

EthicsPoint is not a 911 or emergency service. If there is a risk to health or safety, please dial 911, Campus Police (585-2490), or local authorities.

General Background

What is EthicsPoint?

EthicsPoint is an independent, third-party provider of anonymous internet and telephone hotline services. It helps the college's leadership and members of the Smith community to address and report fraud, misconduct, bias incidents and other ethical issues in our community.

The EthicsPoint platform allows a community member to ask a question or report a concern anonymously and get a reply directly back.

Is this a change in college policy?

No. EthicsPoint is not a policy; it is a mechanism for reporting ethical concerns. It neither adds nor removes any of the individual's or the college's rights or responsibilities that currently exist under college policy.

Why did Smith adopt EthicsPoint?

In keeping with the college's commitment to sustaining a safe and ethical environment, Smith is providing an additional anonymous mechanism—beyond existing channels (e.g., the Office of Human Resources; the Provost's Office; the President's Office; the Office of Inclusion, Diversity and Equity; the Office of the Dean of Students)—to report ethics concerns. Examples of such concerns would include fraud, abuse, misconduct, conflict of interest, bias incidents in the community at large, and lack of compliance with laws and regulations. Having an online process makes it easier and more secure for all members of our community to report concerns. More than 800 institutions of higher education worldwide use EthicsPoint. These include Bowdoin, MIT, Princeton, Cornell, Amherst and Tufts.

Does Smith really want me to report?

Yes. Ethical conduct and transparency are part of the core values of the Smith College community. Unethical conduct hurts all of us: faculty, staff and students. If you are aware of an incident of misconduct or an ethical violation, Smith College wants to know about it and will investigate to determine how to address it.

What if I suspect something is wrong but am not sure?

Many problems are uncovered as the result of concerns expressed by individuals who may not be sure of the facts but are sufficiently troubled about how an activity or behavior may affect Smith or themselves. The information you provide will be evaluated, then a determination will be made as to whether any further investigation is warranted.

Why use a third-party online product for ethics reporting?

When an incident is reported through EthicsPoint, the program allows the college to send a message to the reporter while maintaining the reporter's anonymity and privacy. This allows those with questions to ask them fully confidentially and also allows the college to reply. That might include a request for more information, a clarifying question or additional information, a referral or a statement of closure on an inquiry—none of which we can do now in the case of anonymous reports.

Why do we need a reporting mechanism?

It is vital that institutions have an anonymous mechanism for reporting ethical violations. Financial fraud and abuse, for example, have significant detrimental effects on organizations and institutions as well as on employee and student morale. Further, ethics violations are frequently underreported due to fear of retaliation, intimidation or penalty. The Association of Certified Fraud Examiners (ACFE) 2016 survey indicates that, by far, the most common way organizations detect fraud is through anonymous tips. According to this survey, 39.1 percent of fraud incidents in U.S. organizations were discovered through tips, while only 16.5 percent were uncovered by internal audit and 13.4 percent were uncovered by managerial review. According to the ACFE, more than half the tips from whistleblowers came in through online reporting. Further, regardless of whether the organization is private, public, municipal or not-for-profit, inside tips are the most common method of discovering unethical misconduct.

Is EthicsPoint the only way someone at Smith can report a concern anonymously?

No. Like most institutions and organizations, Smith already receives anonymous complaints, whether in the form of unsigned notes, emails from anonymous accounts, messages on social media, unidentified phone calls and so on.

Does adopting EthicsPoint mean Smith privileges anonymous reports over open dialogue?

No. When possible, the college encourages open dialogue and resolution of disputes. Despite protections against retaliation—for example, whistleblower laws—some people feel safer having an anonymous reporting option, particularly when there is a power differential between the reporter and the person allegedly engaging in unethical conduct.

Is EthicsPoint secure?

Yes. EthicsPoint's website and global architecture are designed and operated under best practice guidelines for data and systems security. EthicsPoint has more than 12,000 clients and has never experienced a security breach.

Using EthicsPoint

What types of complaints could I report through EthicsPoint?

EthicsPoint is designed for concerns relating to violations of the college's Code of Conduct and allegations of fraud or unethical behavior in financial matters, environmental health and safety, research and student safety, athletics, as well as conflicts of interest, bias incidents in the community, and academic misconduct.

Is EthicsPoint intended to be used to report concerns about issues in the classroom?

No. For concerns about the classroom, including issues of bias, we encourage students, whenever possible, to talk about the issue with their faculty member, adviser, and/or with the department chair. Students may also consult about concerns regarding issues in the classroom with the associate provost, the dean of students and the vice president for inclusion, diversity and equity.

How does EthicsPoint maintain my anonymity?

The server is hosted off-site by EthicsPoint. Neither EthicsPoint nor Smith has an independent means of identifying reporters. The only information the college will receive about a reporter is what the individual chooses to submit through the EthicsPoint system. Reporters who want to remain anonymous should be careful not to inadvertently submit identifying information when filing a report (e.g., “From my desk next to Jane Doe...”).

How do the anonymous website and hotline work?

The service is available 24 hours a day, 365 days a year. When you access the website or call the hotline, you are asked to describe the nature of the suspected problem. If you use the web-based service, you complete a questionnaire. After your report is submitted, EthicsPoint notifies the appropriate Smith official within one business day.

Is the telephone toll-free hotline confidential and anonymous, too?

Yes. You will be asked to provide the same information you would report online, and an interviewer will type your responses into the EthicsPoint website. These reports have the same security and confidentiality measures applied to them during delivery.

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

Yes. Any report, no matter where it is submitted from, will remain secure and anonymous. The internet portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses to maintain anonymity.

Do I have to identify myself?

No. You have the option of identifying yourself, but only if you want to. No one will know you called EthicsPoint or submitted a report through the website unless you choose to identify yourself. All reports will be handled the same whether they are submitted anonymously or not.

Is the phone call recorded? If so, can the electronic report be traced back to me?

No. Phone calls are not recorded. Information provided through the website is maintained by EthicsPoint, and the site is designed not to be traced back to the source.

What if I want to be identified with my report?

There is a section in the report where you may identify yourself if you would like to.

Is EthicsPoint intended to be used to request an accessibility or disability accommodation?

No. Students can find information regarding accommodation requests at Disability Services. Employees can find information regarding accommodation requests at the Office of Human Resources.

After a Report

Will there be an investigation after the information is reported to the college?

If sufficient information or evidence of fraud or conduct in violation of college policy is provided, an investigation will likely occur. Whether an investigation is initiated depends on several factors, such as the nature of the information, the extent to which it can be verified, the specificity of the details provided, and (if applicable) the amount of supporting documentation the reporter can provide using the EthicsPoint file-upload reporting option.

How do I stay involved after I contact the anonymous reporting hotline?

After you submit your report through the hotline, you may be asked to provide additional information to initiate or complete the investigation. When you submit the report, you will be issued a “report key,” along with a password of your choosing, which enables you to return to EthicsPoint through the website or telephone hotline within 10 business days. If you return within 10 business days, you will have the opportunity to review any follow-up questions and, if you would like, to submit more information.

Who receives reports from EthicsPoint? How are they trained?

Reports of discrimination, harassment and bias in the community at large are sent to the vice president for inclusion, diversity and equity. All other reports go to the Associate Vice President for Human Resources. Both have been trained to use EthicsPoint, and will receive periodic training as needed. The vice president for inclusion, diversity and equity will receive yearly training on bias incidents and issues regarding academic freedom and freedom of expression.

Who keeps records of reports transmitted through EthicsPoint, and for how long?

Bias incident reports will be kept by the Office of Inclusion, Diversity and Equity for the purposes of collecting aggregate data but individually identifiable information will be purged at the end of each academic term. For example, reports initiated during the summer will be purged at the end of the fall semester. Other record keeping will depend on the incident reported, and on any record retention laws or regulations that may apply.

Bias Incidents

What is a bias incident?

A bias incident is an act of bigotry, harassment or intimidation committed by a member of the Smith community directed at another member or members of the Smith community based on their age, color, creed, disability, gender identity, gender expression, race, religion, nation/ethnic origin, sex, sexual orientation or veteran status. This includes, but is not limited to, slurs, graffiti, written or digital messages or images that harass or intimidate individuals or groups because of their membership in the above-listed

protected classes

Why are we concerned with bias incidents?

Bias incidents often cause significant harm to campus communities. Campus turmoil at colleges and universities in recent years has been sparked by bias incidents.

Bias incidents typically take the form of graffiti and other property damage. With a better reporting mechanism, the college can take immediate action to remove the damage. Further, we can better identify and respond to patterns of concern, with the goal of identifying appropriate educational responses (i.e., programming, training) and connecting individuals affected by bias incidents with supportive resources.

What will Smith do with a bias incident report?

Establishing a mechanism to report bias incidents supports the college's commitment to maintaining an inclusive campus climate. Through reports of bias incidents, we will be better informed of barriers to inclusion. EthicsPoint does not provide a mechanism for investigative or disciplinary action for reports of bias incidents. It enables the college to track bias incidents, collect aggregate data, identify educational responses, and connect individuals affected by bias incidents with supportive resources. No member of the community shall face an investigation and discipline from a report of bias unless the reported conduct violates college policy or applicable law. Smith will not conduct an investigation of any community members without them knowing as soon as is feasible what they are being accused of and who is making the accusation.

Will a report of a bias incident go into an employee's personnel file?

No. Incident reports will be kept by the Office of Inclusion, Diversity and Equity for the purposes of collecting aggregate data but individually identifiable information will be purged at the end of each academic term. There will be an investigation only if the alleged incident is separately a violation of Smith policy or applicable law. Further, under Massachusetts law, any employee may review their personnel file and must be notified if any information is used, has been used or may be used to negatively affect the employee's qualification for employment, promotion, transfer, additional compensation or the possibility that the employee will be subject to disciplinary action.

Were bias incidents reported before EthicsPoint?

Yes. Some reports have come in through the Office of Human Resources; the dean of students; or the Office of Inclusion, Diversity and Equity. Others have come in through reports to faculty or staff. Still other concerns have come to the college's attention through anonymous letters and through "dummy" email accounts. However, many reports reached the administration several days and weeks after the incidents occurred, leaving them unaddressed.

What do other institutions do with regard to bias incidents?

Although not all institutions provide for online bias reporting, most have a mechanism to report.

