0.56%	0.71%
	Workplace Civility	6.37%	6.88%
Environment, Health & Safety			
	Environment	0.13%	0.12%
	Health and Safety	10.76%	9.53%
	Imminent Threat to a Person or Property	0.78%	0.37%
Misuse or Misappropriation of Assets			
	Misuse or Misappropriation of Assets	3.82%	3.94%
Other			
	Other	4.46%	4.80%
Total		100%	100%

It is notable that the frequency of **Bribery and Corruption reports increased in 2022**, as did Product Quality and Safety.



Excluding *Issue Types* defined as Other, the five *Issue Types* representing the greatest frequency across all reports in 2022 were:

- Health and Safety: **9.53%**
- Discrimination: **7.91%**
- Conflicts of Interest: **7.87%**
- Workplace Civility: **6.88%**
- Data Privacy and Protection: **4.90%**

Although lower than the previous year, Health and Safety reports had the highest frequency. It is important to highlight here that this *Issue Type* includes concerns such as a threat of assault or violence (not including an imminent threat).

It is notable that the frequency of Bribery and Corruption reports increased in 2022, as did Product Quality and Safety. Conflicts of Interest reporting dropped significantly but is still in the top five. It is also interesting that Data Privacy and Protection made the top five – we expect this to increase as consumers and regulators heighten their focus on data privacy.

Workplace behavior red flag

Perhaps the most concerning for organizations, however, is the increase in the frequency of cases attributable to workplace behavior issues and organizational stresses. The data shows the frequency of Harassment, Discrimination, Retaliation, Workplace Civility and Substance Abuse reports in 2022 all increased. When also considering the highest-frequency issue was Health and Safety reports – and again, that this *Issue Type* includes concerns such as a threat of assault or violence – we have a red flag for organizations.

Separate from the data analytics, there is also a concerning increase in matters of workforce sentiment and mental health found in keyword searches of our databases. These include terms such as anxiety, depression, exhaustion, mental health, pressure, quiet quitting and bullying cases.

Internal reporting systems serve as an emotional lifeline in some cases. Noting that many compliance programs view human resource matters as “not compliance issues,” it may be time to raise the profile of these types of matters within the compliance program and partner closely with Human Resources teams who are already well-aware of the increase in mental health issues facing their organizations.

Healthcare flags

As part of the audit of the *Issue Type* mappings, flags for two healthcare-related terms were created because of the volume of these issues in our data:

- Patient Quality of Care
- Healthcare Fraud, Waste and Abuse

These are exclusively within the Business Integrity category and showed that of all Business Integrity cases opened in 2022, 11.8% were related to Patient Quality of Care and 4.6% to healthcare fraud, waste and abuse.

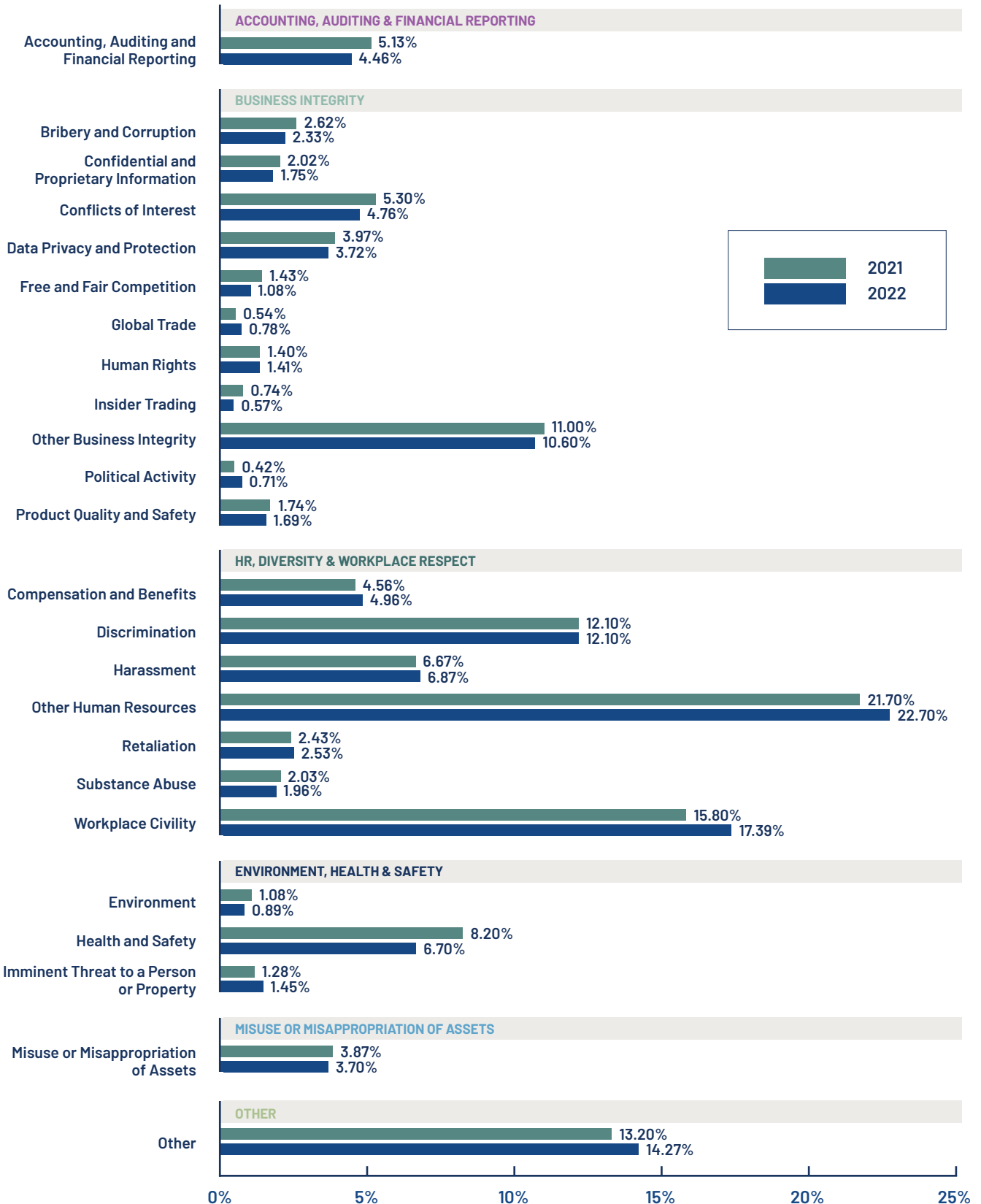
Issue Type medians

While the previous table represents frequency, the following chart presents the median of each of the 24 *Issue Types*. Some variation is evident when compared to frequency values but many of the trends are the same.



Report Benchmark Categories & Issue Types – Reports by Issue Type, Median

Median Reporting Value (MRV), Arranged by Issue Category



Benchmark Categories & Issue Types – Allegations vs. Inquiries

Inquiries remain at all-time low

This metric categorizes reports made by employees as either an allegation or an inquiry. Both types of reports provide valuable insight. Allegations are important points of concern or incidents employees have trusted their organization to investigate. Inquiries are questions, requests for guidance, etc. and are not any less important. Inquiries highlight key areas where more training may be needed, or policies that may need to be refreshed.

How to Calculate: Categorize each of your reports as either an inquiry or an allegation. To find your percent of inquiries, divide the number of inquiries by the total number of reports received in the period. Repeat this process for your allegations.

Ninety percent of reports were allegations in 2022, the same as the record high seen in 2021. Only 10% of reports were inquiries – well under half of the rates of inquiries seen a decade ago.

Benchmark Categories & Issue Types – Allegations vs. Inquiries

	2019	2020	2021	2022
Allegation	85%	86%	90%	90%
Inquiry	15%	14%	10%	10%

Seeing these rates endure for a second year could be an early signal of a “new normal.” Inquiries are healthy for any program, so the decline should not be taken lightly.

Some ways to interpret these findings could include:

- Employees are more confident when reporting an actual violation, having greater ability to “do their own research” via a mobile device or remote work environment.
- Organizations are not doing enough to encourage their reporting system as a channel for inquiries.
- Compliance programs are simply not capturing inquiries in their systems.

These points all deserve consideration. Organizations should be doing everything they can to ensure reporters feel comfortable making inquiries – this helps reporters to be properly informed on policy before alleging a violation and builds trust that an investigation will be taken seriously.

4 Anonymous vs. Named Reporting

Anonymous reporting rate rebounds, unfortunately

The *Anonymous vs. Named Reporting* benchmarking metric shows the percentage of all reports submitted by reporters who chose to not disclose their identity.

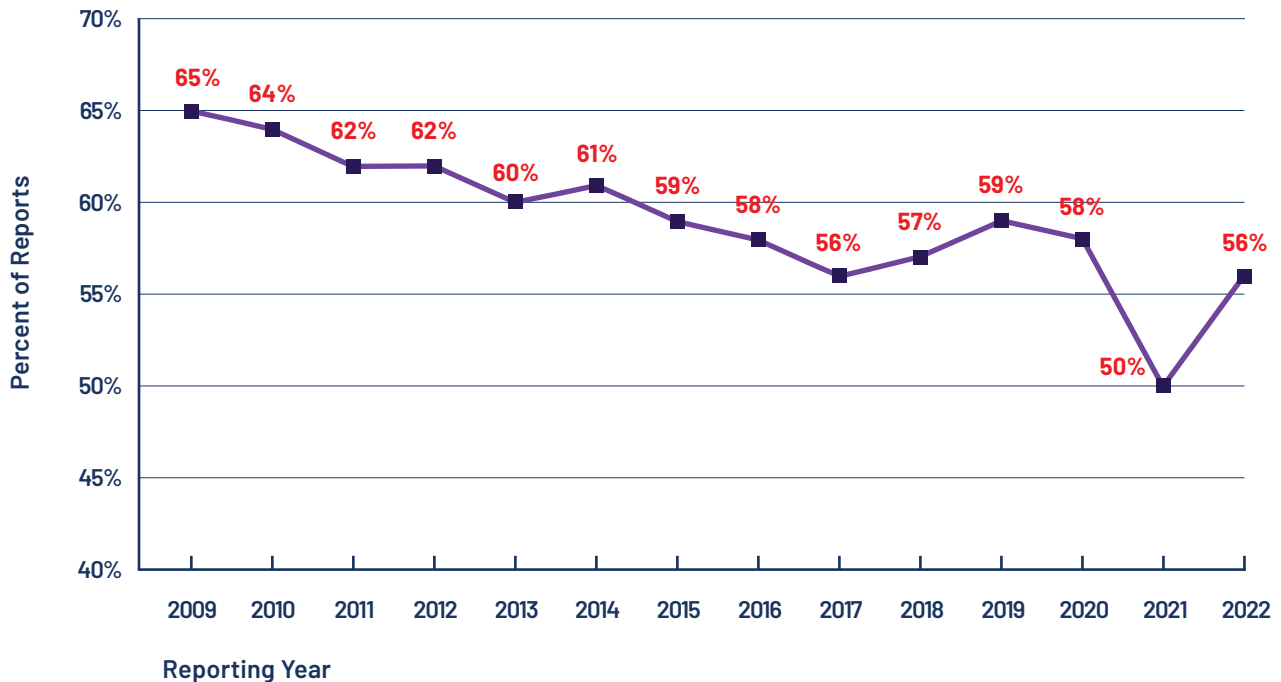
How to calculate: Divide the number of reports submitted by an anonymous reporter by the total number of anonymous and named reports received.

FINDINGS: In 2021, more reporters were putting their names behind their reports amid a strong job market and the so-called Great Resignation. That dip in anonymous reporting rebounded in 2022 to match more historic trends, with an MRV of 56% of reports being anonymous.

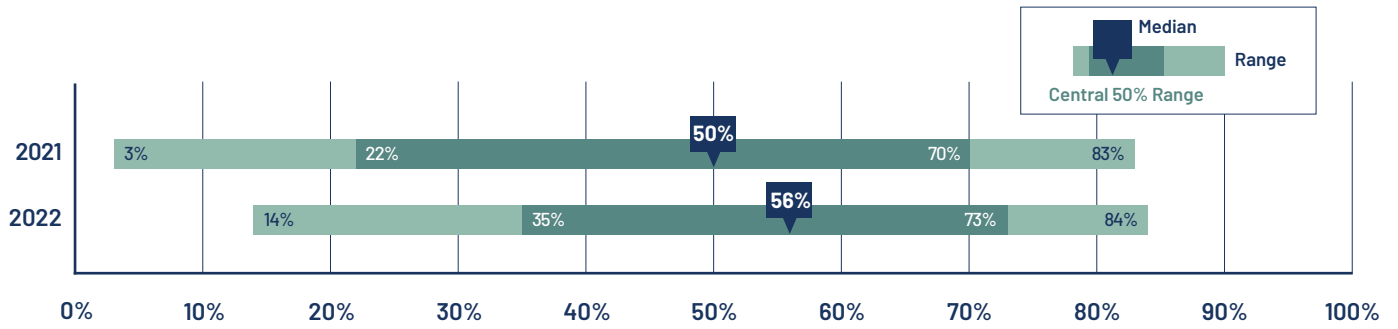
A typical organization still has seen its share of reports that are anonymous generally tick downward since 2009. This is an encouraging trend, as more named reports generally suggest a greater trust in using the system without fear of retaliation. However, this is a metric to watch, and as the *Anonymous vs. Named Reporting - Percentile Comparison* chart on the next page shows, the top of the central 50% range sits at 73% of reports coming in anonymously

Anonymous vs. Named Reporting – Anonymous Reporting Rate

Median Reporting Value (MRV)



Anonymous vs. Named Reporting - Anonymous Reporting Percentile Comparison



Anonymous vs. Named Reporting – Anonymous Reporting by Benchmark Category

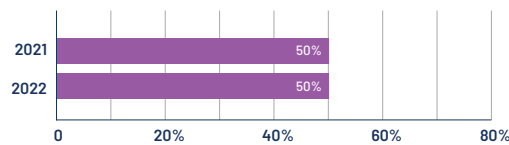
Environment, Health & Safety reports are most likely to be anonymous

The following chart shows the share of reports a typical organization sees as anonymous across the major *Benchmark Categories*. Environment, Health & Safety received the highest percentage of anonymous reports. Misuse or Misappropriation of Assets showed the biggest increase.

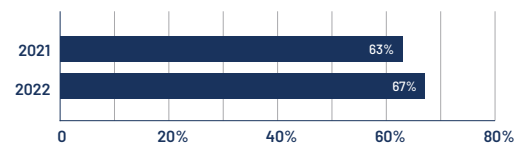
Anonymous vs. Named Reporting – Anonymous Reporting by Benchmark Category

Median Reporting Value (MRV)

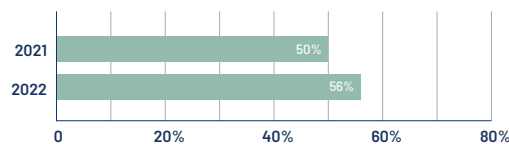
Accounting, Auditing & Financial Reporting



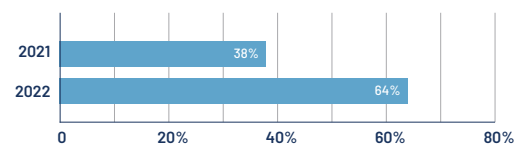
Environmental, Health & Safety



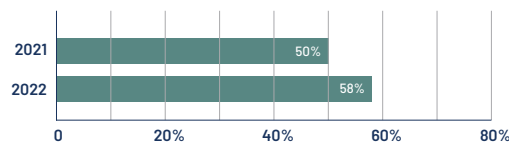
Business Integrity



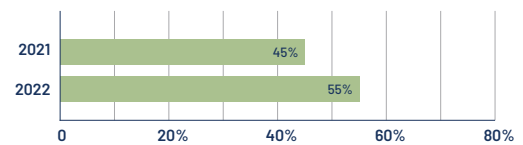
Misuse or Misappropriation of Assets



HR, Diversity & Workplace Respect



Other



Anonymous vs. Named Reporting - Anonymous Reporting by Issue Type

Workplace behavior-related issues comprise three of the top five Issue Types to be anonymous

The following table shows *Anonymous vs. Named Reporting by Issue Type*. **Note:** due to smaller report volumes for some *Issue Types*, we are using overall frequency by calculating the anonymity rate by *Issue Type* rather than using median values.

In 2022, excluding *Issue Types* defined as Other, the five *Issue Types* representing the greatest frequency of anonymous reporting across all reports in 2022 were:

- Workplace Civility: **44%**
- Human Rights: **42%**
- Substance Abuse: **42%**
- Free and Fair Competition: **41%**
- Harassment: **41%**

Notable here is the *Issue Type* that was almost never anonymous was Imminent Threat to a Person or Property at 4%.



Anonymous vs. Named Reporting – Anonymous Reporting by Issue Type

Frequency Distribution

Issue Category	Issue Type	2021	2022
Accounting, Auditing & Financial Reporting			
	Accounting, Auditing and Financial Reporting	32%	35%
Business Integrity			
	Bribery and Corruption	36%	24%
	Confidential and Proprietary Information	20%	24%
	Conflicts of Interest	14%	17%
	Data Privacy and Protection	8%	11%
	Free and Fair Competition	35%	41%
	Global Trade	13%	12%
	Human Rights	54%	42%
	Insider Trading	32%	31%
	Other Business Integrity	22%	25%
	Political Activity	30%	21%
	Product Quality and Safety	21%	22%
HR, Diversity & Workplace Respect			
	Compensation and Benefits	28%	34%
	Discrimination	36%	40%
	Harassment	40%	41%
	Other Human Resources	33%	35%
	Retaliation	31%	34%
	Substance Abuse	44%	42%
	Workplace Civility	46%	44%
Environment, Health & Safety			
	Environment	21%	23%
	Health and Safety	38%	34%
	Imminent Threat to a Person or Property	2%	4%
Misuse or Misappropriation of Assets			
	Misuse or Misappropriation of Assets	22%	25%
Other			
	Other	35%	41%

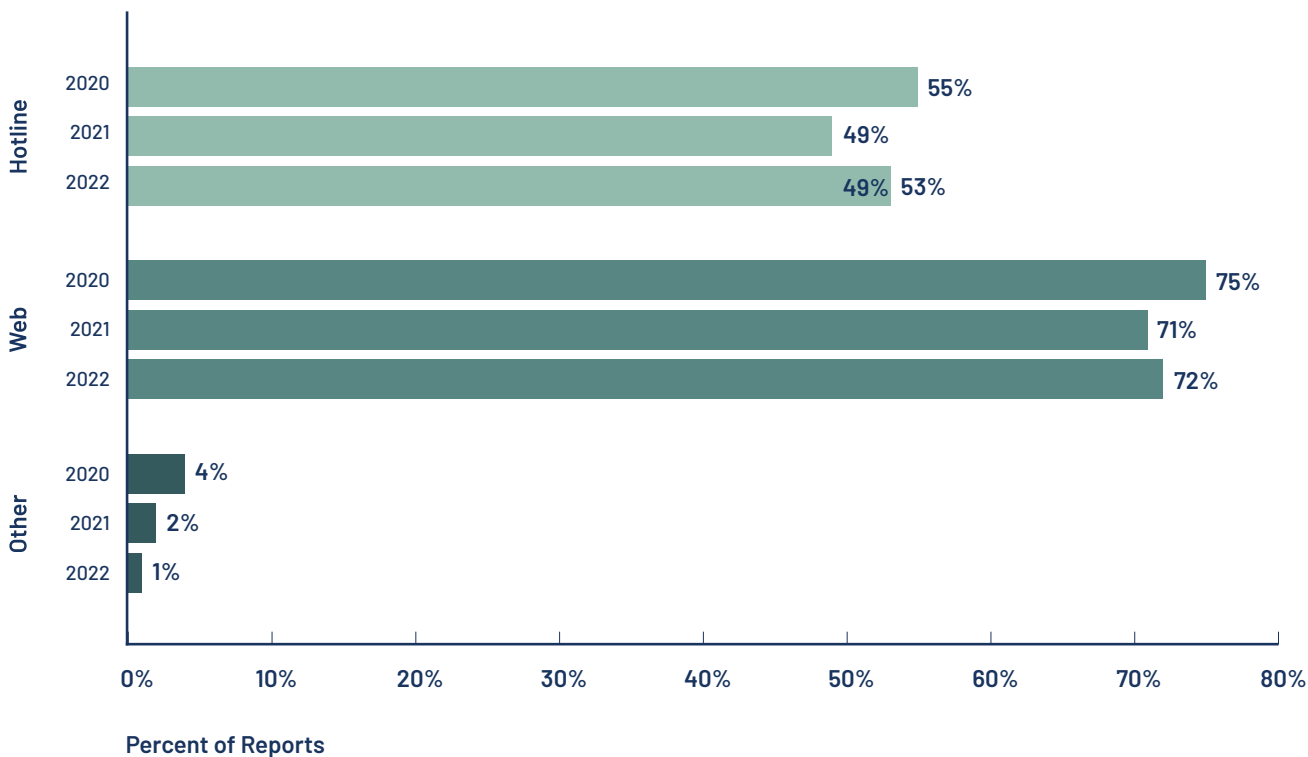
Anonymous vs. Named Reporting – Anonymous Reporting by Intake Method

Web reporting is far more likely to be anonymous than phone reporting

A typical organization saw 72% anonymity in their web intake in 2022, compared to 53% for their hotline. Other includes channels such as walk-in reports that are unsurprisingly minimal in this analysis.

Anonymous vs. Named Reporting – Anonymous Reporting by Intake Method

Median Reporting Value (MRV)



Anonymous vs. Named Reporting – Data by Employee Count, Anonymous Reporting Rate

Smaller organizations receive the most anonymous reports

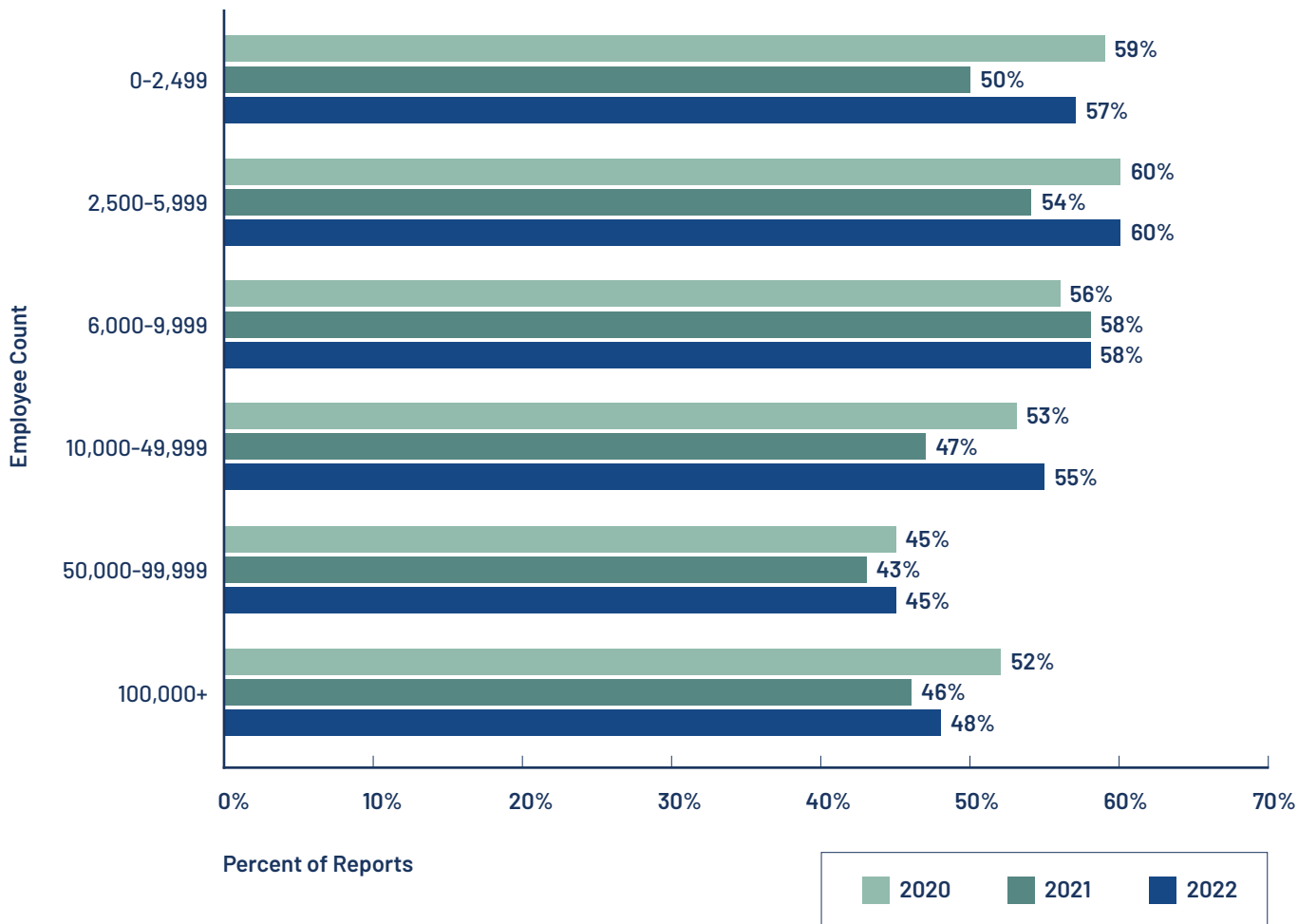
When looking at anonymous reporting by employee count in 2022, we find that smaller organizations tend to register higher levels of anonymity.

Organizations with fewer than 10,000 employees experienced 57% to 60% anonymity levels.

Organizations with more than 50,000 employees ranged from 45% to 48% anonymity.

Anonymous vs. Named Reporting – Data by Employee Count, Anonymous Reporting Rate

Median Reporting Value (MRV)



5 Follow-Up Rate to Anonymous Reports

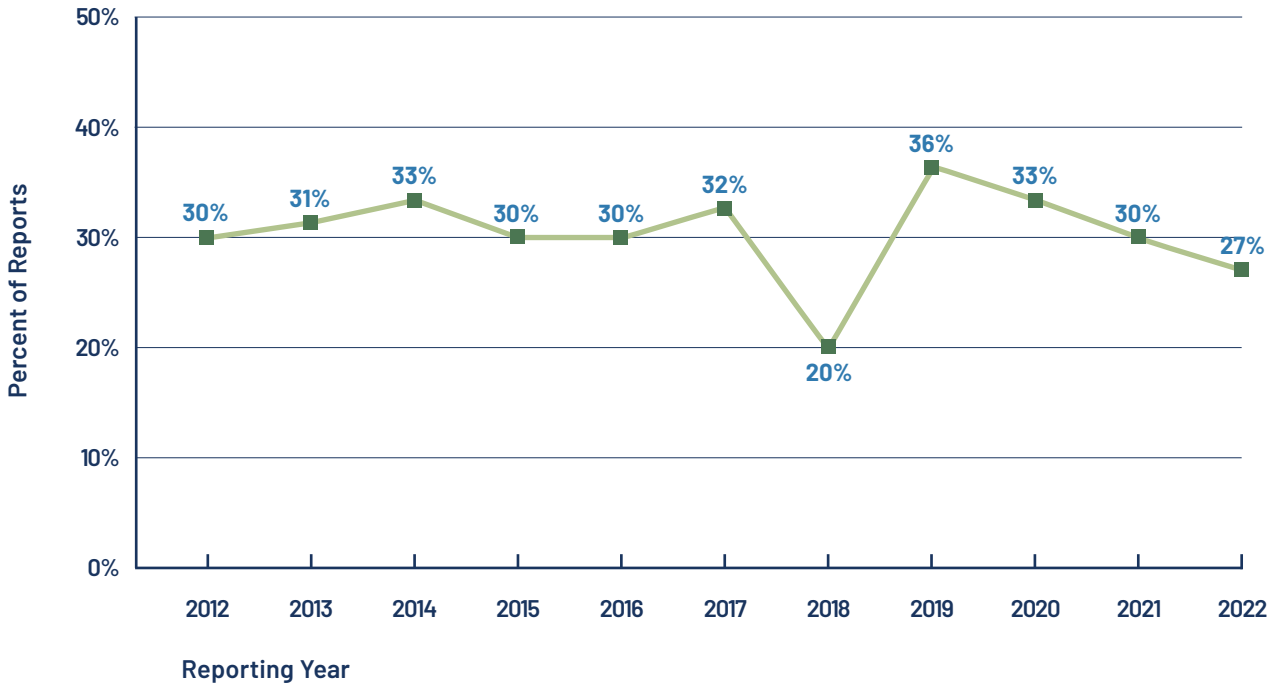
Trend passes troubling threshold

Training and communication about the organization's reporting system should always highlight the capabilities provided for anonymous reporters to follow up on their reports while maintaining their anonymity. The *Follow-Up Rate to Anonymous Reports* benchmarking metric indicates the percentage of reports that were submitted anonymously and subsequently followed-up on by the reporter.

How to calculate: Find the number of reports where the anonymous reporter returned to the system at least once. Divide this number by the total number of anonymous reports received. Please note, we do not count multiple follow-ups to the same report per metric. If an anonymous reporter returned to the system two times, that report would be included once.

Follow-Up Rate to Anonymous Reports

Median Reporting Value (MRV)

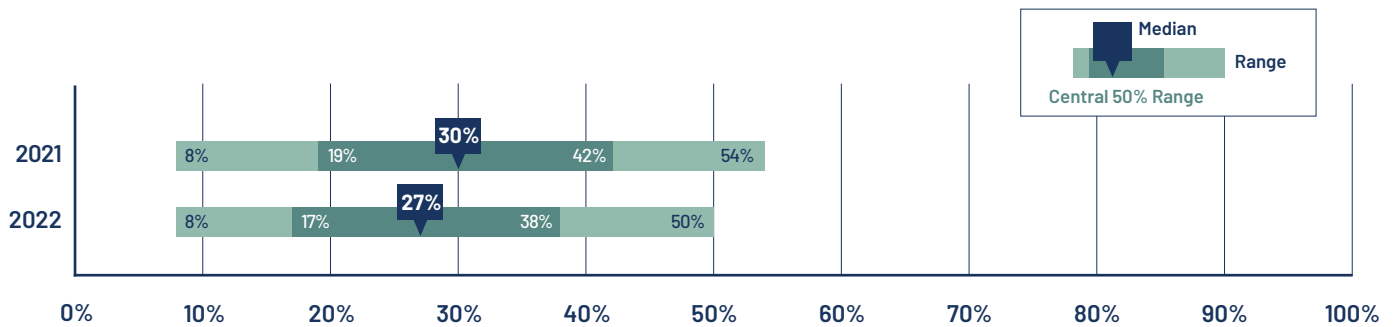


FINDINGS: Now at 27% for a typical organization, the *Follow-Up Rate to Anonymous Reports* has dropped below a 30% threshold. The highest this metric has ever achieved was 36% in 2019 and it has been dropping steadily since then.

As we said in last year’s report, organizations should continue to communicate the importance of anonymous report follow-up. Educating employees about the steps to effectively make and follow-up on a report is one significant way to affect this metric. NAVEX also hopes that the anonymous reporter email technology released in 2022, which allows follow-up via an anonymized email address, will improve anonymous follow-up rates.



Follow-Up Rate to Anonymous Reports – Percentile Comparison



Overall Substantiation Rate remains stable year-over-year regardless of the pandemic

The overall *Substantiation Rate* reflects the median rate of reports from both named and anonymous reporters that were closed as substantiated or partially substantiated. A high *Substantiation Rate* reflects a well-informed employee base making high-quality reports, coupled with effective investigation processes.

How to calculate: For overall *Substantiation Rate*: Divide the number of allegation reports that were closed as substantiated or partially substantiated by the total number of allegation reports that were closed as substantiated/partially substantiated or unsubstantiated as defined below.

- 1. Substantiated:** Reports that when investigated prove to be correct or partially correct as reported
- 2. Unsubstantiated:** Reports that when investigated prove to be inaccurate as reported or reports that cannot be proven to be true

Note: Due to smaller reporting levels for some *Issue Types*, we are using overall frequency to calculate the *Substantiation Rate* by *Issue Type* rather than using median values.

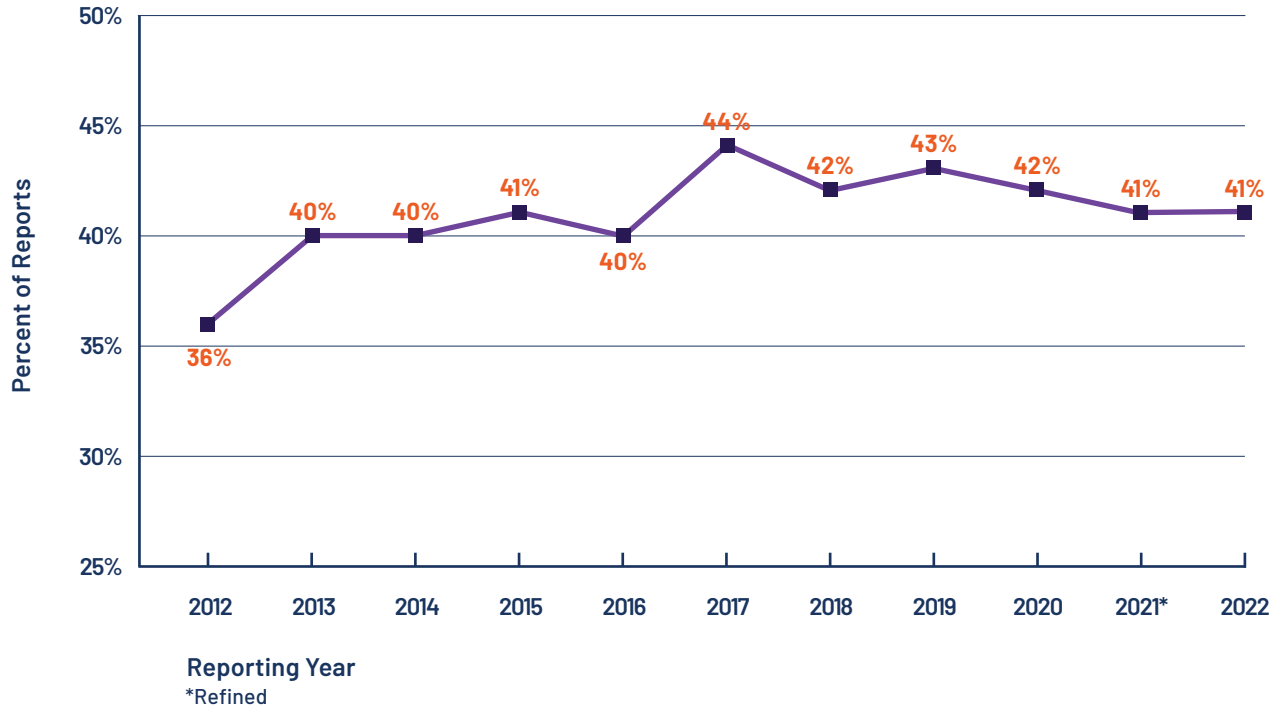
NAVEX methodology update

Organization overall *Substantiation Rates* of 0% and 100% are included in the distribution this year. This ensures that median calculations are more reflective of changes that may occur across the entire population previously considered to be outliers. **This change impacts some previously published metrics for prior years. The refinements to previous year calculations are noted throughout this section when updated.**

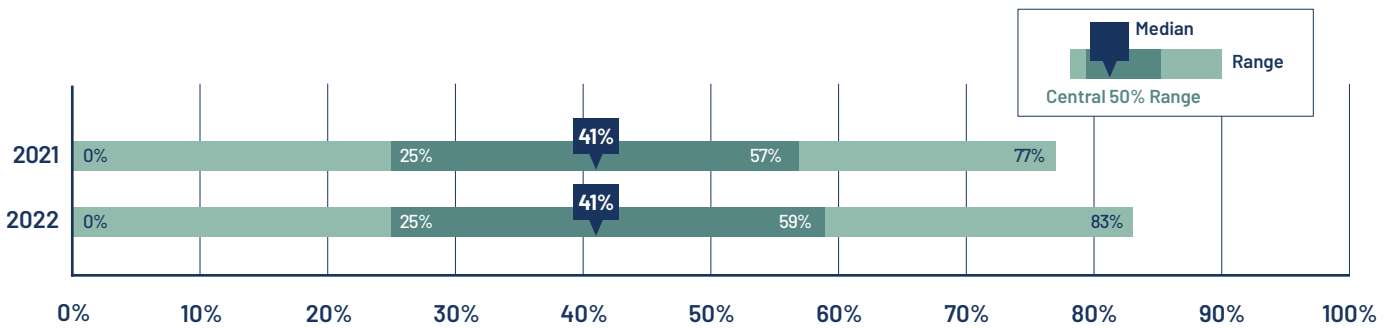
FINDINGS: The median overall *Substantiation Rate* continued a years-long trend of stability in 2022, matching the prior year's (refined) value of 41%. This makes for 10 years where the median *Substantiation Rate* has remained between 40% and 44% – a remarkable consistency given the historic disruptions such as a global pandemic seen during that period.

Substantiation Rate – Overall Substantiation Rate

Median Reporting Value (MRV), Refined



Substantiation Rate – Percentile Comparison



Substantiation Rate – Substantiation Rate of Allegations by Benchmark Category

Substantiation Rate of accounting-related issues declining over the last two years

The *Substantiation Rate* of EHS reports has ticked up incrementally since 2020, which could reflect a decrease in uncertainty for reporting parties around COVID-19-related issues. EHS and Misuse or Misappropriation of Assets were the two most frequently substantiated allegations, while HR, Diversity & Workplace Respect, being the least likely to be substantiated (excluding Other), is still substantiated close to 40% of the time.

Substantiation Rate – Substantiation Rate of Allegations by Benchmark Category

Median Reporting Value (MRV), Refined

	Accounting, Auditing & Financial Reporting	Business Integrity	HR, Diversity & Workplace Respect	Environmental, Health & Safety	Misuse or Misappropriation of Assets	Other
2020 (refined)	48%	44%	37%	42%	50%	–
2021 (refined)	44%	43%	38%	46%	50%	33%
2022	46%	43%	38%	50%	50%	33%

Substantiation Rate – Substantiation Rate by Issue Type

Global Trade and Imminent Threat issues have the highest frequency of substantiation

Issue Type analysis for substantiation is a rich area for different avenues of interpretation, and some areas stand out. The frequency of substantiation of Political Activity reports fell from 46% to 17%, which is interesting to note given 2022 was a mid-term election year. Workplace Civility, a newly defined *Issue Type*, held roughly steady at 45%. Substantiation for issues categorized as Environment rose from 57% to 71%.

In 2022, the five *Issue Types* representing the highest frequency of substantiation were:

- Global Trade: **76%**
- Imminent Threat to a Person or Property: **75%**
- Environment: **71%**
- Data Privacy and Protection: **68%**
- Misuse or Misappropriation of Assets: **67%**
- Health and Safety **65%**

At first glance, observing that Global Trade has the highest frequency of substantiation may be surprising, but given the focus on sanctions against Russia, it makes sense. Also note the frequency of Imminent Threat case substantiation of 75%; these cases are obviously top priority.



Substantiation Rate – Substantiation Rate by Issue Type

Frequency Distribution

Issue Category	Issue Type	2021	2022
Accounting, Auditing & Financial Reporting			
	Accounting, Auditing and Financial Reporting	53%	53%
Business Integrity			
	Bribery and Corruption	41%	40%
	Confidential and Proprietary Information	45%	57%
	Conflicts of Interest	39%	41%
	Data Privacy and Protection	70%	68%
	Free and Fair Competition	54%	40%
	Global Trade	93%	76%
	Human Rights	42%	43%
	Insider Trading	45%	61%
	Other Business Integrity	51%	53%
	Political Activity	46%	17%
	Product Quality and Safety	57%	46%
HR, Diversity & Workplace Respect			
	Compensation and Benefits	51%	49%
	Discrimination	31%	31%
	Harassment	43%	43%
	Other Human Resources	46%	44%
	Retaliation	15%	17%
	Substance Abuse	40%	49%
	Workplace Civility	43%	45%
Environment, Health & Safety			
	Environment	57%	71%
	Health and Safety	65%	65%
	Imminent Threat to a Person or Property	82%	75%
Misuse or Misappropriation of Assets			
	Misuse or Misappropriation of Assets	66%	67%
Other			
	Other	41%	44%

Substantiation Rate – Substantiation Rate of Anonymous vs. Named Reports

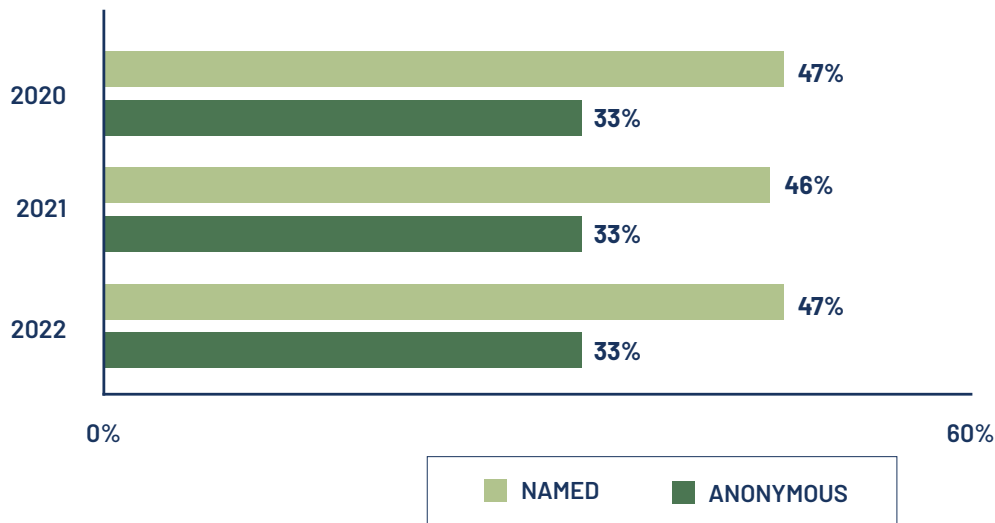
Named reports are always more likely to be substantiated, but one-third of anonymous reports are also founded

The comparison of *Substantiation Rates* between anonymous and named reports shows the percentage of all reports submitted by reporters who chose to remain anonymous versus the percentage of all reports submitted by reporters who did disclose their identity.

The rates of named and anonymous substantiation remained essentially flat for 2022 and the prior two years. Named reports have always been more likely to be substantiated. This is most likely attributed to the ability to follow-up directly with the reporter. This further highlights the need to train and encourage anonymous reporters to follow-up after filing their report.

Substantiation Rate – Substantiation Rate of Anonymous vs. Named Reports

Median Reporting Value (MRV), Refined



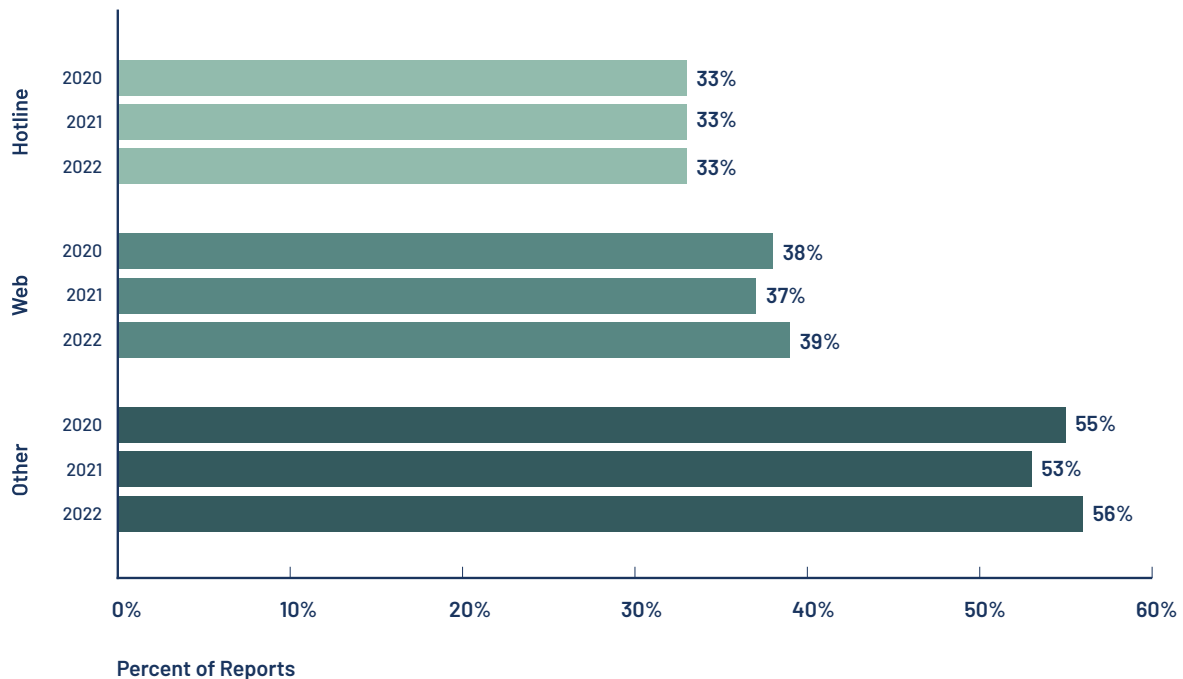
Substantiation Rate – Substantiation Rate by Intake Method

Reports received via Other intake method most likely to be substantiated

The intake channel where the greatest number of overall reports are found to be substantiated is Other, which primarily includes walk-in reports. This is notable given data elsewhere in this report that shows Other to be declining slightly in its share of report intake overall. Further, web reports have been consistently substantiated at a higher rate than phone reports.

Substantiation Rate – Substantiation Rate by Intake Method

Median Reporting Value (MRV), Refined



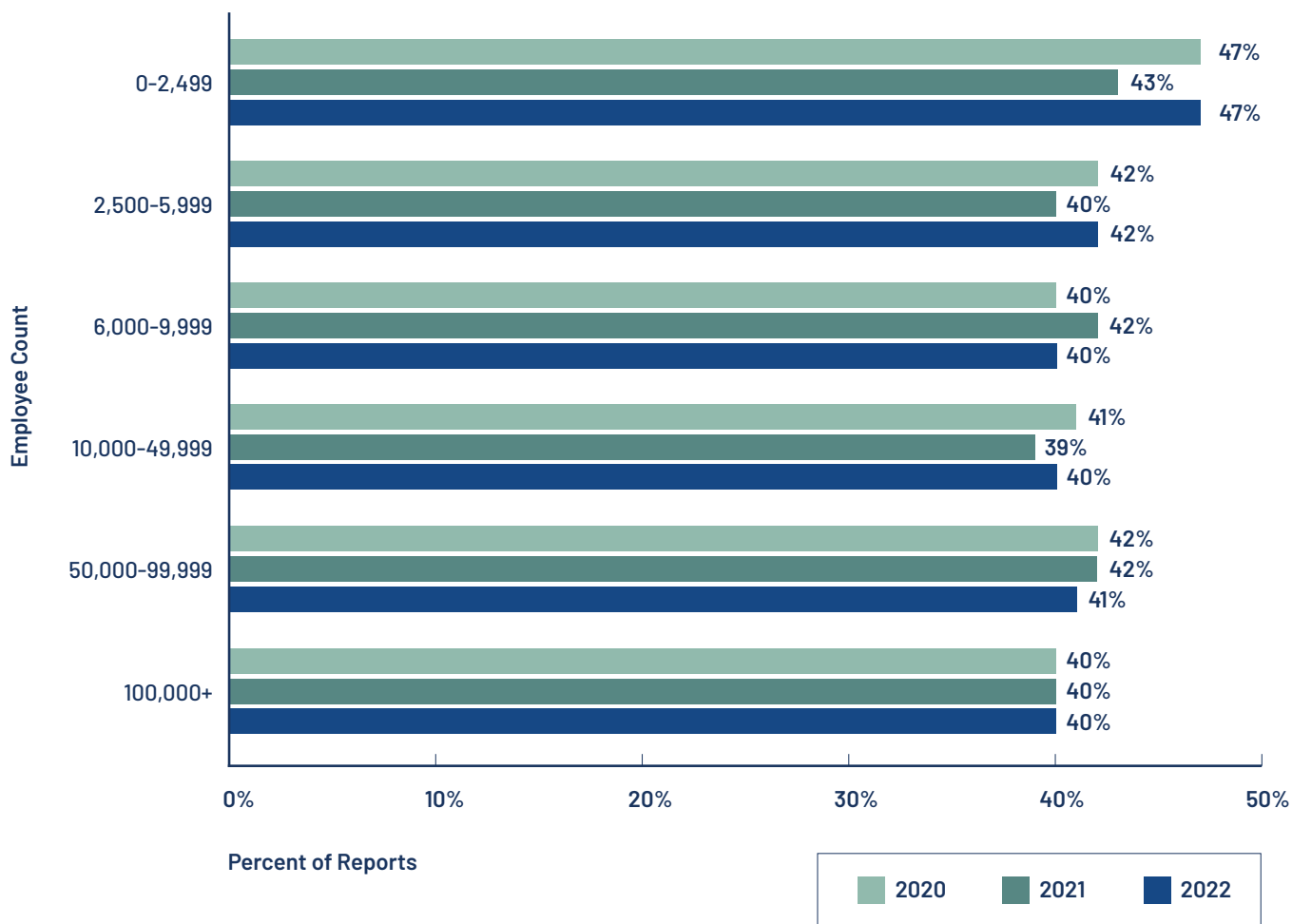
Substantiation Rate – Substantiation Rate by Employee Count

Smaller organizations have the highest Substantiation Rates

We have calculated the *Substantiation Rate* by employee count as shown in the chart below. At 47%, the median *Substantiation Rate* for the smallest organizational cohort in this distribution – 0-2,499 employees – remains the highest among the other groups. This group also saw a significant jump in median *Substantiation Rate* in 2022. Other cohorts were mostly consistent.

Substantiation Rate – Substantiation Rate by Employee Count

Median Reporting Value (MRV)



7 Case Closure Time

Outliers have big impact, median times hold steady

Case Closure Time metrics measure the number of calendar (not business) days it takes an organization to close a case. This benchmark is a key indicator of program effectiveness and impacts employees' perception of the process.

How to calculate: Calculate the number of days between the date a report is received and the date it is closed for each report. Then, calculate your mean *Case Closure Time* by dividing the total sum of all *Case Closure Times* by the total number of cases closed. For median values, find the middle point of the data - this is an important metric to explore, as it helps lessen the impact of outliers that can have a major impact on overall metrics.

NAVEX methodology update

Previously, *Case Closure Times* were based only on organization mean values. This year, the "median reporting value (MRV) of organization mean" values and "median reporting value (MRV) of organization median" values are calculated for additional data comparisons.

FINDINGS: For this year's report, NAVEX examined *Case Closure Time* through two methodologies:

- The "median of organization mean" values gives cases with longer closure times greater weight in the results.
- The "median of organization median" values diminishes the impact of those outliers.

Through these two lenses, it is clear that long-lasting cases have a major impact. Median *Case Closure Time*, using each organization's case closure mean value, is impacted by those longer cases, showing a median reporting value of a 44-day *Case Closure Time*.



Median *Case Closure Time*, using organization median values, shows a median reporting value of 24 days. Our previous reporting provided the median of the mean values. We have provided both here.

Both methodologies show roughly similar year-over-year trends by Benchmark Category, though closure times incorporating organization mean values are naturally higher. In each case, EHS reports are following a consistent march toward longer closure times. This could reflect a shift from a period when more of those reports were COVID-19-related and followed a consistent process in investigation.

Median Case Closure Times Using Organization Median Values

IN DAYS

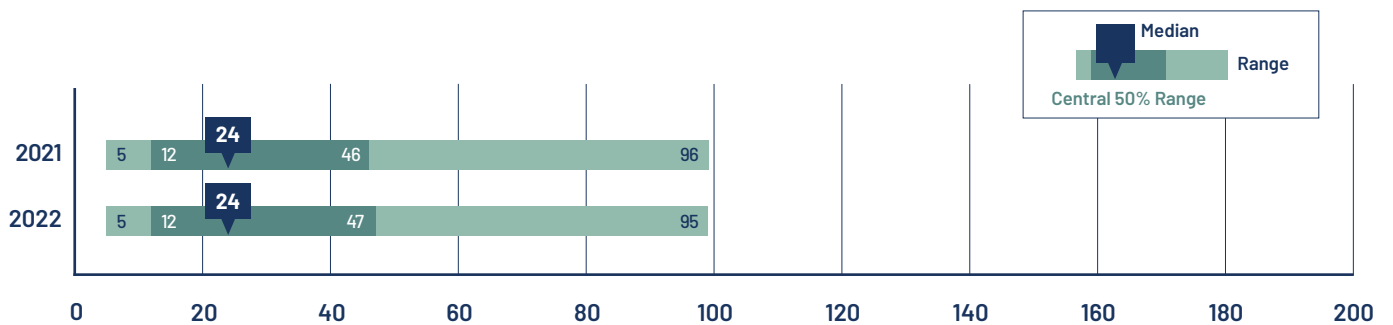
2020	2021	2022
23	24	24

Median Case Closure Times Using Organization Mean Values

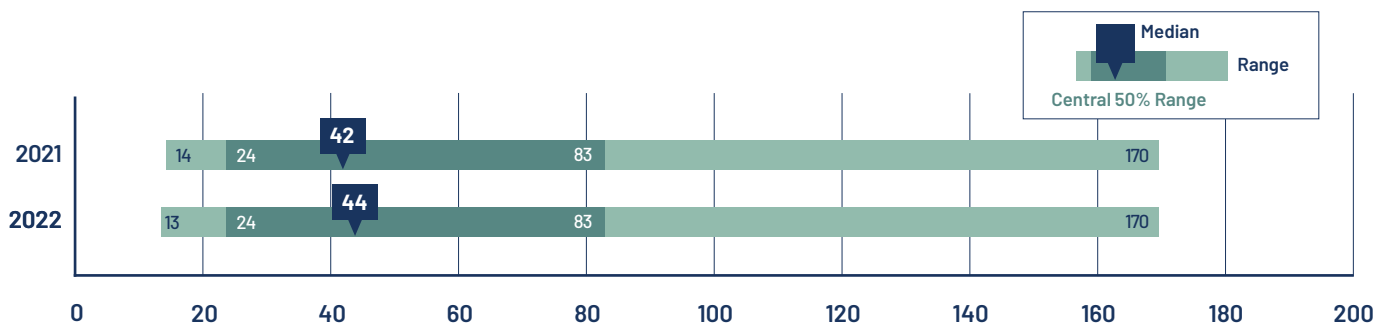
IN DAYS

2020	2021	2022
39	42	44

Case Closure Time - Organization Median Values Percentile Comparison

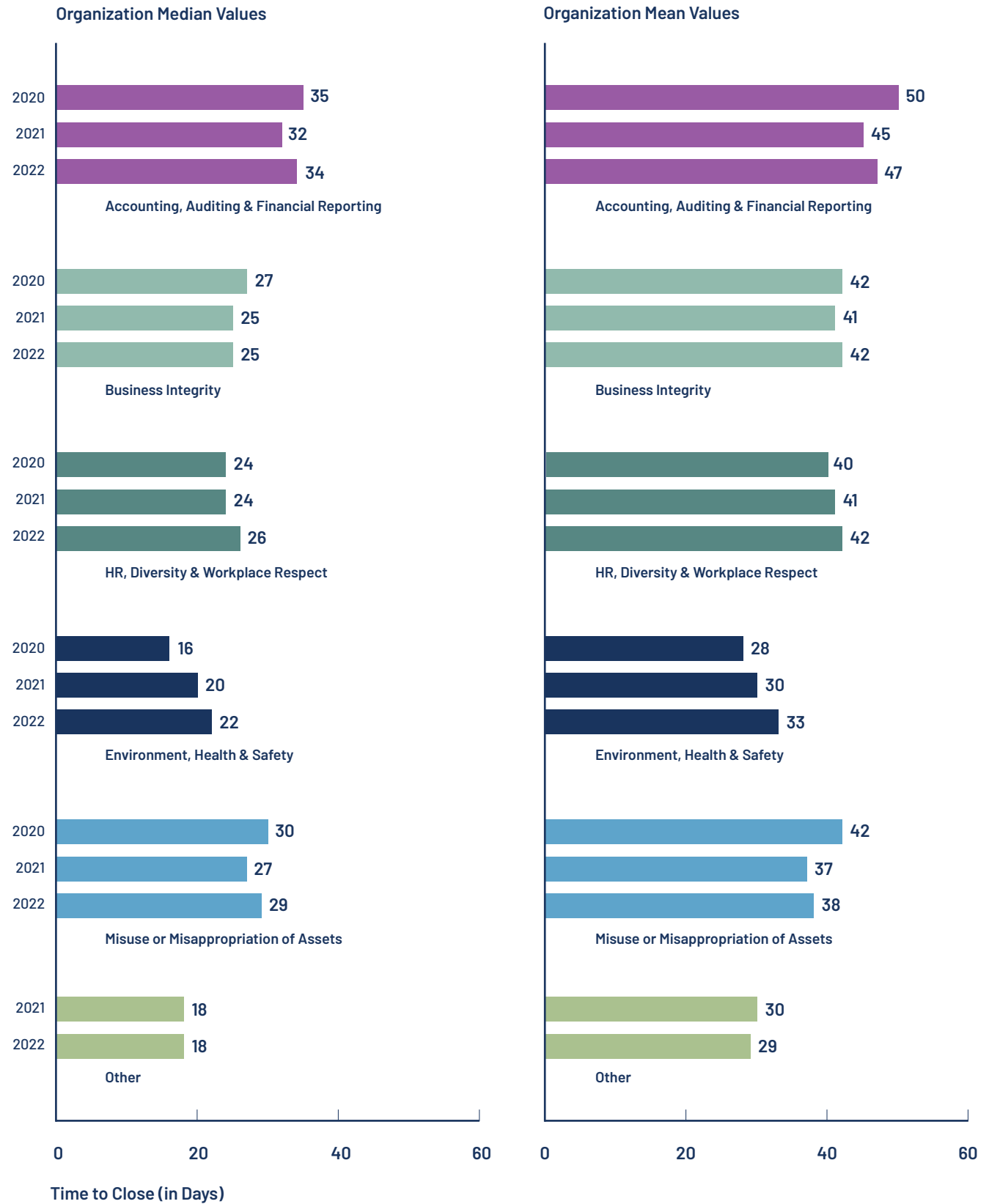


Case Closure Time - Organization Mean Values Percentile Comparison



Case Closure Time – Comparison in Days by Benchmark Category

Median Reporting Value (MRV)



Case Closure Time – Distribution of Cases Closed Same Day by Benchmark Category & Issue Type Category

Same-day closure data suggests a “closed” case for compliance may not be a “closed” case for the organization

Overall, 18% of all cases are recorded as “closed” on the same day they are received. Of those, EHS represents the greatest share at 21.4%.

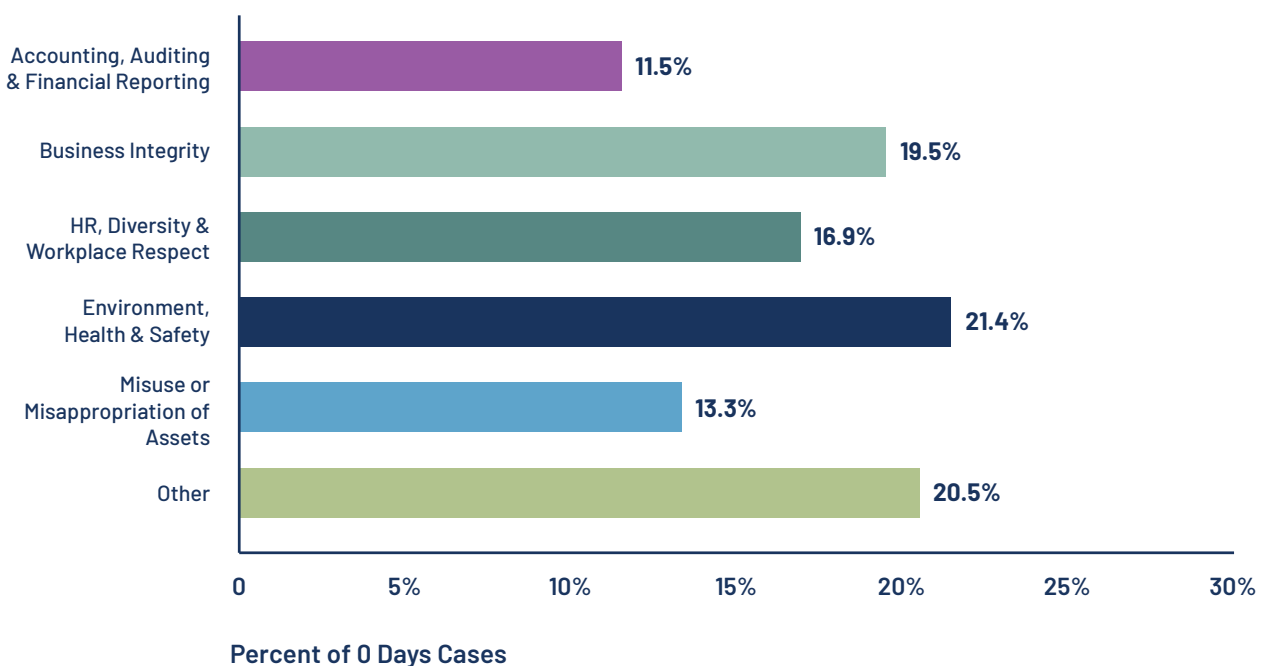
This metric, new to 2022, reflects cases that the Compliance team may have referred to another department and marked as “closed” before they are fully addressed. Some cases may indeed be closed on the same day, particularly those that are inquiries, yet

the weight in this distribution suggests an area where a “closed” case for Compliance may not be a “closed” case for the organization.

This metric highlights the importance of Compliance collaborating with other functions to ensure that all cases received are tracked to closure and that risk management data is being shared. It also presents some interesting contrasts – for example, Accounting comprises only 2.1% of all cases, but 11.5% of all same-day closures.

Case Closure Time – Distribution of Cases Closed Same Day by Benchmark Category

Frequency Distribution



Case Closure Time – Case Closure Time by Report Issue Type

Issue Category	Issue Type	MEDIAN (IN DAYS)		MEAN (IN DAYS)	
		2021	2022	2021	2022
Accounting, Auditing & Financial Reporting					
	Accounting, Auditing and Financial Reporting	36	34	47	48
Business Integrity					
	Bribery and Corruption	61	57	71	73
	Confidential and Proprietary Information	27	27	32	34
	Conflicts of Interest	33	30	41	45
	Data Privacy and Protection	21	21	30	30
	Free and Fair Competition	44	48	54	56
	Global Trade	38	41	48	46
	Human Rights	26	31	45	37
	Insider Trading	24	27	27	24
	Other Business Integrity	24	24	38	39
	Political Activity	14	15	20	17
	Product Quality and Safety	26	18	24	35
HR, Diversity & Workplace Respect					
	Compensation and Benefits	17	16	24	24
	Discrimination	32	31	43	43
	Harassment	28	29	39	38
	Other Human Resources	22	21	36	36
	Retaliation	34	32	40	42
	Substance Abuse	22	21	26	27
	Workplace Civility	28	28	39	40
Environment, Health & Safety					
	Environment	28	18	20	34
	Health and Safety	21	22	33	32
	Imminent Threat to a Person or Property	13	16	23	28
Misuse or Misappropriation of Assets					
	Misuse or Misappropriation of Assets	30	28	38	40
Other					
	Other	19	18	29	32

The impact of longer-duration cases is evident in the higher values seen in the mean calculations for *Case Closure Time*. The median measurement helps mitigate the impact of outliers, showing cases in most issue categories closed in 30 days or less.

In 2022, the five *Issue Types* representing the highest median *Case Closure Times* were:

- Bribery and Corruption: **57 days**
- Free and Fair Competition: **48 days**
- Global Trade: **41 days**
- Accounting, Auditing and Financial Reporting: **34 days**
- Retaliation: **32 days**

Eight *Issue Types* have a median *Case Closure Time* higher than 30 days. Some of these would likely be more complicated cases that typically take longer to investigate, especially if there is a need to engage outside counsel.

One notable finding from this metric, however, is the length of time it takes to close a Workplace Civility case – a median of 28 days. These are cases, such as bullying or abuse of power, that would likely not rise to the level of a harassment, discrimination or retaliation case that may require more investigation time. Allowing a Workplace Civility issue to fester for a month or more could have damaging consequences to the culture of the work group involved.

Case Closure Time – Distribution of Case Closure Time

More than half of organizations have a median case closure time under 30 days

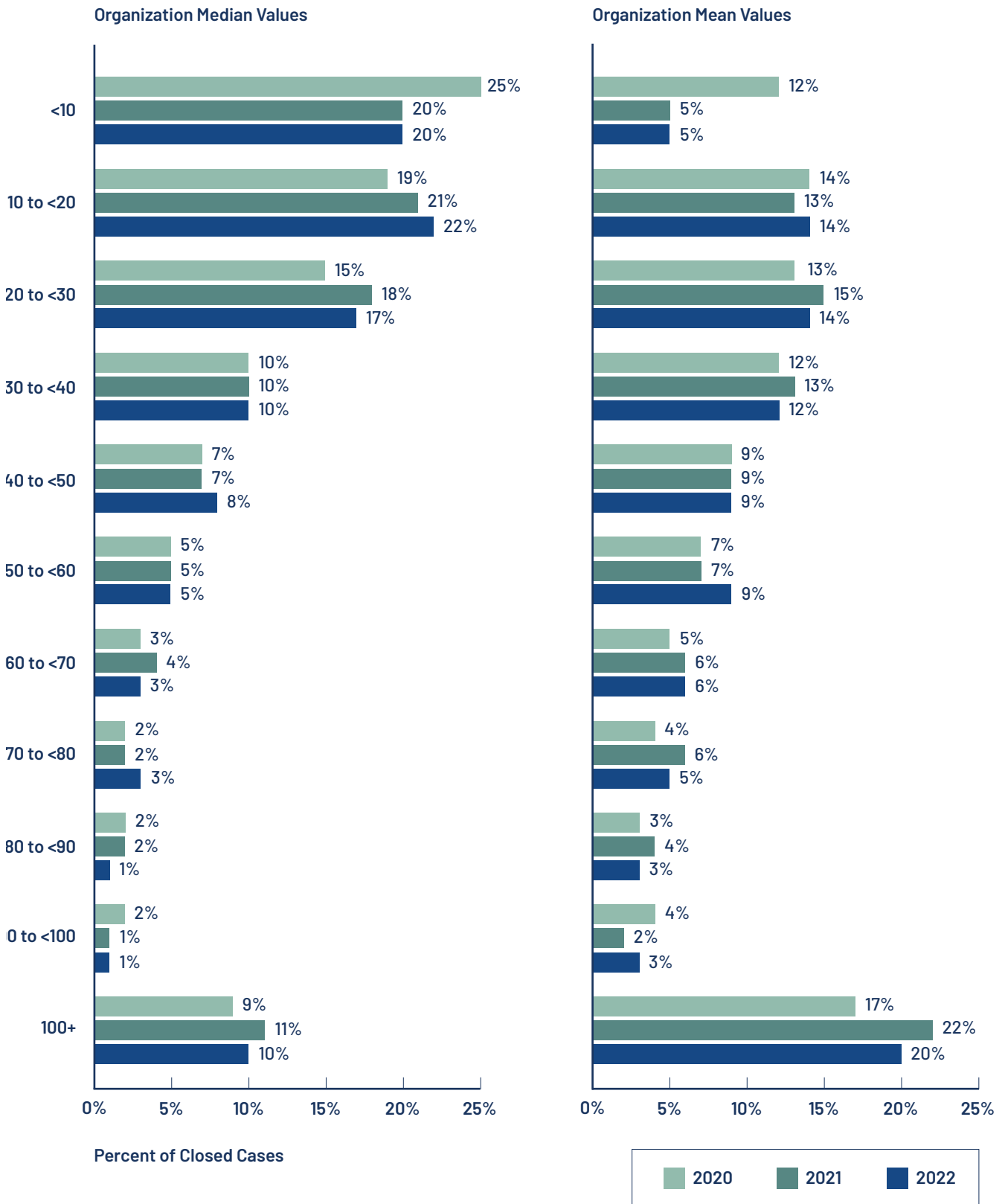
Looking at the “median of organization mean” values, the share of organizations with a mean of 100 or more days for *Case Closure Time* weighs heaviest in the distribution. This is not surprising given the significant impact of outlier cases in this calculation method, where even one long-lasting case can significantly increase an organization’s mean closure time.

The “median of organization median” values – which moderates the impact of those longer fringe cases – shows the weight tilts more heavily toward shorter *Case Closure Time*. Longer duration cases have a muted impact, with 59% of organizations having a median *Case Closure Time* under 30 days. With a *Case Closure Time* of 30 days or less considered an industry best practice, most reports are achieving this result. For others, there is an opportunity to improve.



Case Closure Time – Distribution of Case Closure Time

Frequency Distribution



Case Closure Time – Case Closure Time for Anonymous vs. Named Reports

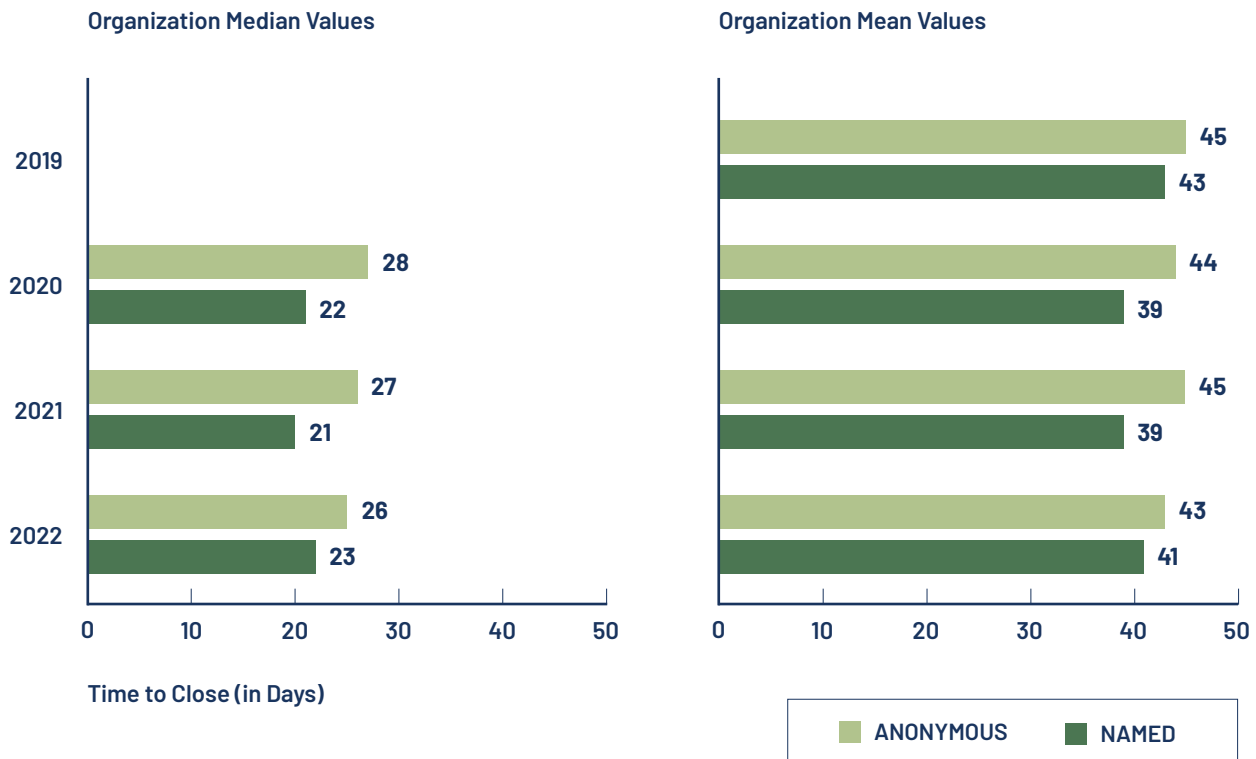
Case Closure Time for anonymous reports ticking down and approaching the rate of named reports

Looking at overall trends across the mean- and median-focused assessments, the *Case Closure Time* for anonymous reports ticked downward. *Case Closure Time* for named reports inched upward year-over-year. Pre-COVID-19, closure times for these categories were widening, but they now appear to be

coming back together. *Case Closure Time* by named reports was faster during the pandemic which may be attributable to organizations receiving fewer cases in 2020 and 2021.

Case Closure Time – Case Closure Time for Anonymous vs. Named Reports

Median Reporting Value (MRV)



Case Closure Time – Case Closure Time by Employee Count

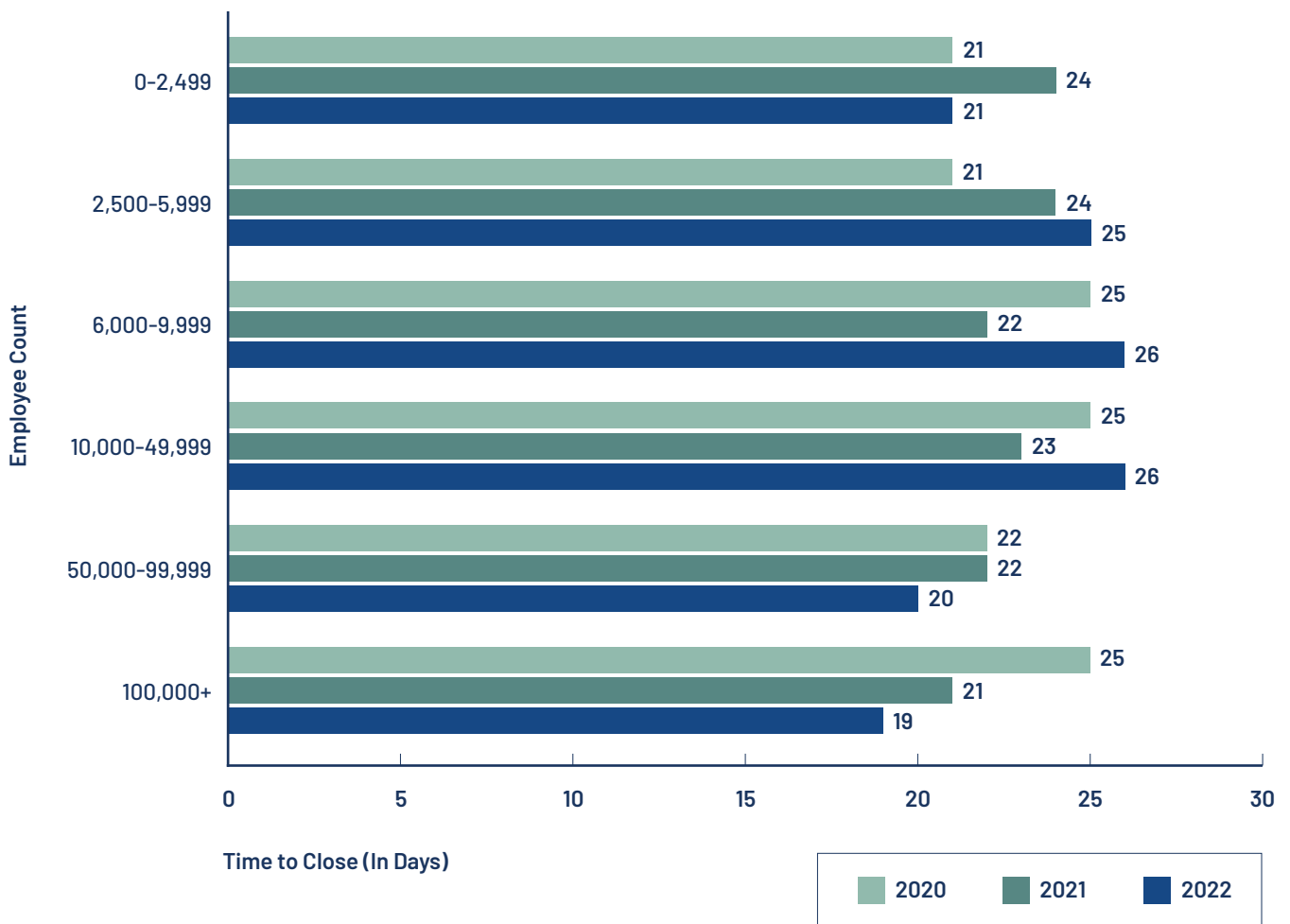
Largest organizations had the shortest Case Closure Time

Case Closure Time is a critical metric for any organization. Organizations whose size puts them in the middle of this distribution tend to have longer case closure times than the smallest and

largest. A special note for smaller organizations – the impact from even a single case is disproportionately pronounced.

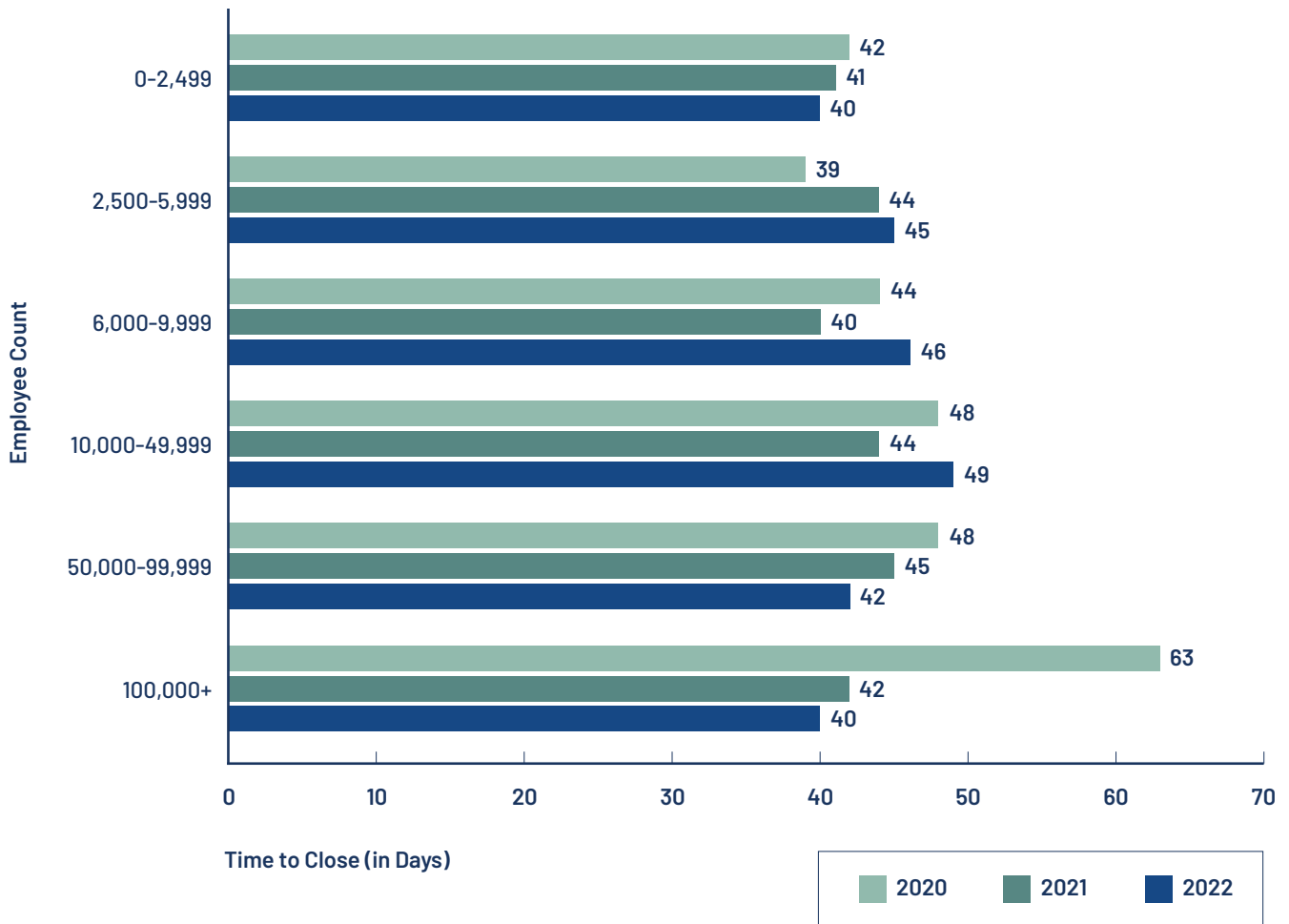
Case Closure Time – Case Closure Time by Employee Count

Median Reporting Value (MRV); Organization Median



Case Closure Time – Case Closure Time by Employee Count

Median Reporting Value (MRV); Organization Means



One again, outliers that take an unusually long amount of time to close bring up case closure times for all organizations in the “organization mean value” calculation. It is encouraging to see “organization median value” calculations, which help moderate the

impact of the most extreme variables, falling well under 30 days for all cohorts in the distribution. It is important to remember, though, that the median metric reflects that half of the organizations would be higher.

8 Time Difference Between Incident & Report Date

Time Difference Between Incident and Report Date shows no change year-over-year

Introduced in 2019, this metric measures the days between the date on which an alleged incident occurred and the date the report was made. This gap can help assess an organization’s culture, particularly around fear of retaliation.

How to calculate: Find the time difference between the alleged incident date and the date the report was made for each report. Then, calculate your mean difference by dividing the total sum of all the differences between alleged incident dates and report dates divided by the total number of cases closed. For median values, find the middle point of the data – this is an important metric to explore, as it helps lessen the impact of outliers that can have a major impact on overall metrics.

NAVEX methodology update

Previously, *Time Difference Between Incident and Report Date* was based only on organization mean values. This year, the “median reporting value (MRV) of organization mean” values and “median reporting value (MRV) of organization median” values are calculated for additional data comparisons.

FINDINGS: *Time Difference Between Incident and Report Date* was unchanged between 2021 and 2022. This is a metric to watch. Ease and willingness to report an incident internally in a timely manner makes it less likely a reporter would turn instead to an external regulator or plaintiff’s counsel.

Time Difference Between Incident and Report Date – Organization Median Comparison

IN DAYS

2021	2022
7	7

Time Difference Between Incident and Report Date – Organization Mean Comparison

IN DAYS

2021	2022
23	23

Time Difference Between Incident & Report Date – Distribution of Time Gap Between Dates

58.4% of organizations are seeing gaps between the incident and the report of 9 days or fewer



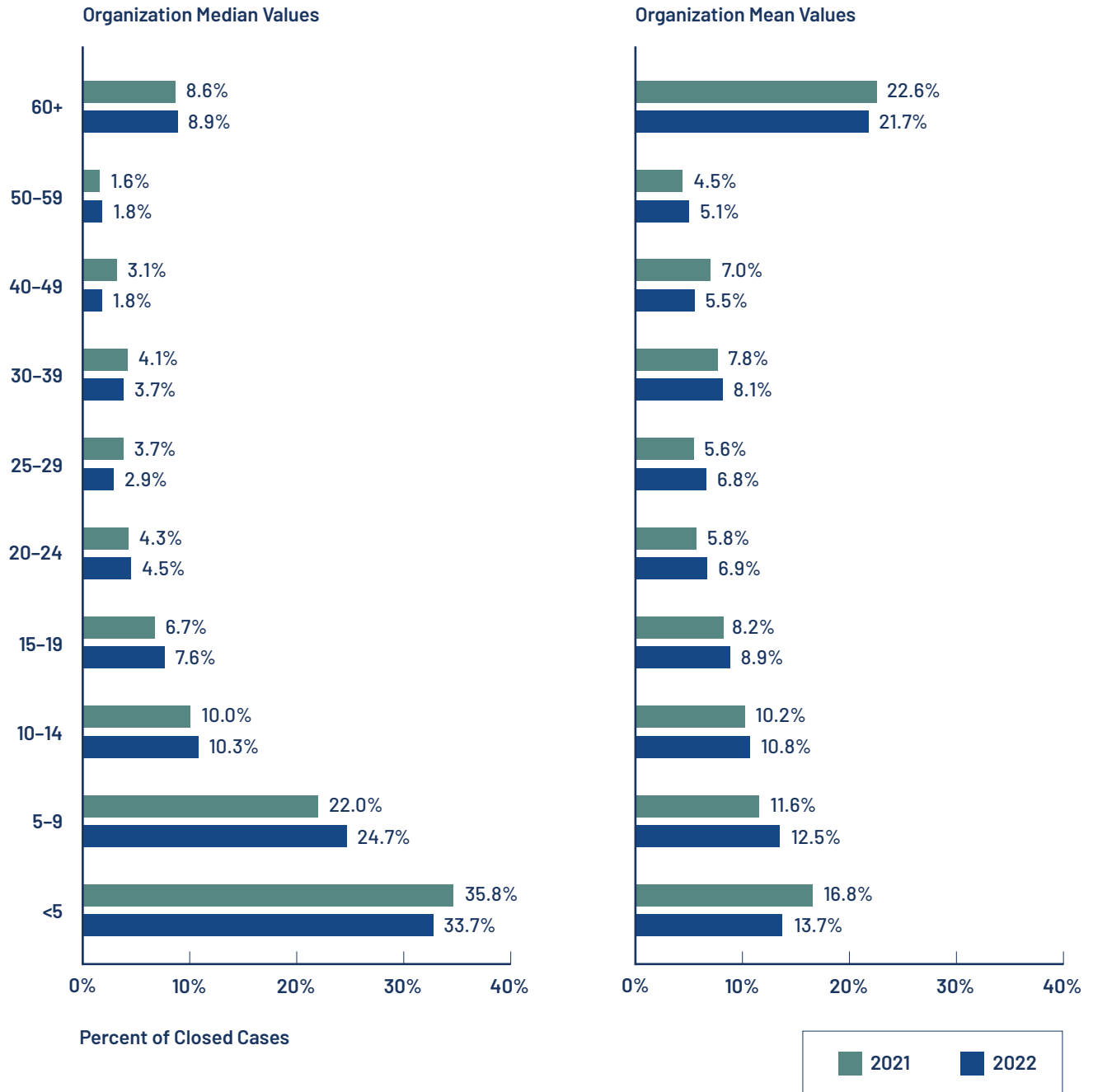
It is clear looking at the distributions of cohorts in the chart on the next page for mean gap between incident and report dates that outliers have a major impact.

When the “median of organization mean” values are used, those outliers – incidents that took an exceptionally long time to report – cause a spike in the cohort of organizations averaging a 60-plus-day gap.

The spike in the proportion of organizations in the 60-plus-day cohort is far less pronounced when median is used. By this analysis, a full 58.4% of organizations are seeing gaps of nine days or fewer.

Time Difference Between Incident & Report Date – Distribution of Time Gap Between Dates

Frequency Distribution



9 Report Outcomes

Disciplinary action or separation of employment taken in nearly half of substantiated reports

To analyze this metric, we organized *Report Outcome* results to include: discipline, no action, policy review/change, referral, separation, training and other. Also included in this section is the median *Substantiation Rate by Outcome*, which reflects the percentage of reports in each outcome category that were substantiated.

How to calculate: Sort substantiated reports into one of the seven outcomes. Divide the number of reports in each of the outcomes by the total number of reports.

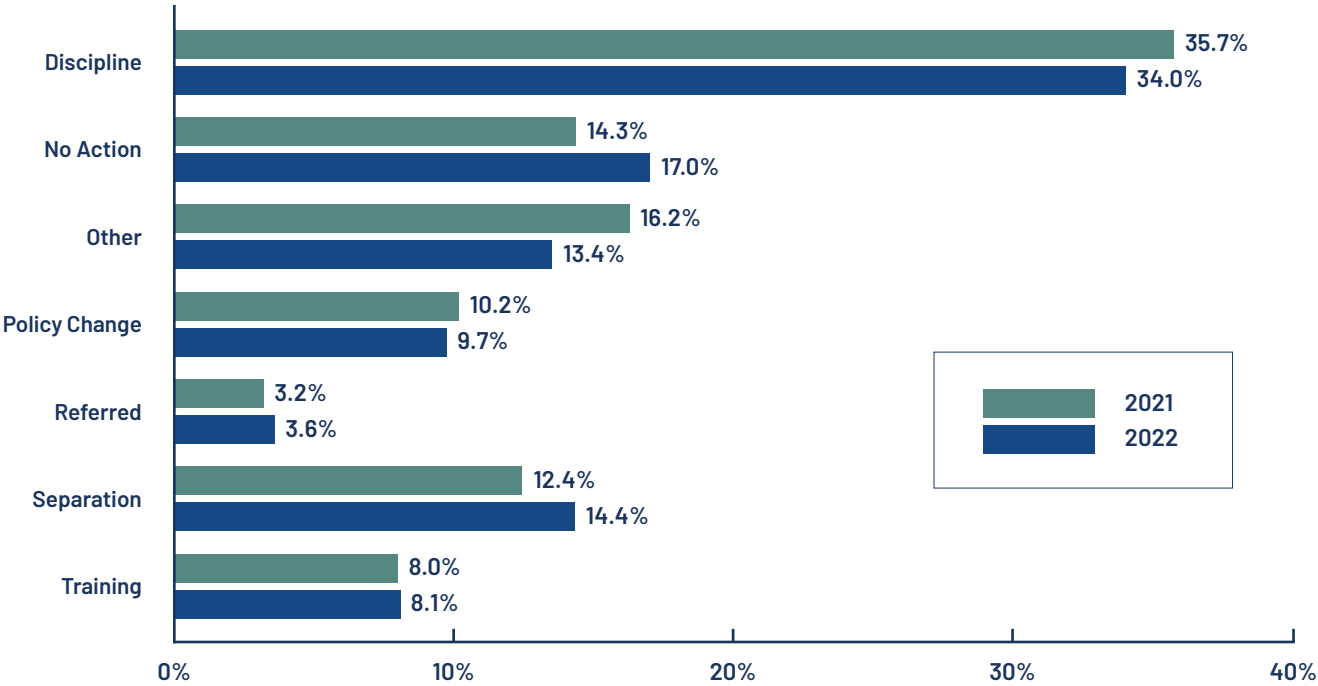
NAVEX methodology update

- Previously noted updates to the *Substantiation Rate* calculation methodology carry through to impact *Report Outcome* calculations, as these calculations use *Substantiation Rate*.
- *Report Outcome* frequencies now uses only substantiated reports (rather than all closed reports) for metrics noted as refined.

FINDINGS: Eighty-three percent of substantiated reports resulted in some kind of action in 2022. Thirty-four percent of all substantiated reports resulted in discipline, and 14.4% resulted in separation.

Report Outcomes – Report Outcomes for Substantiated Reports

Frequency Distribution, Refined



Report Outcomes – Percent of Each Outcome Resulting From a Substantiated Report

All separations, and nearly all disciplinary actions, resulted from a substantiated report

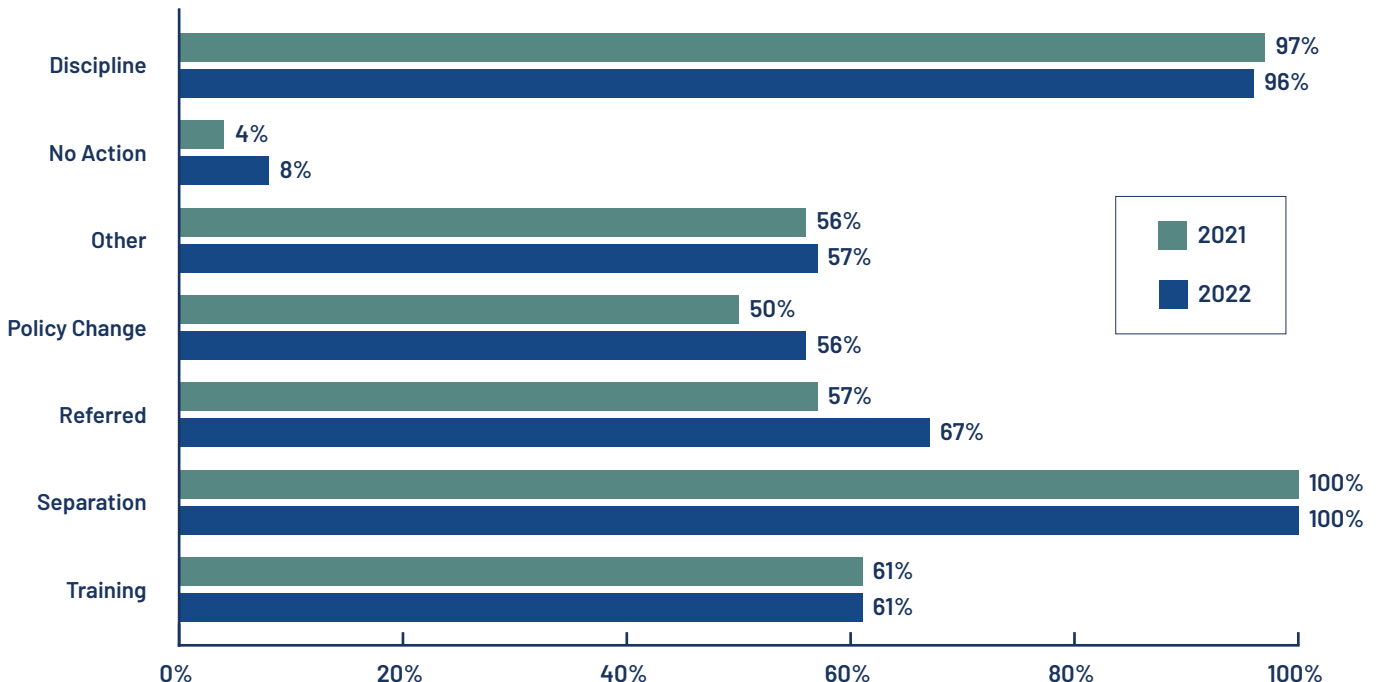
How to calculate: To identify the *Substantiation Rate* for each *Report Outcome*: sort reports into one of the seven outcomes. Then, within each outcome, divide the number of reports that were closed as substantiated or partially substantiated by the total number of reports that were closed as substantiated, partially substantiated and unsubstantiated.

NAVEX methodology update

- Previously noted updates to the *Substantiation Rate* calculation methodology carry through to impact *Report Outcome* calculations as these calculations use *Substantiation Rate*. This section will reflect refined metrics for 2021 as well.
- It is not surprising that all separations, and nearly all disciplinary actions, resulted from a substantiated report. In addition, policy changes and training were outcomes of substantiated reports approximately 60% of the time.

Report Outcomes – Percent of Each Outcome Resulting From a Substantiated Report

Median Reporting Value (MRV), Refined



Report Outcomes – Actions Taken by Benchmark Category

Substantiated Accounting, Auditing & Financial Reporting cases were the most likely to result in a separation

Substantiated Accounting, Auditing & Financial Reporting cases were the most likely to result in a separation, at 23.1% of outcomes for that category. Close to half of Misuse or Misappropriation of Assets cases resulted in discipline. The *Benchmark Category* of Other was most likely to result in no action.



Report Outcomes – Action Taken by Benchmark Category

Frequency Distribution of Action Taken

Category	No Action	Other	Referred	Policy Change	Training	Discipline	Separation	Total
Accounting, Auditing & Financial Reporting	16.4%	12.1%	4.0%	6.7%	4.5%	33.2%	23.1%	100%
Business Integrity	21.5%	16.6%	3.1%	9.6%	12.7%	26.8%	9.7%	100%
HR, Diversity & Workplace Respect	13.4%	13.1%	2.4%	6.9%	7.8%	39.1%	17.4%	100%
Environment, Health & Safety	21.5%	15.3%	5.4%	24.0%	4.7%	18.4%	10.7%	100%
Misuse or Misappropriation of Assets	9.6%	6.3%	10.1%	5.2%	4.3%	47.1%	17.5%	100%
Other	30.8%	12.8%	2.3%	13.6%	11.2%	20.4%	8.9%	100%

Appendix: Guide to Benchmark Categories and Issue Types including definitions

HR, Diversity & Workplace Respect

Issue Type	Issue Type Definition
Harassment	Reports of harassment that are linked to a protected characteristic (such as race, gender, sex, religion, disability, age, etc.) and includes allegations of unwelcome behavior that is offensive to a reasonable person, and is related to, or done because of, a protected characteristic.
Discrimination	<p>Reports of discrimination or concerns relating to accommodation requests. Discrimination generally occurs when there is a negative employment action impacting a term or condition of employment, that action is taken by the employer (which can include managers as well as others who have control over terms or conditions of work such as team leads), or the action was taken because of protected characteristic.</p> <p>A workplace accommodation involves a request to adjust something relating to work linked to either a religious practice/belief or a disability. This includes allegations or reports related to religious practices or beliefs or speaks to a workplace modification or leave request linked to a medical condition or disability.</p>
Substance Abuse	Reports related to impairment resulting from use of substances (drugs/alcohol – legal or illegal) impacting the workplace or violating a policy – can be on or off-duty and on- or off-premises including at company events.
Compensation and Benefits	Reports related to matters of compensation, pay, insurance, time-off, retirement benefits, leaves of absence (paternity, maternity, other medical) and other common employee benefits. Examples could include incorrect paycheck or inaccurate recording of vacation/time-off/sick time.
Workplace Civility	Reports related to abusive or disrespectful behavior connected to work that are not harassment or discrimination.
Other Human Resources	Reports that cannot be categorized elsewhere and likely involve Human Resources. Examples include performance management, discipline, immigration, labor relations, grievances, job eliminations, arrests and convictions, and the sale or distribution of drugs.
Retaliation	<p>Reports of retaliation/reprisal of any kind against an employee including claims of any action taken to punish or dissuade an employee from making a report or participating in an investigation either internally or externally. Retaliation claims most often involve allegations against a manager, supervisor or some other person with control and power over the reporting person. However, retaliation can also involve conduct by a coworker.</p>

Business Integrity

Issue Type	Issue Type Definition
Conflicts of Interest	Reports about a conflict of interest, either a self-report or a report involving the behavior of others. A conflict of interest can arise in any situation where an employee's financial or personal interest could potentially or actually interfere, or even appear to interfere, with their business judgement or the interests of the organization.
Confidential and Proprietary Information	<p>Reports related to confidential and proprietary information or intellectual property. Confidential information is any non-public information that is not intended or permitted to be shared beyond those with a genuine business need to know the information.</p> <p>Confidential information can include information about people or companies and specifically includes business plans, trade secret information, customer lists, sales and marketing strategies, pricing, product development plans, and any notes or documentation of the foregoing.</p> <p>Intellectual property refers to an original, intangible creation of human intellect that is legally protected from unauthorized use. Intellectual property includes patents, trademarks and copyrighted works of authorship, like photographs, music, literary works, graphic design, source code, and audio and audiovisual recordings.</p>
Data Privacy and Protection	Reports related to the rights and responsibilities relating to data held or processed by an organization. This data can include data about employees, customers, consumers or others. Examples include allegations of data misuse, loss or theft of data, breaches or attempted breaches or requests by an individual relating to their own data.
Free and Fair Competition	Reports involving activities that undermine free and fair competition in the marketplace. These activities frequently involve any agreement with a competitor to fix prices or otherwise limit competition. Even the appearance of such agreement is problematic.
Bribery and Corruption	Reports of public or private instances of bribery. Bribery occurs when a person offers money or something else of value – to an official or someone in a position of power or influence – for the purpose of gaining influence over them. Corruption includes dishonest or illegal behavior – especially of people in authority – using their power to do dishonest or illegal things in return for money or to get an advantage over someone else.
Insider Trading	Reports that a person is buying or selling any company's (employer's or any other company's) securities/stock based on non-public information as well as passing (tipping) this information on to someone else who then buys or sells stock.
Global Trade	Reports related to the import and export of goods and services globally. It can include imports (bringing goods or services into a country) or exports (sending goods or services – including software – from one country to another). This category also includes reports relating to sanctions/trade sanctions (people or countries) which make it unlawful to do business with sanctioned people or countries.
Political Activity	Reports of improper use of employer resources (time, assets, brand, etc.) for political activity (by an individual or an organization) such as using work time for political activities, pressuring colleagues to give money or time to a political action committee (PAC) or associating organization name with a political candidate/official/group. It can also include misuse of company funds for political activities, using company resources to create or distribute political messages and violations of lobbying regulations and restrictions.

Business Integrity (continued)

Issue Type	Issue Type Definition
Human Rights	Reports related to human rights which generally refer to the basic rights and freedoms of individuals. Examples include reports relating to human trafficking or modern-day slavery that involve the use of force, fraud or coercion to obtain labor or sex for money, drugs or other goods.
Product Quality and Safety	Reports about quality and safety issues related to products. Examples include allegations that a product is not safe for intended use, is putting others at risk of harm or that it fails to meet industry standards.
Other Business Integrity	Reports related to business integrity that cannot be categorized elsewhere. Examples include industry-specific policies, regulations or laws.

Accounting, Auditing & Financial Reporting

Issue Type	Issue Type Definition
Accounting, Auditing and Financial Reporting	Reports related to accounting, financial reporting or auditing. Examples include the unethical or improper recording and analysis of the business and financial transactions associated with generally accepted accounting practices. Examples include misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of GAAP principles, and wrongful transactions.

Misuse or Misappropriation of Assets

Issue Type	Issue Type Definition
Misuse or Misappropriation of Assets	Reports that the organization's assets are being wasted, inappropriately used, abused, or not properly protected. This category can include a wide array of assets such as property, tools, money/credit cards, facilities, company vehicles, employee time and even abuse of employer provided benefits.

Environment, Health & Safety

Issue Type	Issue Type Definition
Imminent Threat to a Person, Animals or Property	Reports of imminent or immediate threat of harm to a person or people, animals or property. Reports may or may not involve a weapon and generally are the kind of incident where authorities (such as police or fire) are called to assist.
Environmental	Reports about impact to the environment. This could include intentional, negligent or accidental acts or omissions that harm the environment or violate policy, regulatory or legal requirements. It can also include acts or omissions that otherwise present a risk to the climate. Examples can include such things as spills, mismanaged wastewater or resources, release of harmful materials or substances into the atmosphere or improper disposal of hazardous waste.
Health and Safety	<p>Reports about workplace safety. This can include employee safety and facilities or equipment. Each employee is responsible for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.</p> <p>Reports about concerns such as a threat of assault or violence (not including an imminent threat).</p> <p>Reports about physical security in a facility.</p>

Other

Issue Type	Issue Type Definition
Other	Reports that do not fit any of the other categories listed.

Let's Talk Statistics: Distributions, Assumptions and Their Implications

Throughout this report we reference a number of statistical terms when discussing calculation methodologies.

What is a distribution?

A distribution is a set of numbers considered as a whole.

Defining average: mean vs. median vs. mode

There are three primary calculations when considering what is "average" for a set of numbers:

- **Mean:** the sum of all values divided by the number of values summed
- **Median:** the number at the exact middle point of a sorted distribution
- **Mode:** the most repeated value in a distribution. Mode is not used for any of the statistics presented in this report.

This report primarily presents medians because it mitigates the influence of extremely high and low values in the distribution, called outliers. To illustrate the impact of outliers, we can consider the following two distributions:

DISTRIBUTION A: {1, 2, 3, 4, 5}

DISTRIBUTION B: {1, 2, 3, 4, 490}

If you take the mean of Distribution A, you will get 3. If you take the mean of Distribution B, you will get 100. In both of cases, the median is 3. That median value is much closer to the values of 1, 2, 3 and 4 than the mean.

We consider both median and mean values for select metrics. Doing so allows our readers to both ensure they are comparing against the correct metric for their internally calculated statistics and affords insight into how skewed the distributions of those metrics are.

Skewed distributions

A distribution is said to be skewed when the values are not evenly spread in both directions from the median. A skewed distribution can make it more challenging to analyze the data in the distribution. In fact, out of the three calculations of what is "average" in a distribution, the mean is most affected by a skewed distribution.

If there are some values above the median that are comparatively high, that distribution is said to be skewed high and the mean will be higher than the median. The converse is true when you have a distribution which is skewed low.

A classic example of distribution which is skewed high is income in the United States; as of 2021, the mean income was \$97,962, while the median was \$69,717. This gap in median and mean income calculations is due to a relatively small number of very high incomes.

Examples and implications of altering a distribution

Let's consider the following distribution:

{1, 2, 3, 5, 6, 8, 9, 12, 17}

We can see that the median is the highlighted figure 6 and calculate the mean as $(63 / 9) = 7$. This implies that the distribution is skewed high, which makes sense when considering the values 12 and 17 in relation to the rest of the distribution.

Now let's trim the top and bottom values, leaving us with this distribution:

{2, 3, 5, 6, 8, 9, 12}

The median does not change, however when we calculate the mean, we get ~ 6.42 , lower than the value calculated on the distribution before trimming off the top and bottom values. Methods like this are used to reduce the influence of very high and very low values on the calculation of means while leaving the median unchanged.

There are times when using rules to remove values from a distribution can have unintended consequences for calculated statistics. Let's consider a situation where we have a rule to exclude values of 0 and 1 when calculating statistics and this distribution:

{0.1, 0.2, 0.3, 0.4, 0.5, 0.6, 0.7, 0.8, 0.9}

With the distribution as it stands, this has no impact on median or mean, both of which are 0.5. Now let's say that a situation arises which decreases the values in the distribution to this:

{0, 0, 0, 0.3, 0.4, 0.5, 0.6, 0.7, 0.8}

If we take the median and mean of this distribution excluding the zero values, we get a mean and median of 0.55, higher than the calculations on the original distribution with overall higher values. Taking the zeroes into account, the median comes out to 0.4 and the mean to ~ 0.367 , much more reflective of the new situation.

Hopefully, this appendix has illustrated the need for careful consideration and research of a distribution, and a solid fundamental understanding of what statistic is needed when asking questions about compliance or any other data.

- There are three ways to consider what is average in a distribution: mean, median and mode.
- Skewed distributions affect means much more than medians.
- Making changes to a distribution will almost always change calculated statistics.

About the Authors

Carrie Penman

Chief Risk and Compliance Officer, NAVEX

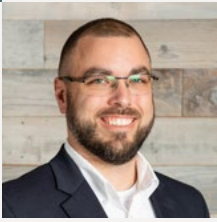
As one of the earliest ethics officers in the industry, Carrie Penman has been with NAVEX since 2003 after serving four years as deputy director of the Ethics and Compliance Officer Association (ECO), now ECI. A scientist by training, she developed and directed the first corporate-wide global ethics program at Westinghouse Electric Corporation from 1994-1999.

As chief risk and compliance officer for NAVEX, Carrie leads the company's formal risk management processes. She also oversees its internal ethics and compliance activities employing many of the best practices that NAVEX recommends to its customers.

Carrie has extensive client-facing risk and compliance consulting experience, including more than 15 years as an advisor to boards and executive teams; most recently as NAVEX's SVP of Advisory Services. She has also served as a corporate monitor and independent consultant for companies with government settlement agreements.



Carrie was awarded the inaugural Lifetime Achievement Award for Excellence in Compliance 2020 by Compliance Week magazine. In 2017, Carrie received the ECI's Carol R. Marshall Award for Innovation in Corporate Ethics for an extensive career contributing to the advancement of the ethics and compliance field worldwide.



Aaron Aab

Associate Vice President,
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Aaron joined NAVEX in 2017, and now serves as the Associate Vice President of the customer support and data analytics team. With a Bachelor of Science degree in business administration from Warner Pacific University, Aaron is driven by his passion for data and its transformative effects on organizations. He brings his leadership skills to bear in streamlining reporting processes, implementing best practices and ensuring an exceptional customer experience.



Dan Buckwell

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Architect, NAVEX

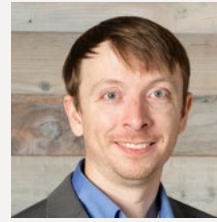
Dan entered the ethics and compliance industry in 2018 and has since been involved with benchmark reporting at both Expolink Europe and NAVEX. With a background in software engineering, Dan's role focuses on the development and improvement of NAVEX's analytical tools and capabilities.



Eric Gneckow

Content Marketing
Manager, NAVEX

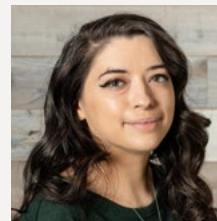
As content marketing manager for NAVEX, Eric supports the creation of various thought leadership publications on behalf of the organization's subject-matter experts. A one-time reporter, he previously led the content team behind a national portfolio of cybersecurity conferences.



Andy Harmsen

Associate Data Manager,
NAVEX

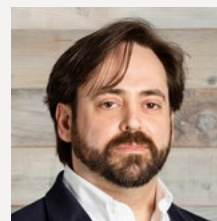
Andy became a data analyst at NAVEX in 2021. Drawing on his expertise in analytics and web development, he has been instrumental in facilitating improvements to data integration and upstream enhancements to data integrity.



Isabella Oakes

Senior Data Analyst, NAVEX

Isabella started working at NAVEX in 2021 as a data analyst. She obtained her M.S. in applied data science from University of San Diego, and has a background in psychology, sales and customer service analytics. She uses her skills and focus on data ethics to improve business practices and customer experiences. She has been published on the USD MS-ADS blog in an article discussing the importance of women in data science.



Anders Olson

Senior Data Scientist, NAVEX

Anders transitioned from a career in banking to join NAVEX in 2020 as the company's inaugural data scientist. Since then, he has been instrumental in enhancing the data ecosystem, leveraging his expertise in applied economics to analyze and improve compliance-related human behavior data.



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