



Swiss TPH Tell-Us System Policy

EQS Integrity Line

Approval Direction: 06.08.2021
Last update: 07.12.2021

TABLE OF CONTENTS

TABLE OF CONTENTS.....	2
1. General provisions	4
1.1 Purpose.....	4
1.2 Description.....	4
1.3 Scope.....	4
1.4 General reporting process	5
1.5 User role and definition.....	5
1.6 Languages.....	6
2. Regulation on the use of the EQS Integrity Line reporting platform of Swiss TPH.....	6
2.1 Obligations for the Case Managers	7
2.1.1 Intend purpose only	7
2.1.2 Duty of confidentiality.....	7
2.1.3 Duty of protection of the Reporting Persons.....	7
2.1.4 Absence of conflict of interest	7
2.1.5 Additional obligations for the Administrator and Content Managers.....	8
2.2 Information Security	8
2.2.1 Data protection & information security	8
2.2.2 Logging and Access to the platform.....	8
2.3 Compliance with laws and regulations.....	8
3. Case manager Guidelines	9
3.1 Reporting process	9
3.2 Grant of the User's right.....	9
3.3 Processing times.....	9
3.4 Incident severity	9
3.5 Case Investigation.....	10
3.6 Reporting.....	10
3.7 Implementation of measures.....	10
3.8 Communication	11
3.9 Support.....	11
4. Rights of the Reporting Persons	11
4.1 Assurance of no disadvantages	11
4.2 Respect of the data privacy	12
4.3 Right to Anonymity	12
4.4 Right of Information	12
4.5 Right of Withdrawal	12
4.6 Physical and psychological protection	12
5. Sanction in case of misuse	13
Appendix A: Case management process	14

Appendix B: Case reporting flow15

1. GENERAL PROVISIONS

1.1 Purpose

Excellence in governance is a high priority of Swiss TPH. The Institute does not tolerate any misconduct or malpractice and hence aim to remedy conditions that violate legal and moral-ethical provisions. For this reason, and in accordance with our guiding principles, Swiss TPH has implemented a Tell-Us System with which employees, students and third parties can report grievances, abuses, harassments, fraud or other kind of misconduct and malpractice.

This document defines the policy regarding the use of the EQS Integrity Line reporting platform of Swiss TPH (“Tell-Us System” or “the Platform”). This Tell-Us System is part of the Governance, Risk and Compliance strategy of the Institute. Its principal goals are to reinforce the safety, the security and the respect of the physical and psychological integrity of the Swiss TPH’s employees as well as to safeguard the interests of the institution.

1.2 Description

The “Tell-Us System” is a digital reporting system accessible worldwide 24/7 via an internet webpage, which is run over a platform provided by EQS Group (www.eqs.com). This solution offers:

- the possibility to report incidents, anonymously or non-anonymously, while ensuring the security and the confidentiality of the reporting person ; and
- the opportunity for employees, as well as external parties, to have a direct contact to the management.

The objectives pursued by developing an independent reporting mechanism are to:

- prevent frauds and misconducts ;
- achieve and maintain work standards that comply with all ethical and legal requirements ;
- identify security breaches within the Institute ;
- increase the transparency within the Institute ; and
- improve the quality of our work.

1.3 Scope

This Tell-Us System policy applies to all users who are granted of a "Case Manager" or an "Administrator and Content Manager" access to the Platform of Swiss TPH, to the “End Reporting Manager” and to the “Reporting Persons”.

Six topic areas are covered in the “Tell-Us System”. These reporting streams are handled independently by a dedicated Case Manager and are accessible via the “Incident Reporting” function of the “Tell-Us System” front page:

- **Human Resources related matters**
Sexual and any other kind of harassment (verbal or written denigration, improper physical, verbal or non-verbal behaviour), workplace bullying as well as discrimination based on age, disability, marital status, nationality, ethnicity, skin colour, religion, gender, sexual orientation or gender identity can be reported via this reporting stream.
- **Financial related matters**
Internal fraud (corruption, conflict of interest, bribery, asset misappropriation of cash or of assets, financial statement fraud) as well as external fraud (involving external third parties)

can be reported via this reporting stream. This also includes irregularities, collusion or manipulation of procurement processes.

- **Health, Safety, Security & Environment**

Report information, concerns or violations of applicable laws and regulations regarding occupational safety, security, health and environmental protection at Swiss TPH.

- **Research Ethics & Scientific Integrity**

Any information, concern or suspicion of violation of “Research Ethics” (unethical procedures, mainly in research involving human beings) or of “Scientific Integrity” (good scientific practices, as defined in the Code of Conduct and the Integrity Regulations of the University of Basel) relating to Swiss TPH research can be reported via this reporting stream.

- **Information Security & Data Protection**

Report information, concerns or suspicions of Information Security or Data Protection breaches relating to Swiss TPH.

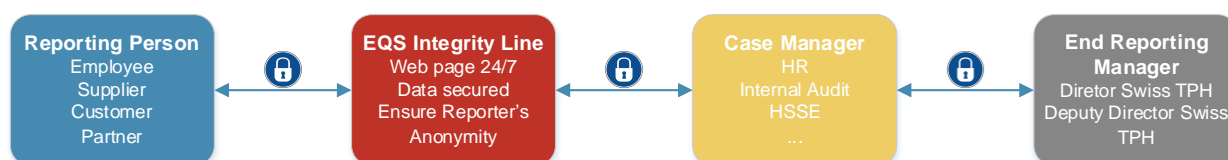
- **Travel Safety & Security**

Report information, concerns or suspicions of breaches of the Swiss TPH Travel Safety and Security regulations and guidelines.

Note: The detailed case reporting flow is available in the Appendix B of the document.

1.4 General reporting process

The general reporting process between the Reporting Person, the Platform and Swiss TPH is as follows:



1.5 User role and definition

The Platform comprises four user levels that are defined as follows:

Reporting person

Any person who would like to report an incident, ask a question or share an idea, anonymously or not (See 4.2 [Right to Anonymity](#)), to the management of Swiss TPH. Internal (employees, students) as well as external parties (suppliers, customers, partners...) can directly have access to the front-end webpage of the Platform through his/her web browser:

<https://swisstph.integrityline.org/>

Case Managers

Person in charge of handling the reports submitted by the Reporting Persons. They have access to the cases through the back-end webpage of the Platform:

<https://swisstph.integrityline.org/integrity-backend/>

Case Managers receive automatic and immediate access to cases relating to their dedicated reporting stream. Due to the potential sensitivity and the confidentiality of the information reported,

the Case Managers can only have access to the reports that concern the topic they are responsible for. (See 1.3 [Scope](#)).

The Case Managers can directly dialogue with the Reporting Persons through the Platform. They collaborate with the other Case Managers while ensuring to keep strict confidentiality about the information they are handling. At least once a year, the Case Managers report on the incidents they are treating to the End Reporting Manager.

Administrator and Content Manager

The Administrator and Content Manager is the person responsible for the maintenance of the Platform and is the key contact person with EQS Group. He/she also provides support to the Case Managers if necessary. Moreover, he/she has the following additional rights:

- create and deactivate users' rights ;
- assign case access rights if not automatically assigned through a specific tree exit ;
- view users audit trail ; and
- adjustment of the platform texts and questionnaires as well as the reporting process and categories.

Two persons must always have the role of Administrator and Content Manager to ensure a service continuity and a mutual control over the function.

The Administrator and Content Manager has also the responsibility to start handling the case with the End Reporting Manager and to answer to the Reporting Person within ten (10) working days if a Case Manager is not able to assume his/her function.

End Reporting Manager

Person that is ultimately in charge of the reporting stream and receives the cases and annual reports from the Case Managers. He/she provides support and advice to the Case Managers when needed, decides corrective measures and or sanctions, if necessary and is responsible of the correct communication and application of the measures retained.

1.6 Languages

The front-end page of the platform will be accessible in three different languages:

- English
- German
- French

The answer to the Reporting Person should be given in the same language as the one that has been used to report the case. However, if this is not possible or not adapted, an answer in English is also allowed.

2. REGULATION ON THE USE OF THE EQS INTEGRITY LINE REPORTING PLATFORM OF SWISS TPH

The highest ethical standards and a strong personal integrity are required when using the Platform or any information obtained through it.

A careful attention should be brought to the Manual for Employees of Swiss TPH and a particular reference is made to the following documents:

- Code of Conduct ;

- Terms of use of the intranet, internet and email ; and
- Regulation on the handling of data.

Moreover, a special emphasis is drawn on the following aspects:

2.1 Obligations for the Case Managers

2.1.1 Intend purpose only

The Platform of Swiss TPH can only be used for professional reasons and with the final goal of protecting the Swiss TPH and its employees. All misuse of the Platform or use of information obtained through it for personal interest will be subject to sanctions (See 5. [Sanction in case of misuse](#)).

2.1.2 Duty of confidentiality

The Case Managers commit not to disclose any information that they obtained through the Platform. This provision also remains valid beyond the duration of their role as Case Manager and their employment relationship with Swiss TPH.

Any breaches to this duty could potentially:

- contravene to the right to the protection of personal privacy of the Swiss TPH employees according to article 328 of the Swiss Code of Obligations (OR) ;
- jeopardize the psychological or the physical integrity of the Reporting Person ; and
- lead to financial or reputational damages for the Institute.

2.1.3 Duty of protection of the Reporting Persons

The Case Managers contribute to the protection of the personality and the protection from discrimination and harassment of the Reporting Persons in accordance with the Code of Conduct of Swiss TPH.

Depending on the specific situation experienced by the Reporting Person and the dangers incurred, the Case Manager should indicate to the Reporting Person which bodies can be contacted, internally (HR, persons of trust Swiss TPH...) or externally (police, psychological support service...).

Moreover, in case the psychological or the physical integrity of the Reporting Person is endangered, the Case Manager must immediately inform the Crisis Management Team (“CMT”) Leader (Director of Swiss TPH) and the CMT Coordinator (Safety and Security Officer) that will trigger the Swiss TPH critical incident management and contingency plan. The CMT is then responsible for implementing all necessary measures to safeguard the psychological and the physical integrity of the Reporting Person.

For more information regarding the emergency cases, please refer to the dedicated intranet webpage:

[Emergency Organization](#)

2.1.4 Absence of conflict of interest

The Case Managers must actively avoid any conflict of interest.

If a Case Manager faces a situation where he/she could have a conflict of interest, he/she must immediately disclose it and contact the Administrator and Content Manager that will, in agreement with the End Reporting Manager, forward the incident to another competent Case Manager.

2.1.5 Additional obligations for the Administrator and Content Managers

The Administrator and Content Manager user right can only be used for the functions defined in the paragraph 1.5 User role and definition, [Administrator and Content Manager](#). All misuse of the platform or use of information obtained through it for personal interest will be subject to sanctions (See §5 [Sanction in case of misuse](#)).

2.2 Information Security

2.2.1 Data protection & information security

According to the contract and the “Data Processing Exhibit for EQS Cloud Services”, EQS Group is responsible for ensuring the security of the platform and of the data that transit through it. (Duties of EQS, §3.7).

They are especially required to respect the following commitments:

- all data is stored in a certified high-security data centre ISO 27001-certified located in Switzerland ;
- ensure a secure platform, certified ISO 27001 and subject to regular penetration tests by independent third parties ; and
- all report data is stored highly encrypted and only the Case Managers have access to the decrypted data with his/her personal login data.

2.2.2 Logging and Access to the platform

The Case Managers can access the back-end webpage of the platform via a two steps login process (2-factor authentication):

- Individual User Name and Password ; and
- Unique Code for each connection obtained per mail or through his/her smartphone (QR Code reader App).

The Case Managers must not communicate his/her User name and/or Password or give access to the platform to any other employee or third party.

2.3 Compliance with laws and regulations

According to the contract and the “Data Processing Exhibit for EQS Cloud Services”, EQS Group is responsible for ensuring the compliance of the platform with national and international laws and regulations (Duties of EQS, §3.8).

“3.8. EQS Group regularly monitors internal processes and technical and organizational measures to ensure that processing in its area of responsibility is carried out in accordance with the requirements of applicable data protection legislation and that the rights of the data subject are protected.”

They are especially committed to make sure that the platform respect the following regulations:

- General Data Protection Regulation of the EU (GDPR) ; and
- Swiss Data Protection Act, to be revised.

3. CASE MANAGER GUIDELINES

3.1 Reporting process

The detailed reporting process is available under the Appendix A: Case management process.

3.2 Grant of the User's right

The user roles Case Managers and Administrator and Content Managers can only be granted upon formal approval of the Director of Swiss TPH.

The Administrator and Content Manager then manages the user roles in the platform.

3.3 Processing times

The Reporting Person receives an automatic acknowledgment of receipt from the EQS platform when submitting his/her report.

The Case Manager must give a first answer to the report within ten (10) working days after reception of the Report. *Note: For the Information Security and Data Protection reporting stream, the reporting to authorities (e.g. in case of data breaches) should happen within 72 hours.*

The Reporting Person must be informed within three (3) months of the status of the internal investigation and its outcome and the eventual action taken.

3.4 Incident severity

An indicative table of incident severity has been provided below. The fulfilment of a condition of one of these three criteria (Human, Reputational or Financial damages) is sufficient to reach the concerned severity threshold. Please note that this table is only provided for information. The professional judgement exercised by the Case Manager is over all key to evaluate the severity of an incident reported.

Level of Severity	Human	Reputational	Financial
Low	Psychological or physical integrity of the Reporting Person not endangered	No reputational damages identified for the Institute	< CHF 100'000
Medium	Psychological or physical integrity of the Reporting Person potentially endangered	Potential reputational damages identified for the Institute	> CHF 100'000 and < CHF 500'000
High	Psychological or physical integrity of the Reporting Person certainly endangered	Severe and/or certain reputational damages identified for the Institute	> CHF 500'000

Medium and High severity incidents require an immediate action from the Case Manager:

- immediate information of the End Reporting Manager ;
- safeguard measures for the Reporting Person and/or the Institution ;
- obligation to open an investigation.

In case of doubt concerning the severity of the incident, the Administrator and Content Managers and the End Reporting Manager can be consulted. Moreover, the Swiss TPH Risk Matrix can also be consulted to give further indications.

3.5 Case Investigation

Medium and High severity incidents always require an investigation. The investigation of a low-severity incident is at the decision of the Case Manager, based on his/her professional judgement.

A non-investigation must be justified and all such cases must be listed and presented once a year in the annual report to the respective End Reporting Manager.

The investigation must be followed according to the specific methodology of the concerned Case Manager Service / Unit.

3.6 Reporting

Case Reporting

Each incident must lead to a report writing by the Case Manager:

- justifying the non-investigation if such a decision is taken, given the element collected by the Case Manager ; or
- describing the investigation performed, the conclusion of the investigation and the recommendation of corrective measures if necessary.

Reports are to be written according to the specific methodology of the concerned Case Manager Service / Unit.

When finalized, the reports must be submitted to the End Reporting Manager responsible for the concerned reporting stream. If the End Reporting Manager is him/herself involved in the case, the report should be submitted to the alternative reporting entity after discussion with the Administrator and Content Managers.

Note: The Case Managers have also the possibility to create her/himself a case in the Platform to process an incident that has been reported outside the Platform (Mail, phone...) and / or for the purpose of following his/her cases annual statistics.

Annual Case Manager Reporting

The Case Manager prepares an overview of all cases treated during the year, including those that have not been investigated.

The timing for this annual reporting must be determined in agreement with the responsible End Reporting Manager.

3.7 Implementation of measures

A systematic evaluation of each case (cause analysis, likelihood of occurrence, analysis of eventual internal control deficiencies...) must be performed in order to draw lessons and avoid, if possible, such incidents to happen again.

The Case Manager is primarily responsible for suggesting cause-related recommendations to the End Reporting Manager.

The End Reporting Manager has then the final responsibility to decide which recommendation must be retained and/or submitted to further organizational structures within Swiss TPH if necessary (Board of Directorates, Board of Governors).

The End Reporting Manager has also the responsibility to ensure that the retained recommendations are turned into measures actually applied and communicated.

3.8 Communication

The Case Manager is responsible for informing the Reporting Person on the status of the internal investigation and its outcome and the eventual action taken.

The End Reporting Manager is responsible for making sure that the defined actions and eventual corrective measures are properly communicated, as a first step to avoid that this kind of incidents happen again.

3.9 Support

A support can be granted to the Case Managers by the following means:

- the online manual directly available on the platform ;
- the One-time Web User Training provided by EQS to the Case Managers that will be recorded and so, will remain accessible later on ; and
- consultation of the Administrator and Content Managers.

4. RIGHTS OF THE REPORTING PERSONS

Employees who discover an abuse should try to address and clarify this primarily through the direct hierarchy. If it is not possible to resolve the abuse in such a way or if they prefer to remain anonymous, employees should report this to the Tell-Us-System.

Furthermore, the Swiss TPH has set up persons of trust who offer employees of the Swiss TPH confidential support in self-help and, if necessary, help them to find other contact persons or points of contact. The aim is to support those affected so that they can cope with the situations they experience as stressful or harassing on their own or with the help of the relevant contact points. The information and contact details of the persons of trust can be found on the intranet in the Human Resources section [Persons of trust at Swiss TPH](#).

If it is not possible to eradicate the abuse in one of these ways, Employees are entitled to report abuses to the cantonal ombudsperson. (<https://www.ombudsstelle.bs.ch/>). The removal of the abuse must be in the public interest and must not serve to gain personal advantage. Only reports made in good faith are permissible, i.e. employees making the report may assume from an objective point of view that a violation actually exists. Permitted reports do not violate the duty of confidentiality pursuant to Art. 2.4 of these provisions.

4.1 Assurance of no disadvantages

Employees may not be disadvantaged in the employment relationship on the basis of permissible reports. Disadvantages include, in particular, dismissal, disregard in terms of the career hierarchy and all other career-related obstructions as well as deliberate derogations of a psychological nature and their tolerance. Anyone who is nevertheless affected by a disadvantage due to a permissible report may appeal to higher authorities.

4.2 Respect of the data privacy

As mentioned in the paragraph 2.3.1 [Data protection & data security](#), according to the contract and the “Data Processing Exhibit for EQS Cloud Services”, EQS Group is responsible for ensuring the security of the platform and of the data that transit through it. (Duties of EQS, §3.7).

They will particularly ensure the confidentiality, availability and the integrity of the data.

Moreover, as stated in the IT regulation “Terms of use of the intranet, internet and email”, the user may require the Swiss TPH to disclose whether data about them are being processed at any time.

Personal data may not be disclosed to unauthorised third parties without the consent of the person(s) concerned or other reasonable justification. With respect to data confidentiality, the colleagues of the person concerned are deemed third parties.

4.3 Right to Anonymity

The Reporting Person can decide to remain anonymous during the entire process, from the report submission, until the closing of the case. The anonymity is ensured by the EQS Integrity Line system that allows the Reporting Person to exchange with the Case Manager without revealing his /her identity.

The Reporting Person can decide to reveal his/her identity to the Case Manager, but the Case Manager can not communicate it further, to the End Reporting Manager for instance, without the prior consent of the Reporting Person.

4.4 Right of Information

The Reporting Person has the right to be informed on the case and the decisions that have been taken:

- the Reporting Person receives a first answer from the Case Manager within ten (10) days after reception of the Report ; and
- the Reporting Person must be informed within three (3) months of the status of the internal investigation and its outcome and of any action taken.

4.5 Right of Withdrawal

At any time, the Reporting Person can withdraw his/her report by informing the respective Case Manager through the platform. However, the Case Manager will always investigate the incident in order to make sure that the withdrawal is not due to external pressure put on the Reporting Person.

4.6 Physical and psychological protection

The Reporting Person is entitled to a physical and psychological protection that can be granted by the Institute if needed.

Moreover, in case the psychological or the physical integrity of the Reporting Person is directly endangered, the Crisis Management Team (“CMT”) is immediately involved (See paragraph 2.2.2. [Duty of protection of the Reporting Persons](#)).

For more information regarding the Emergency and Crisis Contingency Plan, please refer to the dedicated intranet webpage: [Emergency Organization](#)

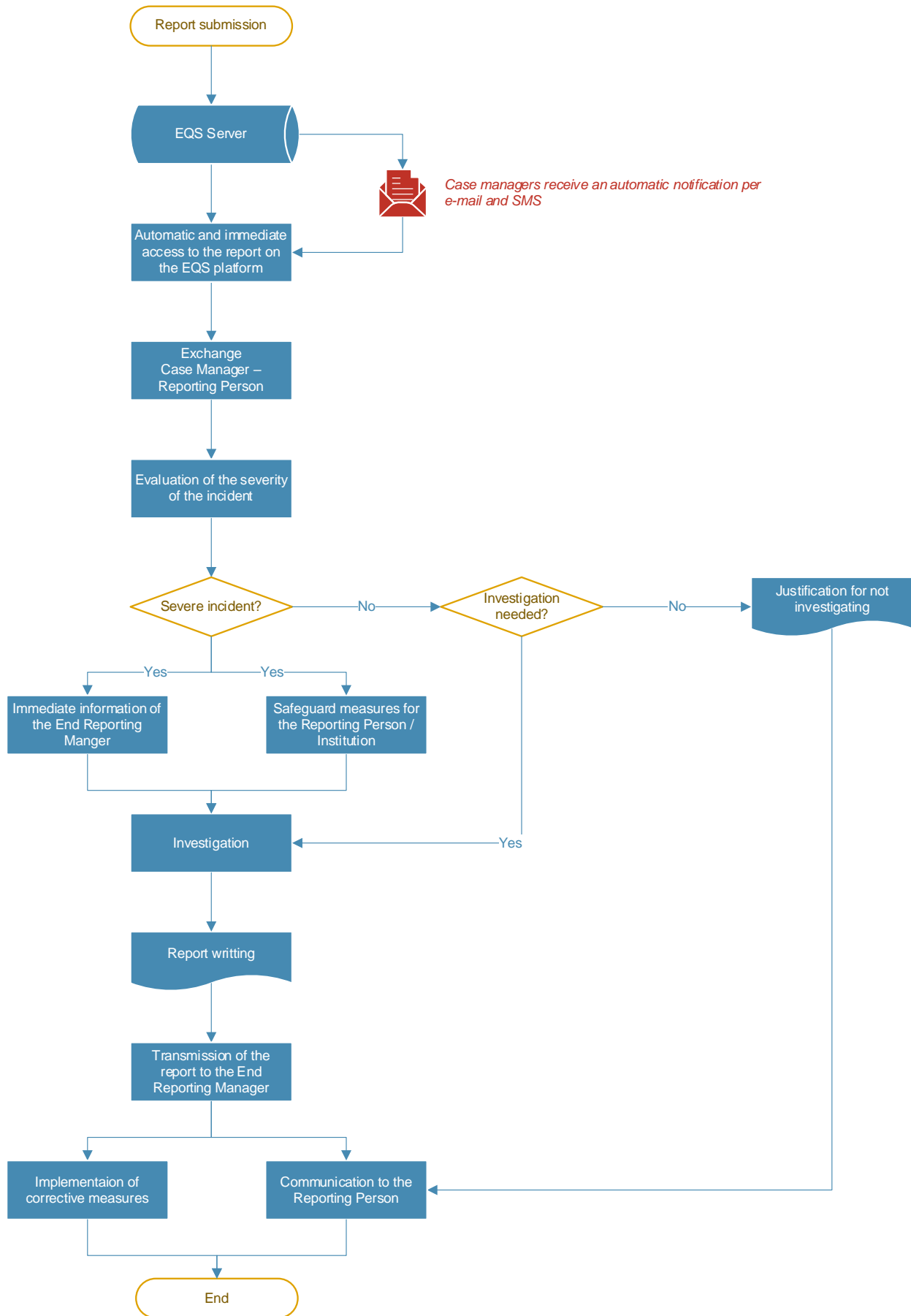
5. SANCTION IN CASE OF MISUSE

Swiss TPH may issue sanctions under labour law such as admonition, warning or termination (possibly without notice) against the offending user in the case of proven misuse of the Tell-Us System or of any confidential information coming from it.

The Directorate (ILK) is responsible for issuing sanctions.

In case of violations of regulatory provisions or legal requirements, Swiss TPH reserves the right to take further legal action against the offending persons.

Appendix A: Case management process



Appendix B: Case reporting flow

