

MITRATECH | GRC Solutions

2026 State of Ethics Hotlines Report

Whistleblowing and Hotline Program
Benchmarking Data and Insights

EMPOWER. AUTOMATE. ELEVATE.



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EXECUTIVE SUMMARY

A Letter from Laura Jacobus
EVP Strategic Advisory
Services, Mitratach

To our clients, colleagues, and fellow compliance leaders,

While much of the world was silent for many decades on the topic of hotline (or “whistleblower”) reporting, there has been a gradual shift in global regulatory focus, a heightened degree of social unrest, and a greater expectation of physical and psychological safety in the workplace. All of these changes have led an amplified focus on hotline reporting – and more importantly, what we can learn from the reporting data.

Once thought of as only a check-the-box, foundational element of any compliance program, hotlines are now essential to any enterprise risk infrastructure.

As organizations work to ensure compliance with complex and sometimes competing hotline requirements, changes and pressures related to societal values now demand a fresh look at organizational culture. Does your culture support your values, and will those both lead to employees actually speaking up?

Our goal in this report is to provide practical insights. We first examine the data, and then we explore some of the topics that come up in daily conversations with compliance, risk, legal, and HR teams.

I welcome your thoughts and look forward to continuing the conversation.

Sincerely,

A handwritten signature in white ink that reads "Laura Jacobus". The signature is written in a cursive, elegant style.

Laura Jacobus

EVP Strategic Advisory Services, Mitratach

Introduction

This year's 2026 State of Ethics Hotlines Report analyzes 49,189 hotline reports submitted in 2025, across organizations of all sizes, industries, and countries. It reveals that hotlines remain an effective channel for surfacing serious misconduct.

Our analysis last year highlighted a sharp rise in total reports, with downward trends in harassment and workplace violence. This year's data tells a different story: our data shows that volume stabilized, while the mix of issues raised in the reports shifted significantly.

The data underscores a critical message for leaders: culture, values, and processes must adapt as employee and stakeholder concerns evolve. Reporting channels provide an essential entry point into a broader, ongoing change management effort with strategic implications that extend well beyond the traditional role of hotline programs.



Data Insights

1. Reporting Volume Stabilizes

Insight: While hotline report volume remained surprisingly stable in 2025, overall hotline engagement has increased by more than 80% over the past four years.

What This Means: Increased engagement likely means employees consistently use hotlines. Reporting volume, however, is an inherently ambiguous metric. Low report volume can mean a healthy, low-risk environment; a low-trust environment where people do not feel safe reporting; or high-loyalty employees who don't want to speak up.

To understand what volume is really telling you, continual cultural evaluation is critical. Leaders should interpret their report counts in context alongside indicators of trust, awareness, risk exposure, and cultural norms. It is important not to treat more reports as automatically bad or fewer reports as automatically good.

For example, low reporting volume may be a positive signal when you also see:

- High awareness of reporting options (training completions, internal communications reach)
- Strong response metrics (low time to acknowledge, triage, and close tickets; low backlog)
- Consistent, credible report handling (high-quality documentation, escalation discipline, and adherence to policy and processes)
- Low retaliation concerns and high confidence in leadership (from survey and other engagement data)

On the other hand, low volume is more concerning when it coincides with:

- Disturbing objective risk measures, such as high employee turnover, increased safety incidents, or audit findings
- High fear-of-retaliation sentiment or low trust in HR or compliance
- A narrow category of reports (e.g., almost no conduct or safety reporting) at odds with your organization's risk profile
- Evidence of concerns surfacing elsewhere (e.g., in exit interviews, manager escalations, reports to external counsel or regulators)

Likewise, a spike in tips can reflect rising risk or growing confidence in the system.

2. Workplace Conduct Dominates

Insight: Workplace Conduct is the largest reporting category, accounting for just over half (50.3%) of all 2025 reports.

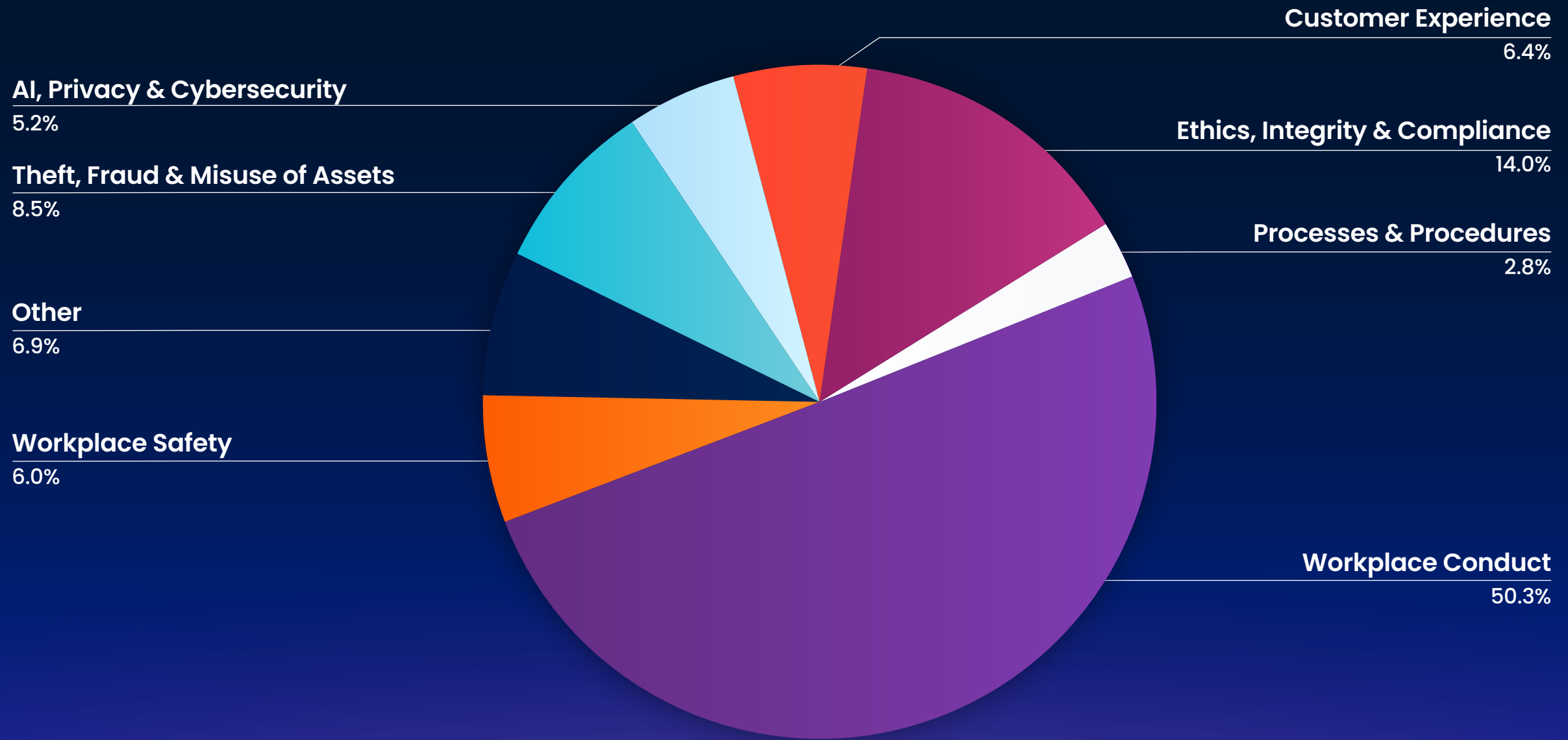
What This Tells Us: Employees view hotlines as a safe place to raise concerns about behavior, fairness, and day-to-day workplace experiences reflective of contemporary and pressing social issues.

Opportunities: An uptick in workplace culture-related concerns offers an opportunity to examine conditions that enable misconduct, including widespread tolerance of inappropriate behavior, inconsistent accountability, and fear of retaliation.

Recommendations:

- Conduct regular simulations with HR and people leaders to test their response to sensitive reports, ensuring the reporter's anonymity and career path are protected throughout the investigation.
- Ensure the hotline remains mobile-accessible and offers multiple intake paths (QR codes, anonymous portals where permitted, third-party apps, access to the C-suite or board members) to meet the expectations of a multi-generational workforce.
- Replace generic compliance videos with interactive, scenario-based training programs that address the actual themes appearing in your data.
- Move messaging away from reporting misconduct and toward protecting our values. Positioning the hotline as a tool for culture preservation, rather than just discipline, encourages employees to flag issues earlier.
- Provide managers with Coaching Toolkits specifically designed to de-escalate interpersonal conflicts before they formalize into a workplace culture report.
- Consider sharing anonymized summaries of reporting outcomes and actions taken with the entire organization to prove that speaking up leads to action.

Incident Report Categories



3. Specific Workplace Conduct Allegations Remain Prevalent

Insight: Reports of harassment, including hostile work environment, account for 28% of workplace conduct reports. Non-harassment discrimination reports accounted for another 4.6%

What This Tells Us: A jump in hostile work environment concerns (from 2% to 18%) suggests that employees are no longer reporting only harassing events, but are instead reporting a wider range of situations. This shift potentially reflects a lower tolerance for workplace misconduct and a heightened expectation of psychological safety in the workplace.

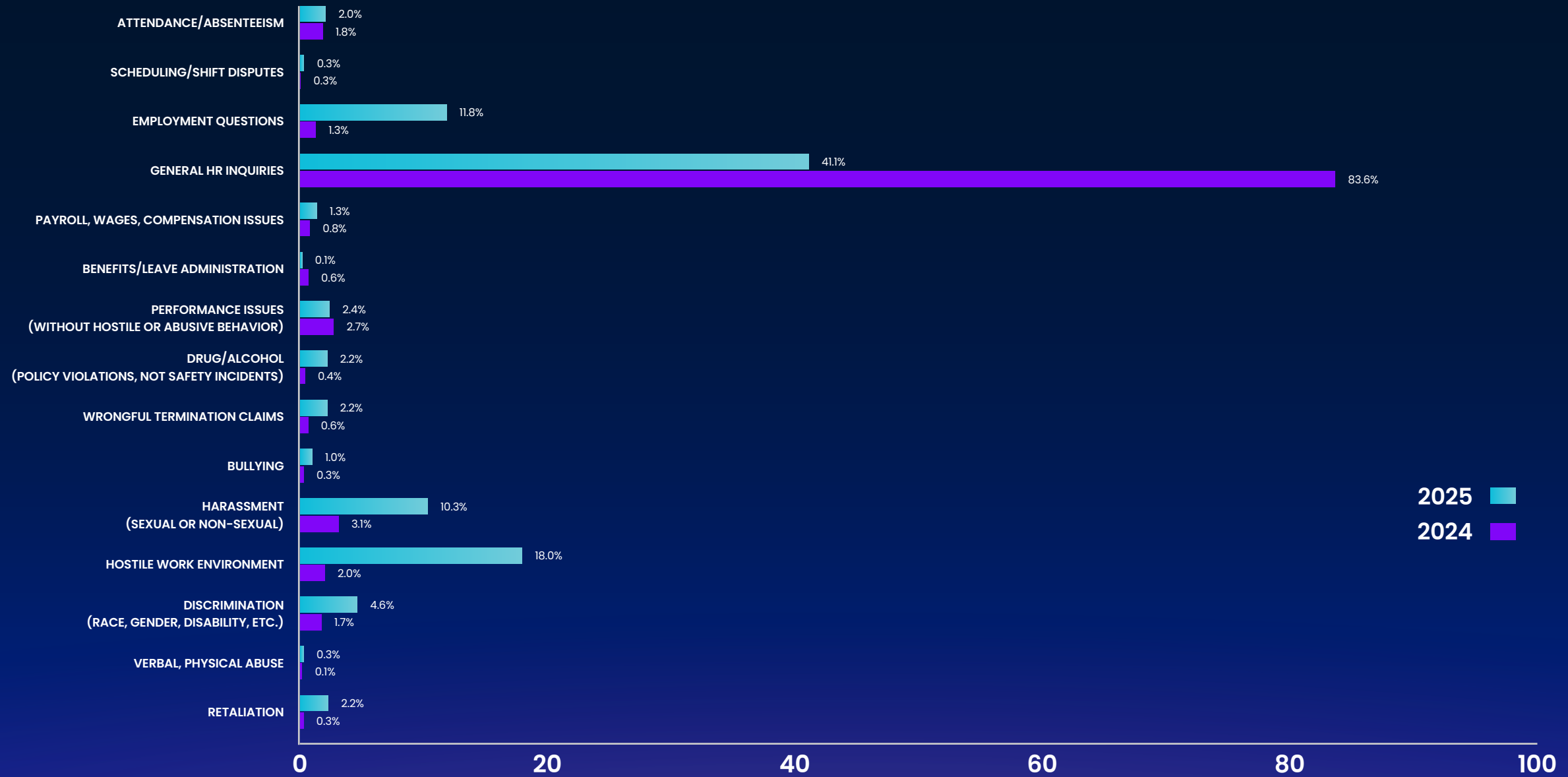
Furthermore, a rise in harassment and discrimination reports from 6% to 15% is particularly notable given the shifting DE&I landscape. It suggests that while corporate DE&I programs may be in flux and facing external scrutiny, the actual employee experiences that led these programs to proliferate still demand internal attention.

Opportunities: The concentration of specific allegations in the data provides a roadmap for targeted intervention. These insights are a signal of strained working conditions. Organizations have an opportunity to move away from good enough compliance training to higher-quality programs that can help repair culture, as well as focus on manager-focused solutions.

Recommendations:

- Take a careful look at areas within your organization with high Hostile Work Environment reporting.
- Beyond tracking only report volume, use reporting data to identify if specific locations or functions (e.g., specific worksites or teams) have higher-than-average conduct reports.
- Monitor the substantiation rate (how many reports are proven true) to determine if high volume reflects a toxic environment (high substantiation) or a lack of policy clarity (low substantiation).
- Be sure your harassment and discrimination prevention training addresses modern workplace issues that are relevant to your workforce.
- Equip managers with de-escalation and inclusive leadership toolkits to proactively address potential problems.

YoY Workplace Conduct Reports



4. HR Guidance Inquiries Predominate

Within the Workplace Conduct category of concerns, the most common report themes include HR guidance inquiries.

Insight: General Human Resources inquiries represent 41% of Workplace Conduct reports. These reports can serve as early warning signals, in which employees seek clarification on rules or norms before filing formal complaints.

What This Tells Us: Employees are not only using the hotline to report serious problems; they are also using it as a tool to navigate HR issues. Forty-one percent (41%) general inquiries, which suggests a widespread gap in employee understanding of HR rules and norms. Employees are seeking transparency in – and clarification of – HR processes, indicating that current handbooks and other internal values- and culture-related communications may not be meeting the needs of the modern workforce.

This high volume of reporting also suggests that hotlines are viewed as trusted resources for guidance, indicating healthy, proactive reporting cultures in which employees feel comfortable asking questions before issues escalate.

Program Opportunity: This data presents an opportunity to increase how often employers communicate about their HR processes and values, and potentially identify new or varied communication methods.

Employee and manager training, regular presentations and webinars, FAQs, and even more creative communication methods may help keep employees educated about HR processes, increase comfort with HR engagement, and even positively boost overall culture.

Leadership and Training Matter: Strong reporting cultures require an appropriate tone at the top and visible [support from senior leaders](#). Additionally, organizations must offer training that is relevant, engaging, and demonstrates a genuine commitment to surfacing and addressing concerns while prohibiting retaliation.

Why this Matters: These question- and clarification-driven reports often surface before issues escalate into formal complaints, litigation, or attrition. Organizations that respond promptly and consistently can reduce downstream risk while improving trust in the reporting process.



HOTLINE IMPLEMENTATION TIP

Organizations that lack clear intake and distribution paths for HR-related hotline reports risk negatively affecting initial responsiveness and the timeliness of higher-risk investigations.

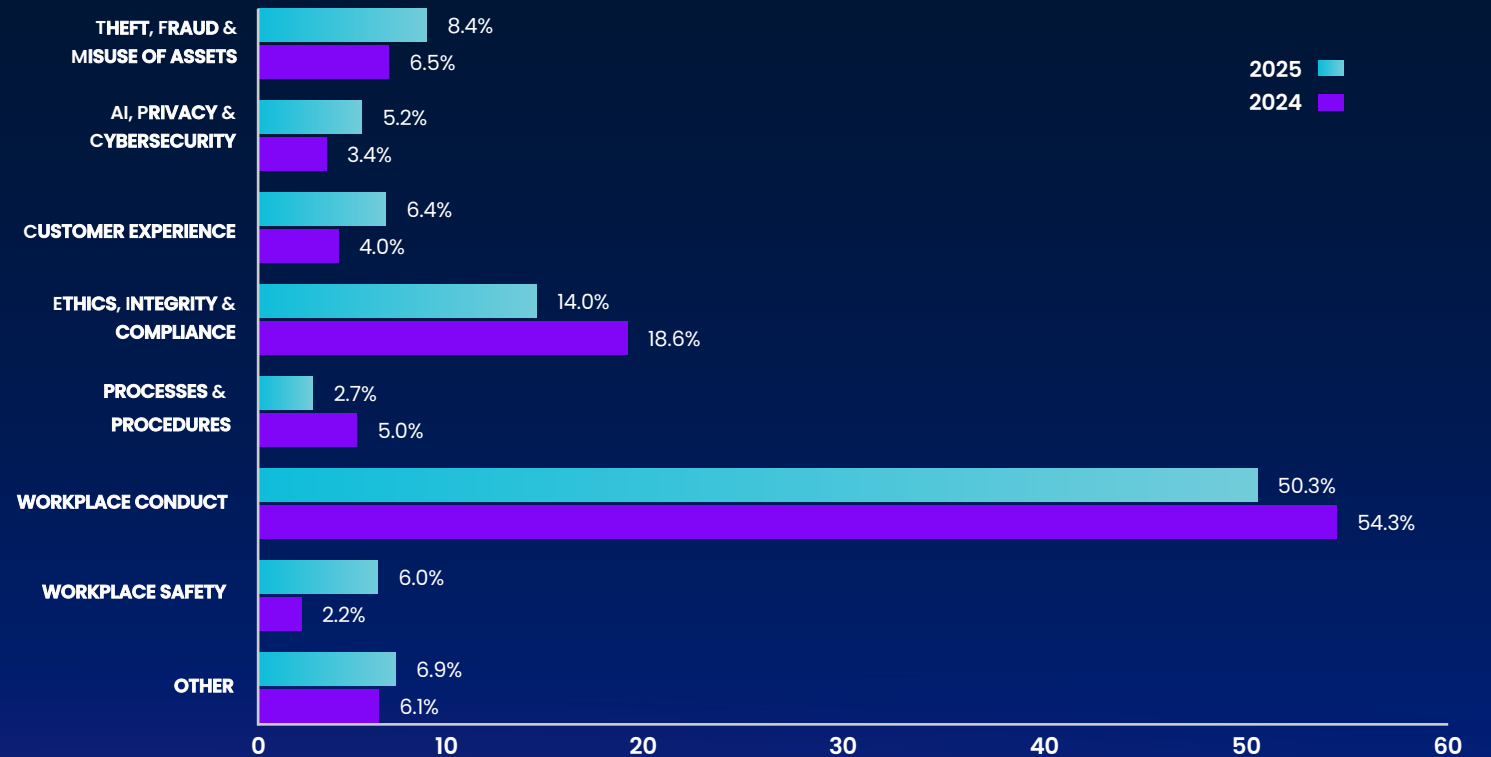
5. Workplace Safety Reports Are Rising

Insights:

- Workplace safety reports make up 6% of the total volume of reports but show the largest year-over-year increase (+64%).
- Nearly 70% of workplace safety reports relate to unsafe environments or conditions.
- Workplace violence reports comprise slightly less of the total amount of workplace safety reports, from 12.3% in 2024 to 10.1% in 2025.
- From 2024 to 2025, reports of threats and intimidation have grown from 2.8% to 7.7%.

What This Tells Us: This growth could represent an increased awareness of potentially violent situations following the enactment of new workplace violence prevention laws in CA, NY, and elsewhere.

YoY Incident Reports



Society Reflected in Organizational Culture:

The overall increase in workplace safety reporting, combined with the predominance of reports relating to unsafe conditions, suggests that employees are more often using hotline channels to flag hazards before harm occurs. This pattern is particularly notable for the threats and intimidation category. The overall increase in workplace safety concerns may reflect employees' desire to feel safe in an increasingly conflicted world.

California SB 553 and New York Retail Worker Safety Act

Two recent laws mandate employer transparency and reporting procedures for workplace violence. These laws have lowered barriers for employees to speak up about violent threats:

- [California SB 553 \(Effective July 1, 2024\)](#) requires employers to implement a written prevention plan that includes specific procedures for accepting and responding to reports of workplace violence while strictly prohibiting retaliation. Furthermore, employers are now legally required to maintain a Violent Incident Log and provide annual training on how to report such concerns.
- [New York Retail Worker Safety Act \(Effective 2025\)](#) requires retail employers to adopt a formal workplace violence prevention policy that identifies a specific contact for incident reports. It also mandates regular interactive training on how to report concerns.

These laws require evidence of a reporting process. An ethics hotline can serve as an effective channel, along with other methodologies, for addressing these requirements.

Call to Action:

Broadened safety definitions that encompass physical, psychological, and digital well-being are needed as organizations work to address external and technology-related pressures.

Leading Practice:

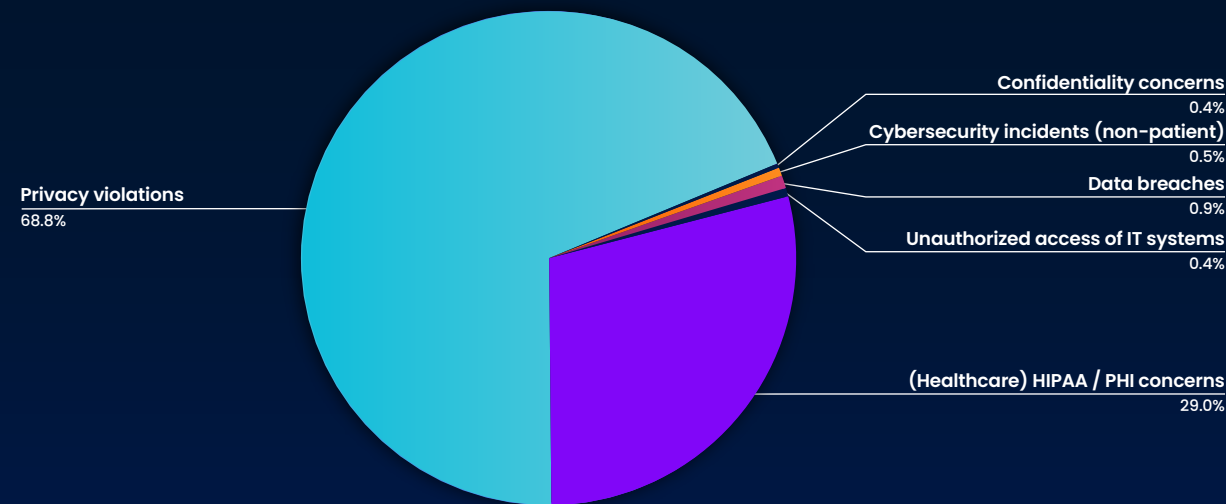
When organizations acknowledge safety reports swiftly and take clear, prompt action, they build confidence in the hotline process, increasing the likelihood that employees will report hazards and other concerns early.

6. Privacy Concerns are on the Rise.

Insight: Reports in our AI, Privacy, and Cybersecurity category increased 34% year over year. Sixty-nine percent (69%) of reports involve privacy violations, whereas confirmed breaches represent fewer than 2% of reports. While these reports often route through IT or Information Security channels, hotlines play a crucial role in surfacing privacy violations, inappropriate access, and data misuse or mishandling, especially in regulated environments where policy compliance is as critical as technical controls.

Connected Concept: Organizations are increasingly formalizing AI governance in response to standards such as [ISO/IEC 42001](#), frameworks like the [NIST AI Risk Management Framework](#), and regulatory mandates, including the EU AI Act. As companies operationalize these requirements through stronger [third-party risk management \(TPRM\)](#), enhanced data governance, mandatory employee training, and greater awareness of technology- and data-related obligations, these practices are increasing across the enterprise. This increased awareness may lead to earlier identification of potential policy violations and support a more proactive, risk-aware culture aligned with evolving AI Governance expectations.

AI, Privacy & Cybersecurity Reports



Opportunity Point: Review your organization’s [AI Governance](#), [Disaster Recovery](#), and [Business Continuity](#) processes to ensure they are part of your integrated executive and board reporting.

Implementation Tip: Be sure to share any concerns reported regarding AI, Privacy, and Cybersecurity with the appropriate staff, including members of your AI Governance Committee.

Looking Ahead: Ensuring that your hotline data and program are compliant with privacy, cyber, and AI regulations is more important than ever, as we anticipate an increased likelihood of third-party relationships compounding risk exposure in yet-unwitnessed catastrophic events.

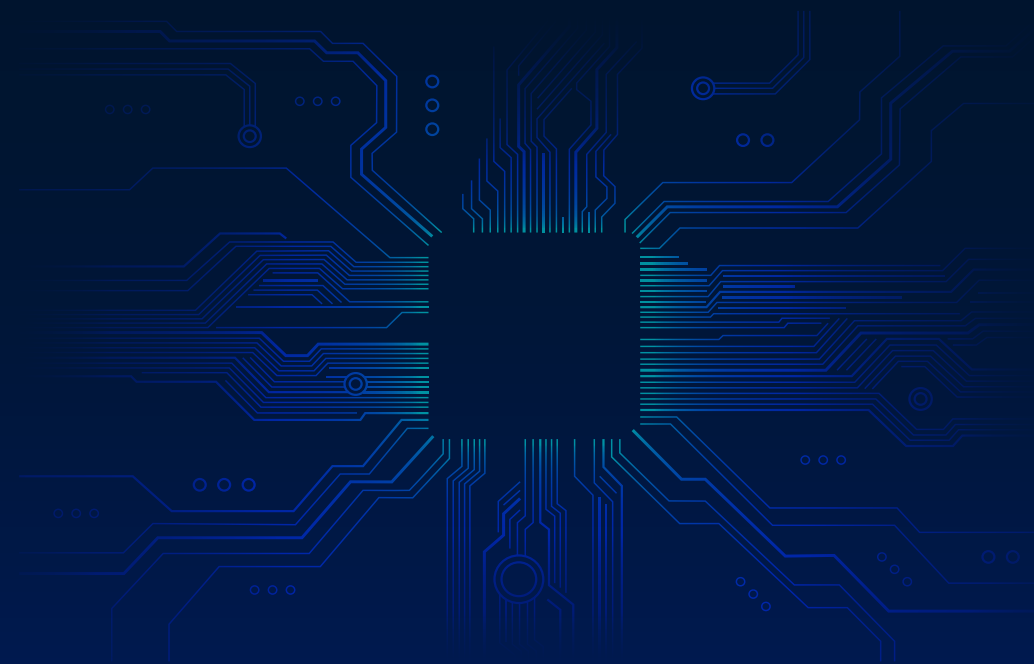
7. Growth in Theft, Fraud, and Misuse of Assets Reporting

Insights:

- Reports related to Theft, Fraud, and Misuse of Assets accounted for 8.5% of all reports and increased 23% year over year.
- Over 50% of reports involved accounting irregularities.
- Fraud allegations made up more than a quarter of this category's reports.

What This Tells Us: When organizations try to cut corners or misrepresent financials, employees feel comfortable reporting their concerns. While the increase in reports is steep, it is at least a positive sign that employees are looking to their employers to act with integrity. It also underscores the importance of hotlines as an accessible reporting pathway for financial concerns.

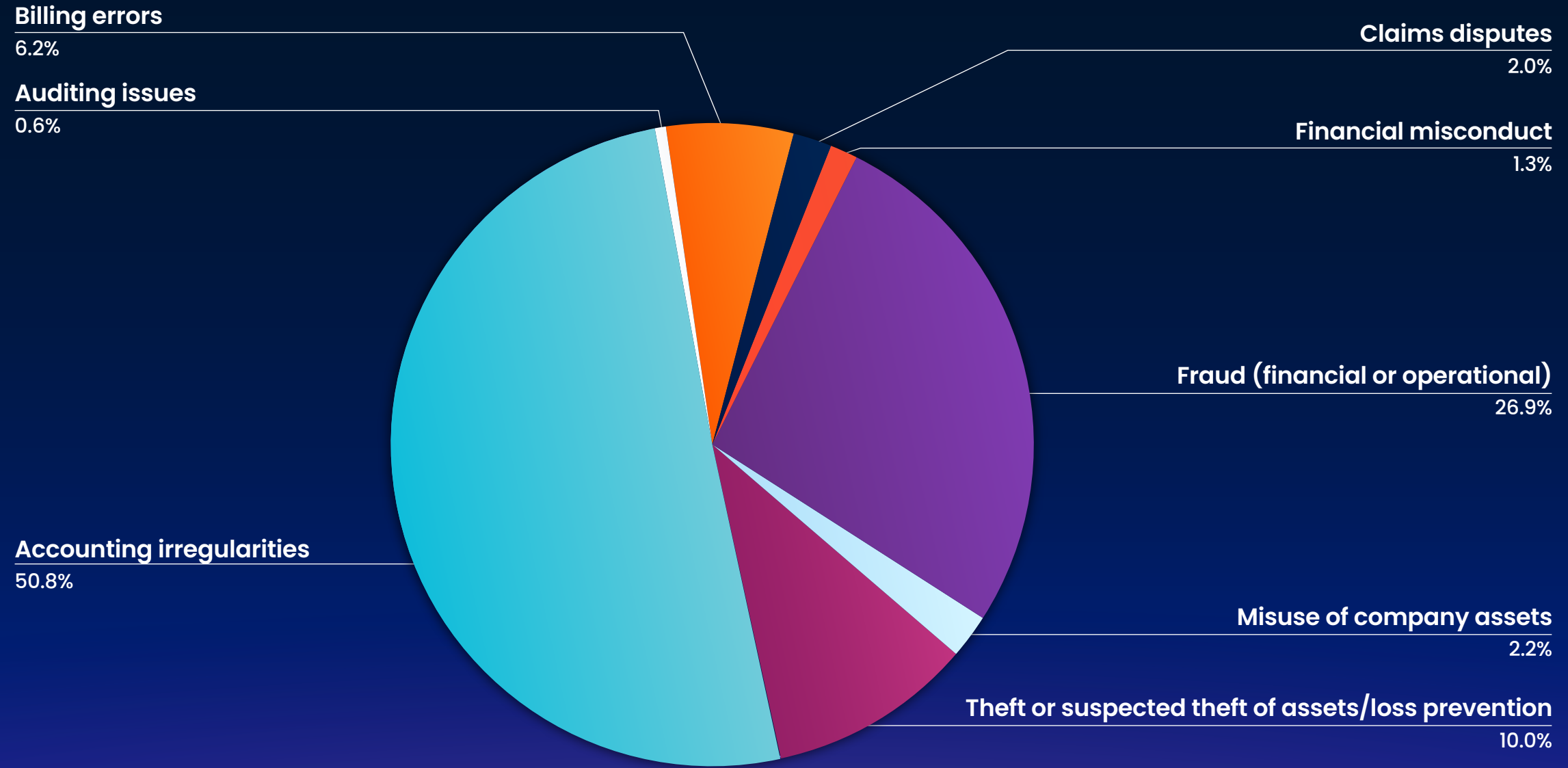
Program Opportunity: These reports often signal broader weaknesses in financial controls, making this an ideal time to update communications and policies on financial reporting expectations.



“ You want your hotline reporting processes to be so front of mind for employees that they know exactly what they’re supposed to do and when.”

ALEX MILLER | Director of Learning Products, Mitratesch

Theft, Fraud & Misuse of Assets Reports



8. Reporting Methods Trend Toward Digital

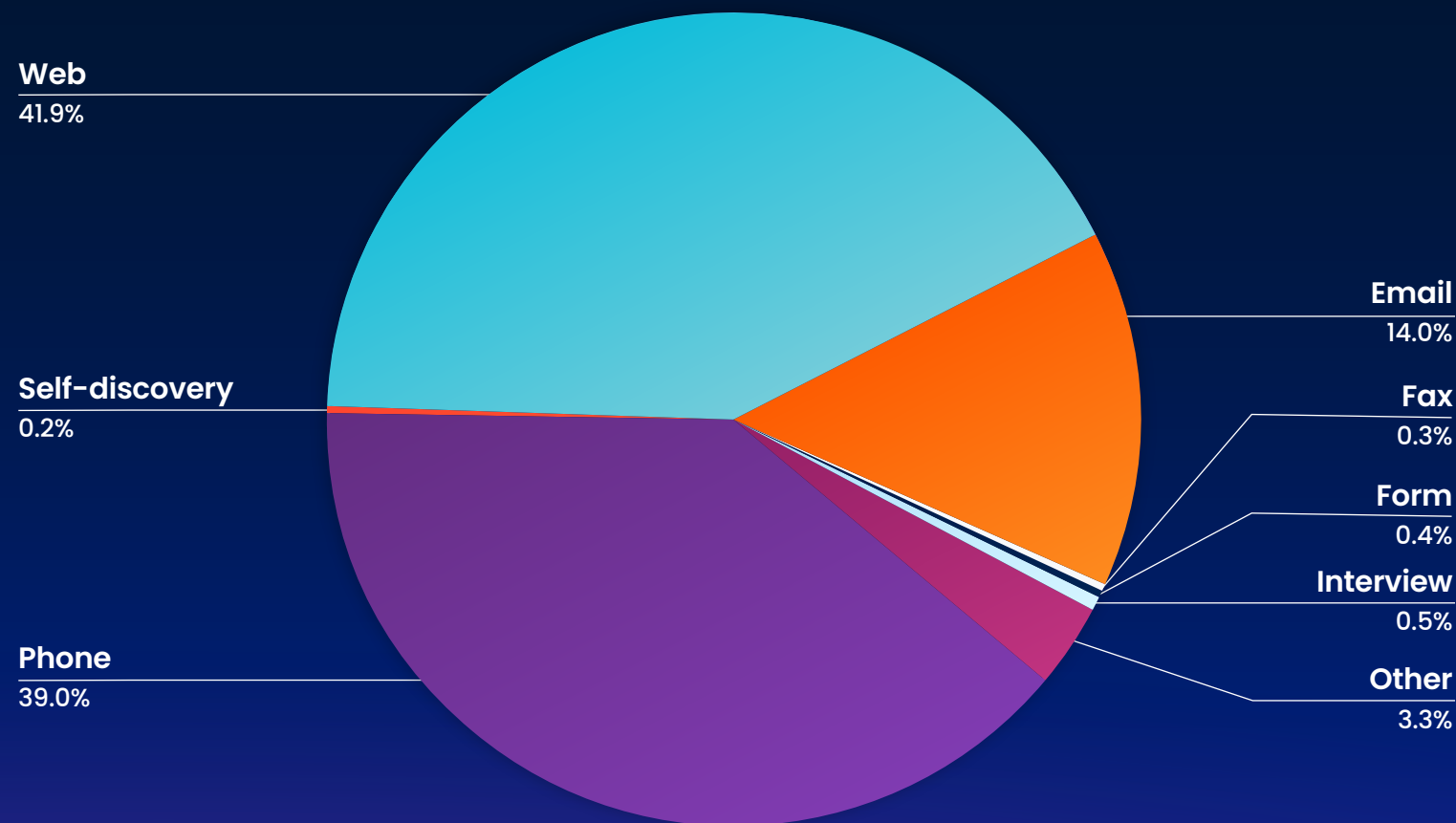
Insight: Web-based reporting accounted for approximately 42% of all submissions. Phone-based reporting remained a close second at 39%. Email submissions represented approximately 14% of total reporting in this category. Lower-volume channels—including fax, letter, form, and text—remain operational but contribute minimally to overall reporting volume.

What This Tells Us: The increase in web-based reporting aligns with broader enterprise trends toward digital self-service, as well as a greater confidence generally in the security and confidentiality of hotlines.

Opportunity: Ensure there are multiple, well-supported, and widely communicated reporting options (in accordance with local law), allowing employees and other concerned stakeholders to report using the method with which they are most comfortable.

Leading Practice: Conduct regular assessments of intake channels to ensure continued ease of use.

Reporting Methods





9. Inter-Industry Shifts Reflect Workforce and Operational Change

HEALTHCARE

Insight: Healthcare reporting remains strong.

What This Tells Us: The healthcare industry's complex and highly regulated environment necessitates structured reporting mechanisms. Required compliance training is likely to lead to higher comfort with reporting.

HOSPITALITY

Insight: Hospitality reporting increased by 33.1%

Not Surprising: This surge reflects well-documented workforce challenges in the sector, including high employee turnover, customer-facing stress, wage and scheduling disputes, and persistently elevated levels of harassment and conduct-related concerns.

Call to Action: This year's growth underscores the increasing need for structured reporting, clearer policies, and strengthened workplace protections across the service industry.

Technology & Telecommunications

Insight: Reports fell 35.9%.

Opportunity: This reduction may correlate with widespread layoffs and workforce contraction. As discussed above, the reporting volume metric is somewhat ambiguous. It is important to monitor this decline because it could signal that employees are not raising concerns. During and after restructuring, organizations should re-communicate reporting methodology options and anti-retaliation policies, and monitor lagging indicators (e.g., spikes in workplace conduct, privacy, or retaliation-related concerns).

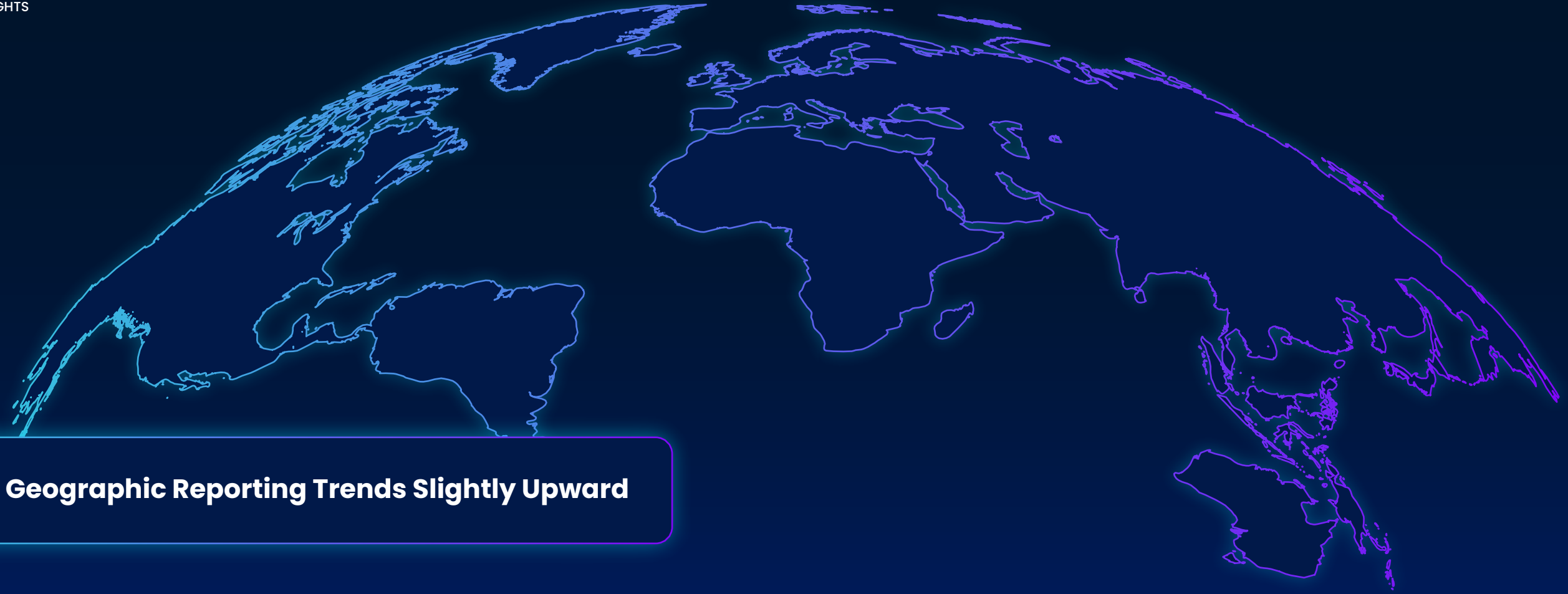
Other Sectors

Each of these sectors saw patterns consistent with prior years—reinforcing the reliability of hotline programs as an operational risk barometer:

- **EDUCATION** reporting stayed consistently high as K-12, universities, and other educational institutions continue to face workforce strain, governance and funding challenges, and violent incidents.
- **MANUFACTURING** reporting remained steady, suggesting a stable—and growing—speak-up culture among frontline and shift-based workers.
- **PROFESSIONAL & BUSINESS SERVICES** continued to see strong HR, conduct, and performance-related reporting, reflecting the interpersonal dynamics common in knowledge-based workforces.
- **RETAIL** surfaced loss prevention issues, customer complaints, HR disputes, and operational integrity concerns.
- **NOT-FOR-PROFIT** organizations generated a diverse mix of HR, safety, client care, and fraud-related reports.
- **GOVERNMENT** reporting remained steady, emphasizing fraud, waste, abuse, and policy compliance cases.
- **TRANSPORTATION & DISTRIBUTION** continued to experience safety, conduct, and incident-based reporting tied to logistics, fleet operations, and public-facing roles.

What These Inter-Industry Trends Mean for Organizations:

Overall, this year's industry movements illustrate a well-established speak-up culture. Reporting concentrates where operational risk and workforce complexity are highest, and it shifts when industries experience volatility. Highly regulated sectors like Health Care and Financial Services continue to show strong internal engagement, while high-turnover, customer-facing industries increasingly rely on hotlines to surface concerns early. Meanwhile, industries experiencing restructuring or cultural turbulence, such as the Technology industry, may be shifting reporting behavior in ways that carry new risk implications.



10. Geographic Reporting Trends Slightly Upward

Insight: There are subtle but meaningful shifts in locations where reporting activity is emerging.

What This Means: Generally, we are seeing gradual growth in reporting activity worldwide, supported by expanding regulatory mandates, localized compliance efforts, and greater employee familiarity with formal reporting pathways.

Going Forward: As global regulations — such as the EU Whistleblower Directive and NIS2 — continue to shape expectations around reporting, data protection, and retaliation prevention, organizations should anticipate continued growth in cross-border reporting activity.

Other Trends & Best Practices

Hotline Implementation Practical Tips

In 2024, the final EU member states completed the [transposition of the EU Whistleblower Directive into national law](#). Now, organizations are grappling with discrepancies among national laws, the complexities of cross-border reporting systems and multiple reporting channels, determining which reports or portions of reports are covered by national laws, and understanding inconsistencies in permitted anonymous reports.

The old challenge of simply communicating the existence of a hotline, methods of reporting, and a policy against non-retaliation – and then monitoring and reporting on trends – seems simplistic compared to today’s reality. How does an organization implement a complex global hotline with sometimes competing local regulations?

Be thoughtful about how you categorize concerns. Refine categories, distinguish questions from allegations, distribute reports efficiently, and prioritize based on severity early in the workflow. These adjustments help prevent overload at critical decision points.

Ensure adaptability. The one certainty in the upcoming year is that regulatory change will continue. Having a system that can constantly accommodate change to remain compliant is critical. Organizations need to be able to quickly adapt their intake and case management processes. Ensure that you have a trusted advisor – not just technology – who can work with you during implementation and beyond.

Consider Your Metrics. Do the metrics you track demonstrate operational efficiencies, including time to acknowledge, time to triage and close, and reassignment frequency?

Did you know? In the EU, responsiveness is not merely best practice. The EU Whistleblower Directive requires acknowledgment within seven days and meaningful feedback within three months. In many cases, the most compliant response is confirmation that the organization investigated and took appropriate action, without sharing details restricted by privacy or employment obligations.

Cultural Considerations

Organizations that adapt communication, training, and intake to local expectations – while maintaining appropriate and consistent investigation quality, data protection, and response discipline – are better positioned to capture insights across borders. Retaliation concerns, as always, are a driving force when employees fail to report. Fortunately, regulatory enforcement continues to emphasize the importance of protecting individuals who raise concerns. Protecting reporters is also a necessary condition for maintaining a healthy organizational culture with trust at its core.

It may be necessary to communicate retaliation protections differently based on cultural norms. In some regions, cultural norms related to hierarchy, authority, and conflict avoidance can affect reporting. Employees may be more inclined to seek informal reassurance before using formal channels, favor indirect reporting routes, or require additional clarity about how concerns are handled. In these environments, visible leadership commitment, clear non-retaliation messaging, and locally-relevant communication are critical to ensuring appropriate reporting.

Hotline-Related Metrics

As hotline programs take on greater strategic importance, leading organizations are moving beyond surface-level metrics. Increasingly, organizations are tracking performance-based metrics such as time to acknowledge, triage, and close; backlog volume; and case reassignment frequency. These indicators provide clear insight into whether reporting systems are functioning smoothly or experiencing friction that can erode confidence and delay action.

Case management quality is also receiving greater attention. Mature programs look beyond speed to assess consistency, documentation, and escalation patterns, recognizing that uneven handling can undermine credibility as dramatically as slow response times.

Board Reporting Expectations

In 2025, compliance leaders pushed to have more collaborative relationships with their boards. At the same time, boards became increasingly vocal about their need for strategically focused, macro-level, integrated, and accurate risk and compliance board dashboards.

Board reporting dashboards, consistent in terms of metrics tracked, should provide clarity on key risks, emerging threats, and the effectiveness of mitigation measures. This is a 180-degree shift from the operational details boards seemed content with a decade ago.

Given the complexities and interconnectedness of compliance, ethics, and risk topics – including the intersection of AI governance, third-party risk management, cybersecurity, and data privacy – it is not surprising that boards increasingly expect integrated reporting that connects indicators and insights across functions.

“ To get to the point of having a trusted, strategic relationship with an ethics and compliance leader, boards need confidence that the system of risk identification and mitigation is working. And that starts with basic, dependable reporting.”

LAURA JACOBUS | EVP Strategic Advisory Services, Mitratach

“ Given the current complexities of enterprise risk management and compliance, having interconnected reporting is really the only viable method to ensure appropriate visibility for the board.”

BRENT COLE | CEO Mitratach GRC

In Closing

Hotlines have evolved from reactive reporting mechanisms into proactive risk predictors. When organizations treat hotline data as a real-time view of employee experience, values, and concerns, they can identify risk earlier, respond more effectively, and build stronger, more ethical workplaces.

This year's data points to opportunity as much as risk. Employees use reporting channels when they trust that leaders will hear their concerns and act responsibly. Organizations that invest in culture, protection, and responsiveness do more than meet regulatory expectations — they increase the likelihood that risks surface early and are managed effectively.

In a landscape defined by shifting incentives and rising scrutiny, organizations will be best served by holistically viewing multiple programs — culture and ethics, investigations, AI and privacy governance, third-party risk management, business continuity, disaster recovery, cross-border regulatory readiness, and more — through a single lens.



Appendix

Respondent Profile & Methodology

OVERVIEW

In 2026, anonymous reporting remains a defining feature of organizational transparency. Over the latest 12-month period, employees and third parties submitted 49,189 hotline reports, a volume consistent with the nearly 50,000 reports documented in the prior year.

INDUSTRIES REPRESENTED

Incidents span a wide range of sectors, including:

Healthcare • Not-for-Profit • Financial Services • Technology • Manufacturing • Business Services • Education • Biotechnology • Retail • Energy • Entertainment • Transportation • Construction • Government • Real Estate • Hospitality • Agriculture

This breadth allows for a balanced view of reporting trends across highly regulated industries and broader corporate environments.

METHODOLOGY

Hotline reports are submitted through telephone, web, email, and digital channels, and stored securely, omitting any personally identifiable information.

Across organizations, incident taxonomy has become increasingly granular (e.g., dozens of harassment variations, multiple fraud subtypes, and expanded privacy/security categories).

Differences in incident naming and organizational taxonomies between 2024 and 2025 required category normalization. The analysis focuses on theme-level shifts, the most reliable way to evaluate year-over-year change. The addition of the AI, Privacy, and Cybersecurity category reflects a surge in technology-related reporting.

INCIDENT REPORT TAXONOMY**WORKPLACE CONDUCT:**

Workplace Conduct includes human resources and employee relations matters – performance issues, conduct concerns, and interpersonal misconduct, including harassment, bullying, discrimination, and retaliation.

WORKPLACE SAFETY:

Workplace Safety reporting includes safety hazards, injuries, environmental risks, vehicle incidents, and other unsafe circumstances such as threats, intimidation, and workplace violence.

ETHICS, INTEGRITY & COMPLIANCE:

Ethics, Integrity & Compliance includes concerns involving corporate integrity, legal compliance, conflicts of interest, policy violations, or ethical misconduct not involving abuse or harassment.

THEFT, FRAUD & MISUSE OF ASSETS:

Theft, Fraud & Misuse of Assets covers financial irregularities (including accounting irregularities and auditing issues), fraud, and misuse or theft of company assets and resources.

PROCESSES & PROCEDURES:

Processes & Procedures reporting covers issues related to workflows, processes, operational inefficiencies, and general business practices.

CUSTOMER EXPERIENCE:

Customer Experience reporting covers service quality, customer interactions, and client satisfaction.

AI, PRIVACY & CYBERSECURITY:

AI, Privacy, and Cybersecurity is a new category. It includes an array of issues such as privacy violations, confidentiality concerns (including HIPAA), unauthorized system access, suspected data theft/breach, and other cybersecurity incidents.

OTHER (INSUFFICIENT INFORMATION):

All reports that lack enough context for categorization.

About Mitratesch GRC

Mitratesch is a global leader in AI-powered Governance, Risk, and Compliance (GRC) software. Our connected platform centralizes risk data, automates key GRC workflows, and strengthens oversight across frameworks and jurisdictions, helping organizations reduce risk, stay audit-ready, and respond confidently to change. Trusted by more than 8,300 organizations across 75 countries, Mitratesch turns compliance from a burden into a strategic advantage.

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