Disclosure Process Guide

This guide will walk you through the process of managing a disclosure from the disclosure being submitted, accessing the disclosure, reviewing it, collaborating with your team, and finally closing the disclosure.

As you review the guide, look for prompts in **bolded pink font** to help customize this guide for your organization. You can remove the prompts if they aren't needed for your org.

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Definitions

Below are some definitions to help you understand important language and sections within a disclosure.

- **Disclosing Party**: The person who submits a disclosure
- **Disclosure**: A survey requested by the organization or submitted by an employee to report possible conflicts of interest related to employment.
- **Proxy**: A method of intake in which a person submits a disclosure on behalf of someone else.
- **Status**: The current status of the Disclosure (Pending, In Review, Cleared, or Rejected)
  - *Pending*: A disclosure has been submitted but has not yet been viewed by a team member.
  - *In Review*: A team member has begun reviewing the details of the disclosure.
  - *Cleared*: The disclosure has been reviewed and determined to either not be a conflict, is approved, or is being managed with a set of conditions.
  - *Rejected*: The disclosure has been reviewed and is determined to be a conflict of interest or the disclosure is not approved (i.e., the employee cannot give/receive a gift).

- **Tasks:** A disclosure-related activity that can be assigned to disclosure managers or by a team member with access to the Disclosure. The Disclosure Manager or team member can create the task for themselves or a team member with access to complete it. Tasks are only viewed by team members with access to the Disclosure, not the Disclosing Party. Tasks can be entered/assigned even after a Disclosure is closed.
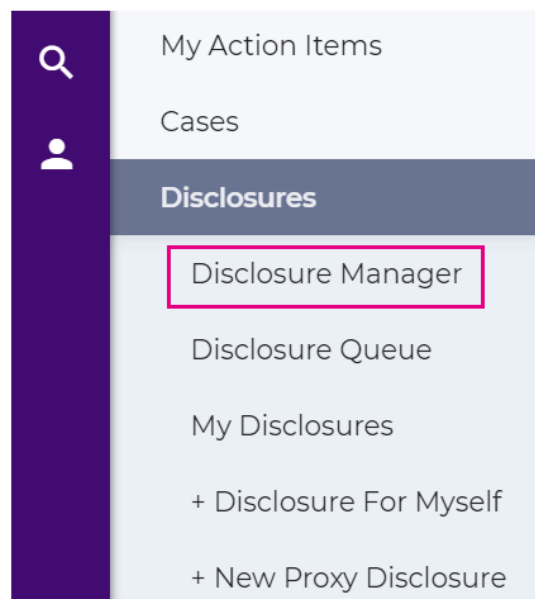
Accessing Disclosures

The Disclosure Managers configured to be notified will receive an email once a disclosure has been submitted. A link to the disclosure will be embedded in the email.

Click the link in the email. This will take you directly to the disclosure to be reviewed. You can also log into Convercent to access the disclosure.

Once logged into Convercent, go to the left-hand navigation menu.

Click *Disclosures* and select **Disclosure Manager** from the list.

Disclosure Manager provides a tabular view of disclosures and allows you to see the disclosure details at a high-level. The view defaults to showing the most recently submitted disclosures with a status of "Pending".

Reviewing Disclosures

To view a disclosure, click the disclosure number in the **Disclosure Id** column. The **Disclosure Details** page will open in a new tab.

At the top of the **Disclosure Details** screen is the **Disclosure Reference Number** (i.e., 0023aa19).

It also includes an employee summary that details the employee's name (employee id), the total number of disclosures the employee has historically submitted, the date this specific disclosure was submitted, and the **Disclosure Type**.

If your organization is sending HR data, this section will also contain other HR-related information about the employee and will link to the **Employee Scorecard**. To access the **Employee Scorecard** and review more details about the employee, click the employee's name. For more information about **Employee Scorecards**, click here. To learn more about configuring **HR Data** to surface, click here.

Review the **Details** tab to see the information that the employee provided related to the specific disclosure. Here you will see the survey questions and responses submitted by the disclosing party.

After accessing the disclosure, change the **Status** from "PENDING" to "IN REVIEW".
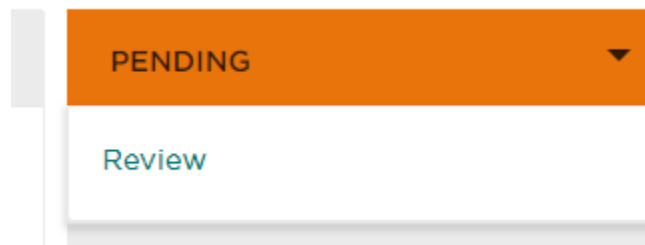
Communicating with the Disclosing Party

If after reviewing the disclosure, more context or information is needed, communicate with the disclosing party via the **Messages** tab. This section is visible to the disclosing party and the Internal Team. Any messages and attachments submitted here will be available to both audiences.
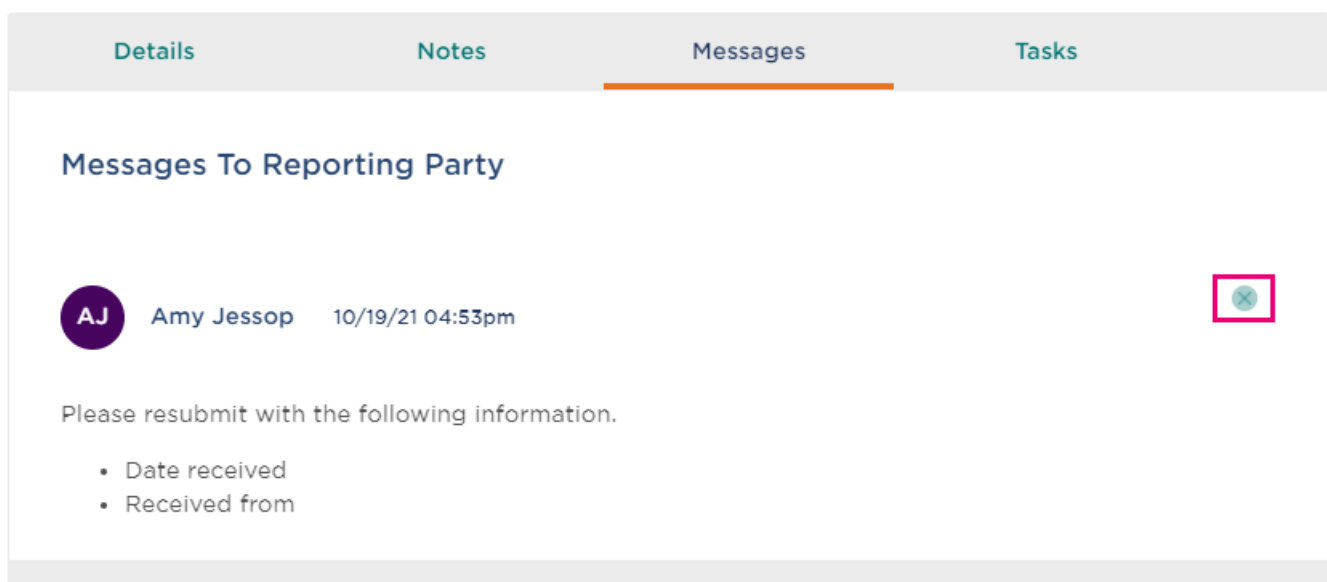
To send a message to the reporting party, click the carrot next to **Select Recipient** and select the **Reporter's** name.

Enter your message and click *SUBMIT*.
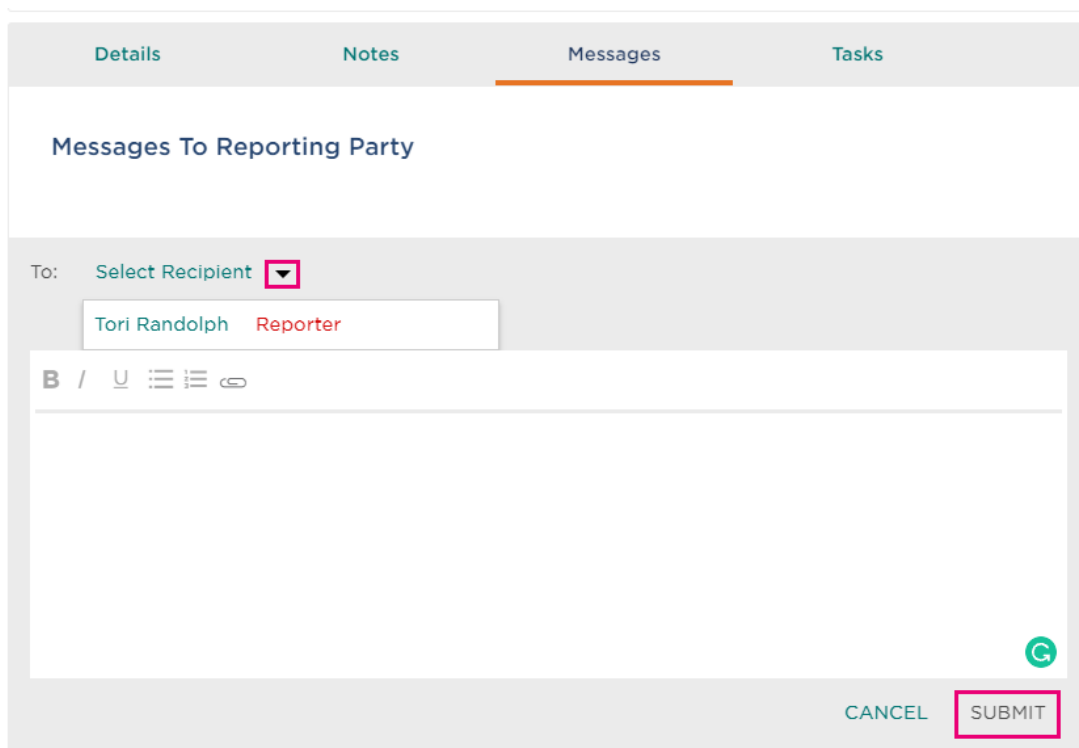
Messages can also be deleted once submitted by clicking the "x" next to the message.

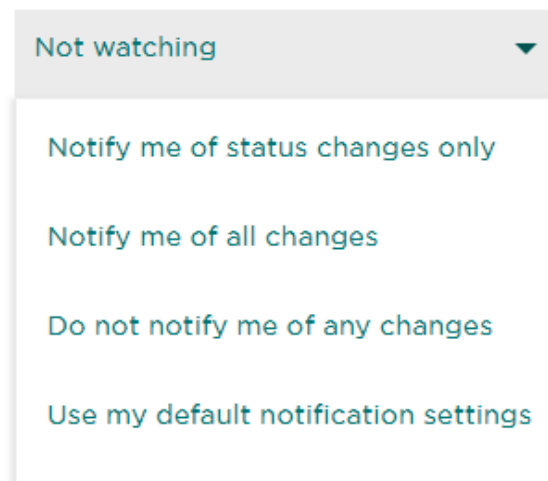- **Note**: Deleting a message is recorded in the audit trail so there is full traceability.

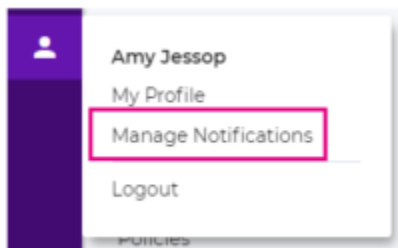## Managing Notification Preferences

While managing a disclosure you may want to receive notifications about changes made to the disclosure. Your default disclosure notification settings will be applied to all disclosures, but you have the option within a disclosure to override your notification preferences.

To update your preferences for a specific disclosure, click the carrot next to **Not Watching** and select your notification preference.

- **Not watching** – You won't receive any notifications about this disclosure.
- **Notify me of status changes only** – You will only receive notifications about this disclosure when the status changes.
- **Notify me of all changes** – You will receive notifications about every update made to the disclosure.
- **Do not notify me of any changes** – You won't receive any notifications about this disclosure.
- **Use my default notification settings** – You will receive notifications based on what you have selected as your default settings under your **Profile** > **Manage Notifications**. For more information on managing your notifications, click here.

Managing Disclosure Access

If additional team member support is needed to manage the disclosure, you can grant them access. You can also deny access to a disclosure for specific employees, if needed.

To manage team access, click the **MORE** drop-down and select **Manage Access** from the list.
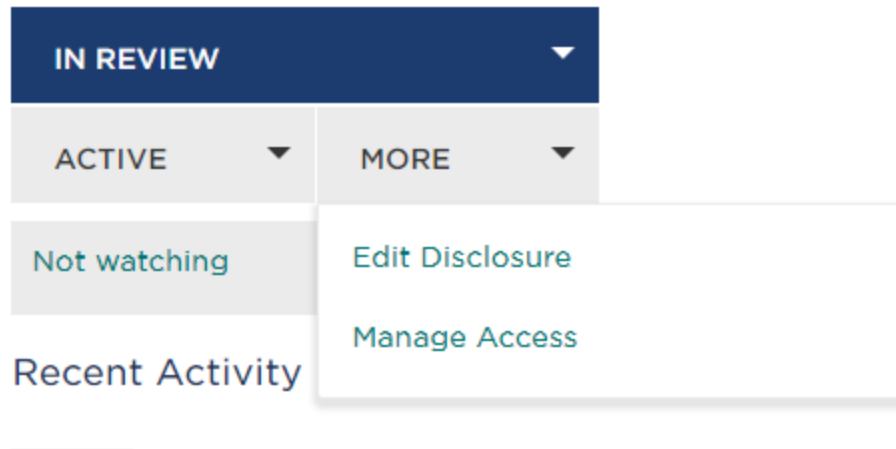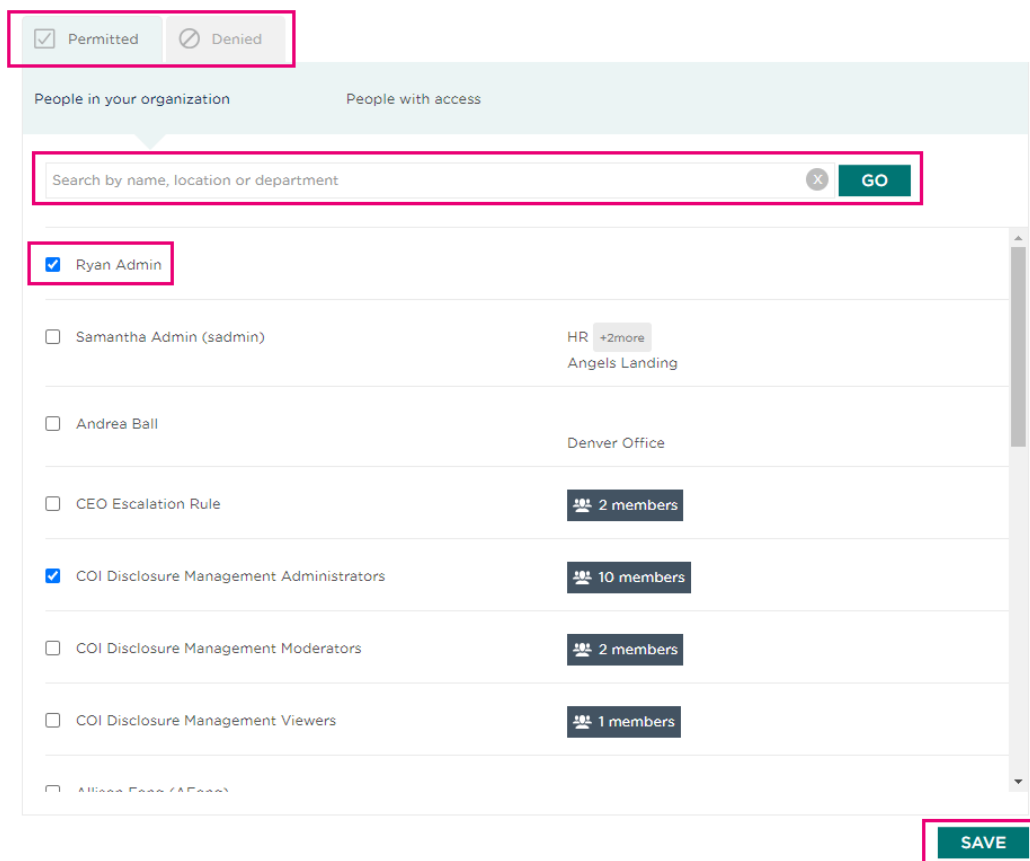
To grant access, select the **Permitted** tab and search for the team member's name.

Check the box next to their name and click *SAVE*.

To remove access, select the **Denied** tab and search for the team member's name.

Check the box next to their name and click *SAVE*.

Communicating and Collaborating with Internal Team Members

If more than one team member has been granted access to a disclosure to support managing it, there are a couple ways to work with them within a disclosure (**Notes** and **Tasks**).

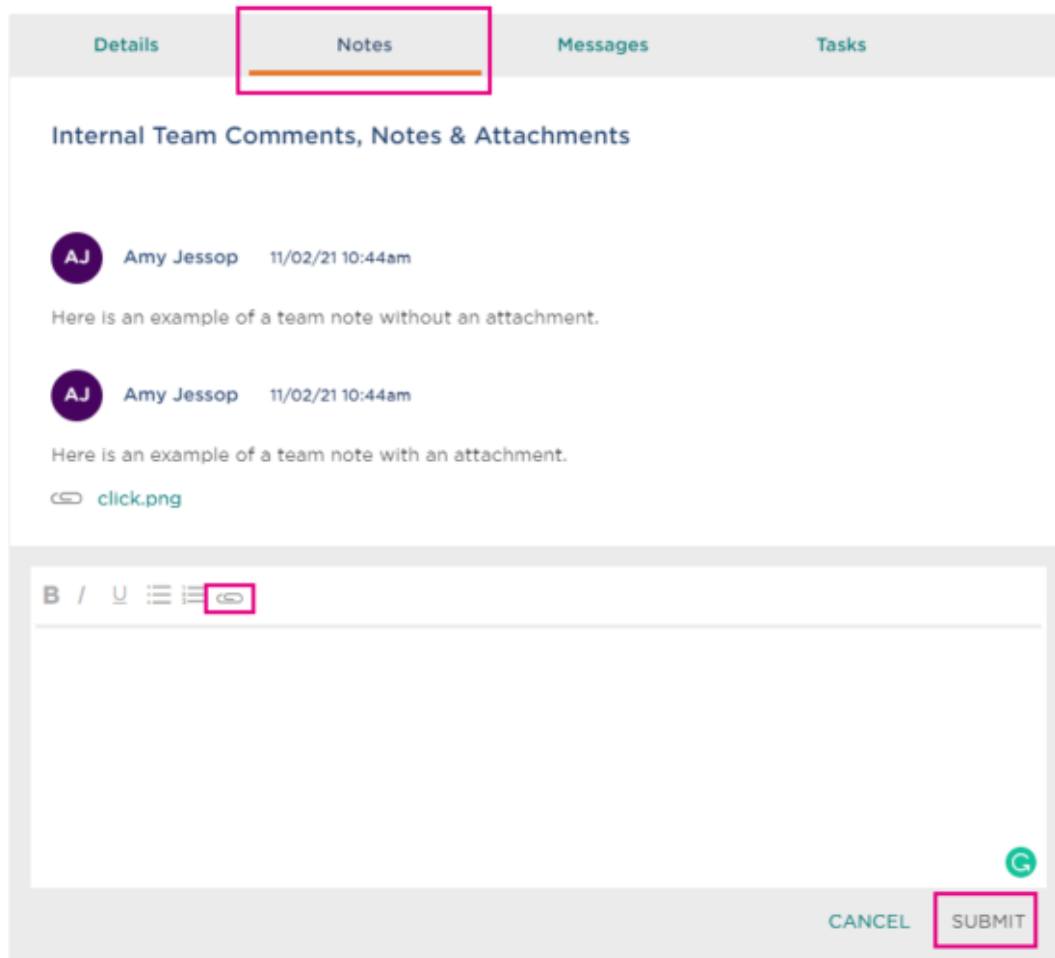**Prompt: Does your organization have thoughts on what should be included in the Notes section?**

Notes

The **Notes** tab is where you can view and exchange notes, comments, and attachments with your **Internal Team**. This section is not accessible to the disclosing party.

To add a note or attachment, click the **Notes** tab and enter your message to the internal team.

If applicable, click the paperclip icon to include an attachment.

Once the message and attachment have been added, click *SUBMIT*.
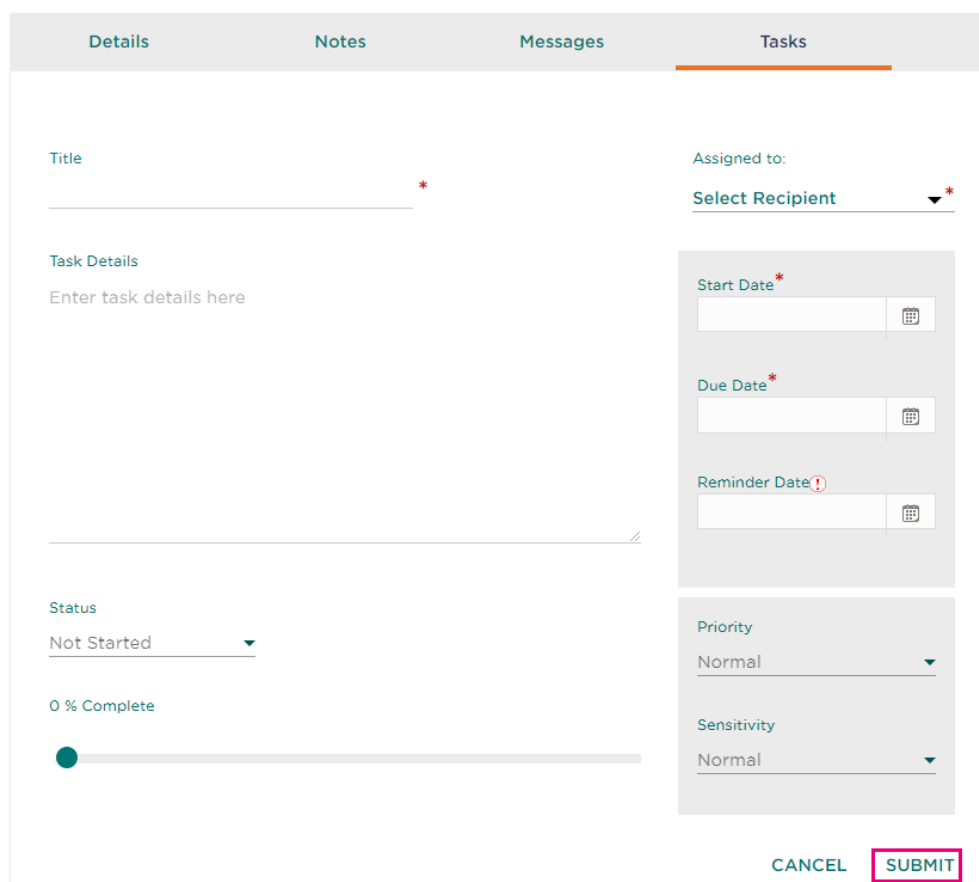

Tasks

Prompt: Does your organization have a plan for using Tasks?

The **Tasks** tab is for the internal team. Tasks are optional but recommended. Here you can create, assign, and view tasks related to the disclosure. Tasks can be reminders for action, requests for follow-up, reminders to post updates, etc. You can create tasks for yourself or other team members. If you are assigned a task, you will receive an email notifying you of the assignment. Tasks continue to operate even after a disclosure is cleared/rejected.

To create a new task click *ADD NEW*.

Enter the required information (fields with an asterisk) and if desired, add any additional information in the optional fields.

Click *SUBMIT*.

Once you submit the task, it will display on the **Tasks** tab.

You can view all tasks by their status. Click the status options across the top of the **Tasks** tab to view the tasks within each status:

- ALL
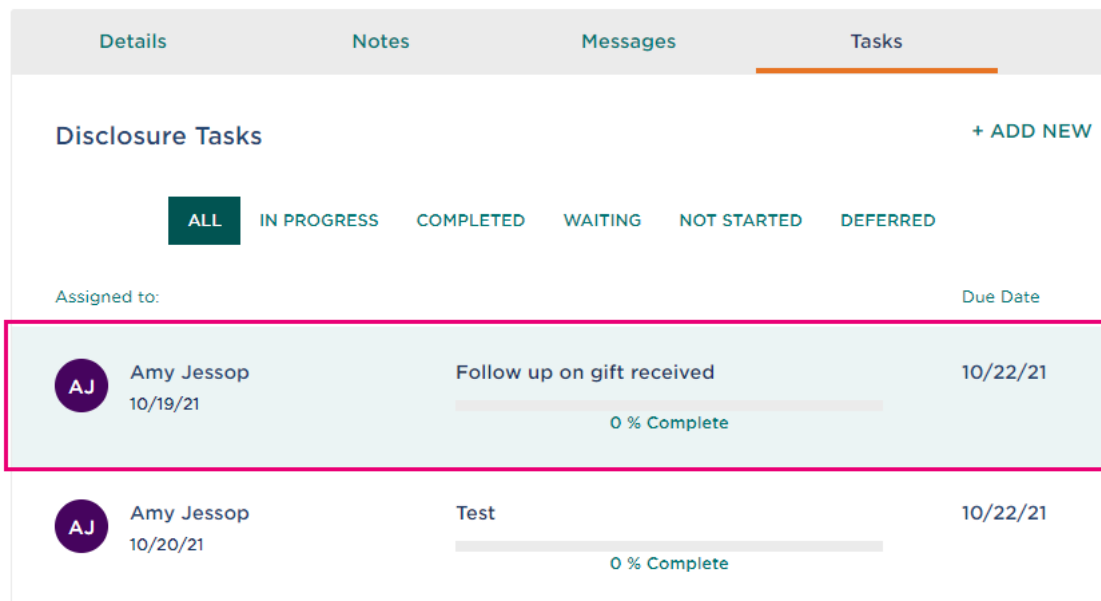- IN PROGRESS
- COMPLETED
- WAITING
- NOT STARTED

- DEFERRED

To edit a task, click anywhere on the task and it will take you to the edit screen.

Edit the **Task** details as needed and click *SUBMIT* once complete.

Editing a Disclosure

If needed, you can make edits to a disclosure. For example, if more information is provided after reviewing the disclosure in more detail, you can edit survey responses.

To edit the disclosure, click the **MORE** drop-down and select **Edit Disclosure** from the list.
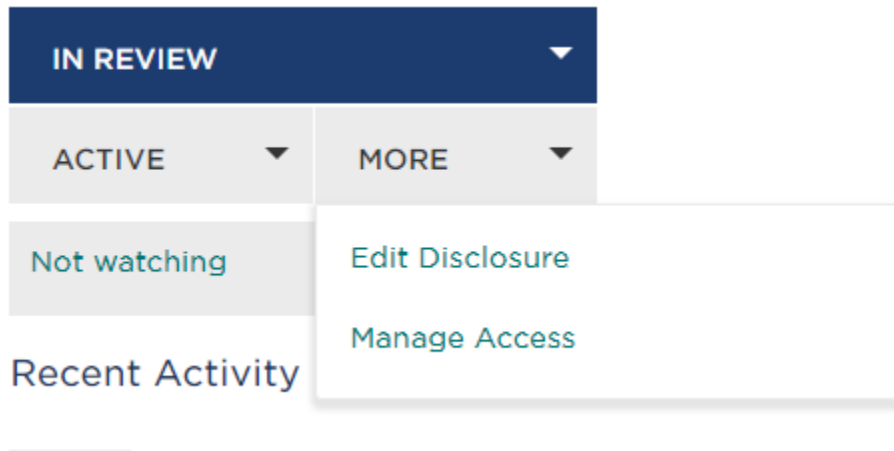
Make the necessary changes to the survey responses.

Once all edits have been made click **SUBMIT** to save changes.

Closing a Disclosure
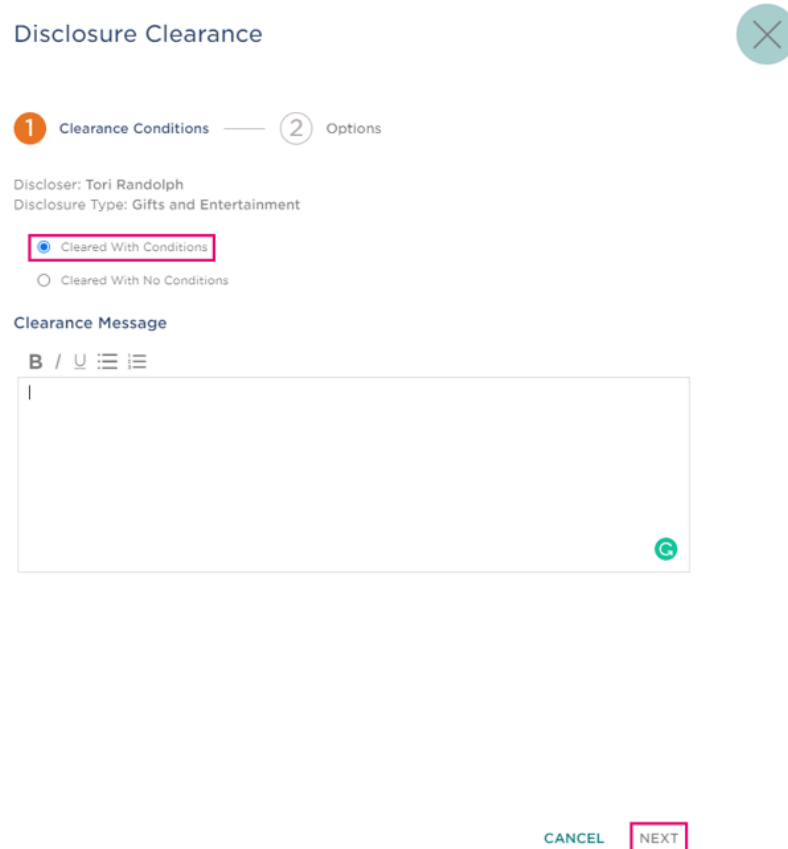
Once disclosure review is complete and a decision has been made about the disclosure, update the status from "IN REVIEW" to one of the following:

Prompt: Review the definitions below to determine what works best for your organization.

- *REJECTED* – Select **Reject Disclosure** when a disclosure is determined to be a conflict of interest and the employee cannot engage in the described behavior/relationship.
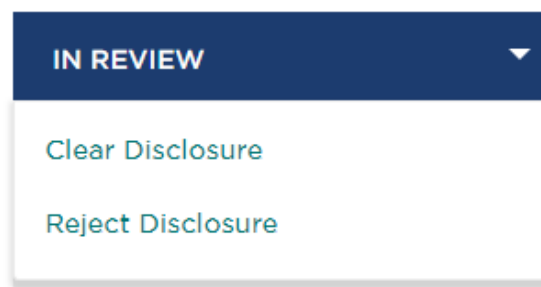   - If the disclosure is rejected, it is best practice to send a note to the discloser as this option will not send anything to the employee by default.
- *CLEARED* – Select **Clear Disclosure** when a disclosure is determined not to be a conflict of interest, the behavior is approved, or the disclosing behavior is approved with conditions.

- o **Cleared With Conditions**: Use this option when the disclosure is approved but conditions apply to the approval.
    1. Select **Cleared With Conditions**.
    2. In the **Clearance Message** enter a detailed explanation of the action the company and/or employee must take, outlining the threshold or boundary of the conditions.
    3. Click *NEXT*.

    4. If attestation is required by your org, on the **Disclosure Clearance** > **2 Options** screen, select **Require discloser to attest to clearance conditions**. This will send a notification to the disclosing party requiring them to review and attest to the conditions provided.
    5. On the new screen click *SUBMIT*. The disclosing party will be notified that their disclosure has been cleared.
- o **Cleared With No Conditions**: Use this option when the disclosure does not pose any risk to the organization.
    1. Select **Cleared With No Conditions**.
    2. If desired, enter a message in the **Clearance Message** box.
    3. Click *NEXT*.
    4. On the **Disclosure Clearance** > **2 Options** screen, select **Notify discloser of clearance by email**. This will send a notification to the disclosing party.
    5. On the new screen click *SUBMIT*. The disclosure has now been **Cleared**.

Navigating Disclosures

When logged in to Convercent, selecting **Disclosures** provides you the following options:

- **Disclosure Manager** – Select **Disclosure Manager** to review the disclosures you have access to and view in a tabular format. (used more than Disclosure Queue)
- **Disclosure Queue** – Select **Disclosure Queue** to review the disclosures you have access to and by employee.
- **My Disclosures** – Select **My Disclosures** to view your personal disclosures (forms you have submitted).
- **+ Disclosures For Myself** – Select **Disclosures For Myself** to submit a new personal disclosure.
- **+ New Proxy Disclosures** – Select **New Proxy Disclosures** to submit a new disclosure on behalf of another party.

Note: Employees without access to review disclosures will only see **My Disclosures** and **+ Disclosures For Myself** when clicking the **Disclosures** option in the navigation menu.

Disclosure Manager provides a tabular view of disclosures and allows you to see details at a high-level. The view defaults to showing the most recently submitted disclosures with a status of "Pending".

Modifying Views in Disclosure Manager

The **COLUMNS** widget allows you to modify the view by selecting the columns you want displayed and the order in which they are visible.

To modify the view, click *COLUMNS*.

Select which columns you want in the view by checking the box next to the **Column Name**.

To change the order in which the columns are displayed, select the column, and drag it to the desired location (moving up or down).

Once the columns are in the desired order, click *DONE*.
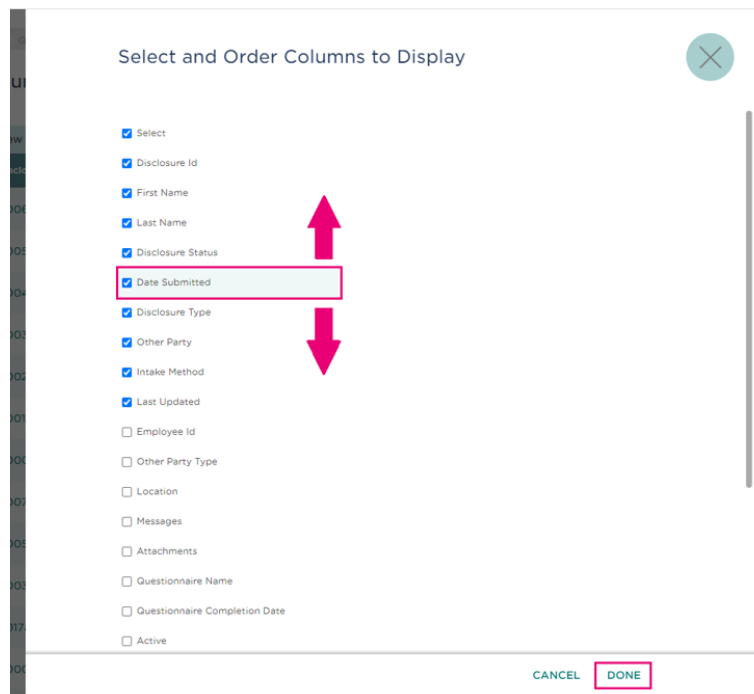
The data in the **Disclosure Manager** may be sorted and filtered by any column. Columns can be sorted by ascending or descending order, or you can filter the columns.

To sort a column, click the vertical ellipsis next to the column name and select your desired sorting option.

Multiple views can be saved in **Disclosure Manager**.

To save a view, click the Save icon.

Select **New View**, create a custom name and click **SAVE**.
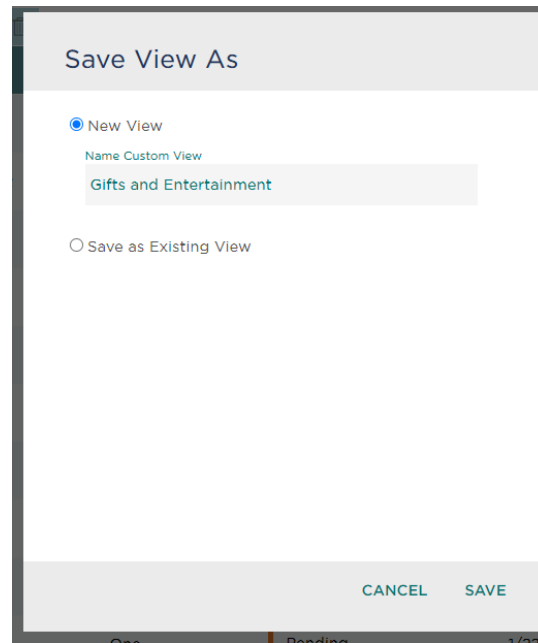
Using Disclosure Queue

Disclosure Queue provides you a view of all disclosures submitted by a specific employee. It also allows you to search for an employee by **First name**, **Last name**, **Employee Id**, **Location Id**, and **Location Name**.
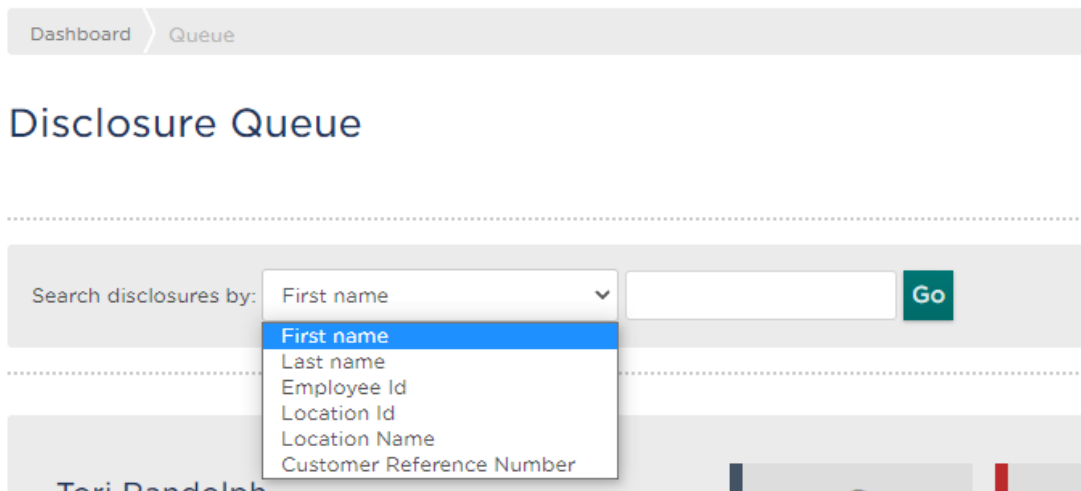
Click any of the statuses next to a specific employee to display the disclosure type. From there you can open the specific disclosure details by clicking the disclosure hyperlink.

Statuses

Disclosure Status

Within the disclosure, the panel on the right-side of the **Disclosure Details** screen allows you to update the status and mark the disclosure as active/inactive.

- *PENDING*: A disclosure has been submitted but has not yet been viewed by a team member.
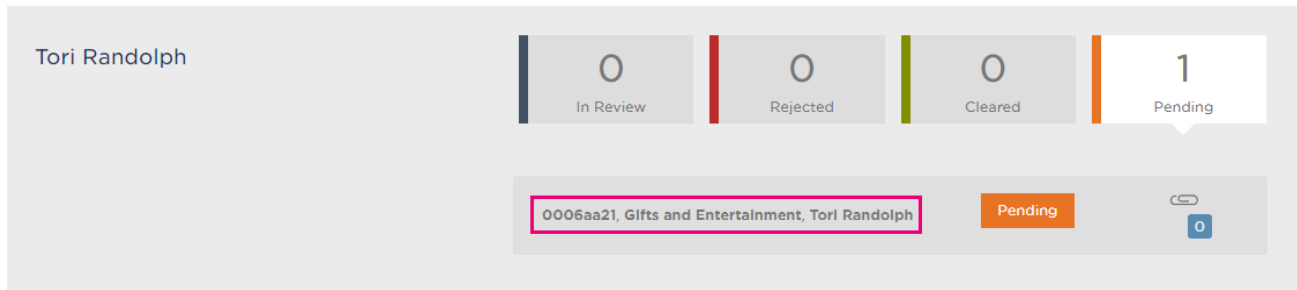- *IN REVIEW*: A team member has begun reviewing the details of the disclosure.
- *CLEARED*: The disclosure has been reviewed and determined to either not be a conflict, is approved, or is being managed with a set of conditions.
- *REJECTED*: The disclosure has been reviewed and is determined to be a conflict of interest or the disclosure is not approved (i.e., the employee cannot give/receive a gift).

Active/Inactive

All disclosures default to **ACTIVE**. If a disclosure is no longer relevant it should be updated to **INACTIVE**. Click the drop-down and select **Make inactive**.
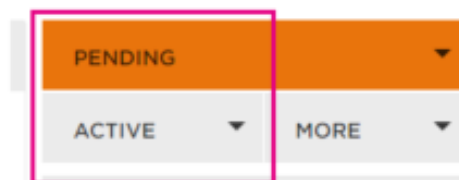
Recent Activity

This section provides a full audit trail detailing who has accessed the disclosure and any updates or edits that were made. Click *See All Activity* to see the full list of activity on the disclosure.

Recent Activity

20 OCT	Disclosure Viewed
	by Amy Jessop
	today 12:38 PM

20 OCT	Disclosure Status Changed: Previous: Pending; Current: In Review
	by Amy Jessop
	today 12:38 PM

20 OCT	Task Information Changed: Percent Complete (Previous: 0.00%; Current: 20.00%)
	by Amy Jessop
	today 12:30 PM

20 OCT	Task Status Changed: Previous: NotStarted; Current: InProgress
	by Amy Jessop
	today 12:30 PM

20 OCT	Disclosure Viewed
	by Amy Jessop
	today 12:24 PM

See All Activity