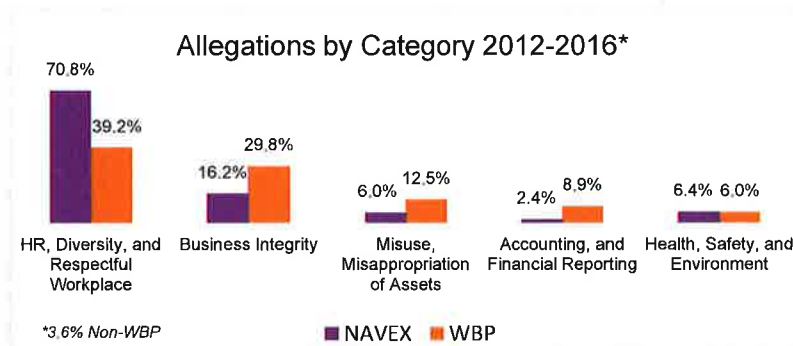
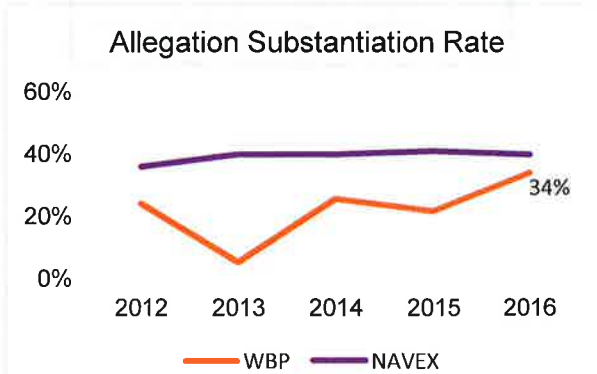


## 2. Initiative Briefing:

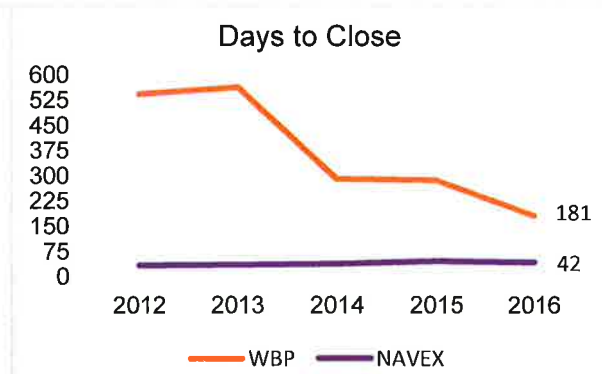
With this 10-year milestone marking Council Policy CC026 establishing the Whistle-blower Program (WBP), we have introduced benchmarking to evaluate the program's performance, effectiveness, and value, and to identify areas for improvement. Comparison of WBP utilization statistics to aggregate hotline data compiled by NAVEX Global<sup>1</sup>, indicates that the WBP is operating generally within global norms and providing value to The City.

The receipt, assessment and triage of 878 allegations of suspected waste and/or wrongdoing since 2007 have resulted in the completion of 498 investigations with a substantiation rate of 24%. Since 2012, the rate has trended toward the NAVEX averages, reaching 34% in 2016. Increased program awareness, higher quality of concerns submitted, and updated procedures have contributed to this positive trend.



The categorization of allegations received can reveal program effectiveness, gaps, and successes. The WBP data indicates that the nature and frequency of concerns reported are generally consistent with those reported to other organisations.

The timely completion of investigations is critical to building trust and demonstrating that concerns reported to the WBP are important and taken seriously. WBP procedures afford each concern raised an appropriate investigation. Since 2012, the aging of WBP investigations has trended toward NAVEX figures. Contributing to this positive trend has been an increase in WBP staffing and implementation of more robust investigative practices.



The WBP has delivered added value by providing Management with 233 recommendations and identifying opportunities for mitigating future occurrences based on underlying causes of procedural failure or control weaknesses. In support of increased transparency and program confidence, starting in 2017, investigation recommendations are posted quarterly on the WBP website.

The introduction of regular benchmarking is key to measuring ongoing program performance. Going forward, we will set target expectations for deliverables such as case closure and substantiation rates, ensuring their alignment to best practice ranges, and will monitor and track additional metrics such as intake methods, and internal/external reporting volumes.

<sup>1</sup> The NAVEX Global 2017 Ethics & Compliance Hotline & Incident Management Benchmarking Report comprises data (2012-2016) from over 927,000 individual hotline reports disclosed by more than 2,000 organizations representing 26 industries and 38.5 million employees globally.

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