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What is Le Moyne Ethics Reporting (Whistleblower) Hotline?

Le Moyne Ethics Reporting (Whistleblower) Hotline is a reporting tool hosted by a third party (EthicsPoint) to provide our faculty, staff and students with a simple, anonymous way to confidentially report activities of fraud, abuse, workplace misconduct or violations of the College's policies.

This hotline service does not replace or supersede existing reporting methods. Instead, the EthicsPoint system is intended to offer an additional means of reporting in situations in which the individual making the report is unable or unwilling to use the existing procedures and provides a method of reporting issues anonymously. See the Le Moyne College Policies for direction regarding existing reporting methods.

All reports submitted under existing reporting methods or through EthicsPoint will be handled promptly and discreetly. The college may have further information on your report, or may require further information from you in order to proceed with an investigation. We encourage hotline reporters to return to the Le Moyne Ethics Reporting (Whistleblower) Hotline website within 10 calendar days from filing a report to check the status, using the report key assigned to you by EthicsPoint and your private password.

If an investigation shows that a faculty, staff or student has engaged in wrongful conduct they will be subject to the College's corrective action procedures, up to and including termination from employment.

Why do we need a system like Le Moyne Ethics Reporting (Whistleblower) Hotline?

- By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- To have an anonymous reporting vehicle to address fraud, abuse, workplace misconduct or violations of College policies directly with Le Moyne Senior Management.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

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May I report using either the Internet or the telephone?

Yes. With Le Moyne Ethics Reporting (Whistleblower) Hotline, you have the ability to file a confidential, anonymous report via either the telephone or the Internet. You can file a report from any computer that can access the Internet. If you do not have access or are uncomfortable using a computer, you can call the Le Moyne Ethics Reporting (Whistleblower) hotline toll-free 855-830-6524 that is available 24 hours a day, 365 days a year.

What type of situations should I report?

The Le Moyne Ethics Reporting (Whistleblower) Hotline system is designed for faculty, staff and students to report any violation stated in the college's Code of Conduct or Ethics policies. Reports should be factual and contain as much specific information as possible. All reports must be made in good faith (i.e. do not report baseless allegations).

Examples are:

- Violations of state and/or federal laws and regulations
- Violations of Le Moyne College policies
- Unreported conflict of interest, as described in the College's conflict of interest policy
- Use of College property, resources, or authority for personal gain or other non-College related purposes
- Improprieties which could include fraud, waste, abuse or irregular activities
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Situations not listed above should be directed through existing reporting methods. See Le Moyne College Policies for direction regarding existing reporting methods.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct or ethics policies, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

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

Le Moyne College chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the College, the faculty, the staff and the students, including you. You only have to consider what happened in recent College scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy College. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues to report it.

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 and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Misconduct can threaten the livelihood of an entire college community.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. Le Moyne Ethics Reporting (Whistleblower) Hotline call center staff (855-830-6524) can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you were not sure.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our college - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the college and our faculty, staff and students. Also offering positive input may help identify issues that can improve culture and performance.

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

The Le Moyne Ethics Reporting (Whistleblower) Hotline system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

Where do these reports go? Who can access them?

Reports are entered directly onto EthicsPoints secure server and are only made available to specific individuals within Le Moyne College who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

In addition, when you anonymously report through Le Moyne Ethics Reporting (Whistleblower) Hotline system the report recipients will only be able to view the information that is reported. Due to this the timing or the ability to complete an investigation may be hampered.

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

When you file a report at the Le Moyne Ethics Reporting (Whistleblower) Hotline Web site or Call Center, you receive a unique user name and are asked to choose a password. You can return to the Le Moyne Ethics Reporting (Whistleblower) Hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a College 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 College questions. You and the company now have entered into an "anonymous dialogue" where situations are not only identified but can be resolved, no matter how complex.

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It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

Our third party processor (EthicsPoint) does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to third party processor (EthicsPoint) and subsequently the Le Moyne Ethics Reporting (Whistleblower) Hotline system is available. In fact, third party processor (EthicsPoint) is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on a College PC, you have the option of using a PC outside of the College environment (such as one located at an Internet café, at a friend's house, etc.) through the Le Moyne Ethics Reporting (Whistleblower) Hotline 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 our third party processor (EthicsPoint) strips away Internet addresses so that anonymity is totally maintained. Plus, our third party processor (EthicsPoint) is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide Le Moyne Ethics Reporting (Whistleblower) Hotline will ultimately reveal my identity. How can you assure me that will not happen?

Our third party processor (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 telephone 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 Le Moyne Ethics Reporting (Whistleblower) Hotline 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.

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

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