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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a confidential reporting tool created to assist employees in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. EthicsPoint allows users to report concerns, anonymously or identified, so they can be reviewed by the appropriate resources.

Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and ensure compliance with all laws, regulations, and policies and accreditation standards.
- An effective reporting system will support our efforts to foster a culture of integrity and ethical conduct.
- Although we encourage employee to report their concerns directly to their leader, the Compliance & Privacy Office, or Human Resources, we understand that there are circumstances in which employees might not be comfortable making such a report. This reporting system provides an option which allows employees to report a concern with total anonymity if they choose.

How do I report a concern?

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report either by telephone or Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of the Conduct or policies, or any other concern you may have.

If I see a violation, can I just report it to my leader, security, or human resources?

Yes, of course. EthicsPoint is just another resource for our employees. When you observe some behavior that you believe violates our Code of Conduct or any law or regulation, you have a duty to report it. You are encouraged to report these issues to your direct leader, or other member of our leadership team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. In those cases, you may choose to use EthicsPoint. In these circumstances, we would prefer you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner. As an employee of the UVM Health Network (UVMHN), you have a duty to report any behavior that you feel violates our Code of Conduct or other laws and regulations. By working together, we can maintain a healthy, productive, and patient-centered environment. Misconduct can threaten the entire organization, as well as the community we serve.

Does leadership really want me to report?

We certainly do. In fact, we *need* you to report. We can't address what we don't know about. You may have some knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the organization, our employees, and patients. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the UVM Health Network who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has received training in keeping these

reports in the utmost confidence. If you are concerned that your report involves someone who may be charged with evaluating EthicsPoint reports, you should know that EthicsPoint has alternative recipients for these situations.

What happens after I file a report?

It is my understanding that any report I send from a UVMHN computer generates a server log that shows every web-site that my PC connects with. If I access EthicsPoint from my work computer, will this identify me as the report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside of your work environment through the EthicsPoint secure website.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. If you do choose to be identified, the UVMHN representative will still keep your identity confidential to the extent possible consistent with the investigation.

Confidentiality & Security

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

The UVM Health Network promotes ethical and honest behavior. All unethical conduct, at any level, ultimately hurts the organization, our patients, and all of our employees, including you. You only have read the news to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy organizations. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself, your coworkers, and our patients to report it.

I am not sure if what I have observed or heard is a violation of policy, or if it involves unethical conduct. I want to file a report, but I am worried I might be wrong. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure. If the conduct does not violate any law or policy, the UVMHN representative may provide an explanation in the system so that you can understand why it was not improper. EthicsPoint will provide you with information on how you can later check back for messages while maintaining anonymity.

What if my leader or other leaders are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. Your leader or other leaders may be questioned if necessary, but they will never see your report.

What if I remember something important about the incident after I file the report? Or what if the UVMHN representative has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a UVMHN representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer questions. You and the UVMHN representative now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the Internet?

If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.