

FGCU HOTLINE

FREQUENTLY ASKED QUESTIONS

WHAT IS THE FGCU HOTLINE?

The FGCU Hotline (Hotline) is a reporting mechanism that facilitates reporting of alleged illegal, unethical, or improper conduct when the normal channels of communication have proven ineffective, or are impractical under the circumstances. The Hotline is available to employees and students, as well as contractors, vendors, and members of the southwest Florida community. If you are unsure of how to bring forward your concern, you can always contact FGCU's Director of Equity, Ethics, and Compliance for assistance, but if you are uncomfortable reporting through normal channels of communication, or wish to raise an issue anonymously, you should access the Hotline.

The Hotline is available 24 hours a day, 365 days a year, and is run by an independent, third-party provider called EthicsPoint. It is an anonymous Internet- and telephone-based reporting tool that allows University stakeholders to work together to address misconduct at the University and help cultivate a positive work environment. You can contact the Hotline by:

- Completing an on-line form at the following link: www.fgcu.ethicspoint.com.

WHY DID FGCU IMPLEMENT THE HOTLINE?

The University implemented the Hotline to provide a proactive deterrent to unethical conduct and to demonstrate its commitment to ensuring that FGCU conducts business in a trustworthy manner. The Hotline allows FGCU employees and stakeholders to bring forward good-faith concerns and assist the FGCU Board of Trustees, President, and Cabinet with upholding high standards of ethics and integrity in the workplace. Through open channels of communication, the Hotline encourages FGCU employees to think about and address ethically significant issues that arise in the workplace, and it enables FGCU employees to step up and do the right thing.

WHAT KINDS OF CONCERNS SHOULD I REPORT?

You have an obligation to report any situation in the workplace which you believe is contrary to University policy or regulation; state or federal law, rule, or regulation; or contract or grant requirement. Examples of typical Hotline issues include:

- Theft or abuse of FGCU assets
- Misuse of sponsored research, contract, grant, or financial aid funds
- Questionable conduct of research or academic integrity concerns
- Inappropriate relationships between a manager and subordinate, professor and student, or FGCU employee and a vendor/contractor
- Inappropriate gifts from a vendor or contractor
- Harassment, intimidation, retaliation, or discrimination against an FGCU employee or student
- Falsification of time sheets or other FGCU records
- Information security breach
- Records destruction not in keeping with records retention schedules

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- Purchase of personal items on an FGCU P-Card
- Improper financial reporting or questionable accounting practices
- Environmental health or safety concerns

WHY CAN'T I JUST REPORT OBSERVED VIOLATIONS TO MY SUPERVISOR OR MANAGER?

You can. The University encourages you to report suspected violations through your management chain of command. But, if you have tried unsuccessfully to address your concern through a manager/supervisor, or you are not comfortable reporting a concern to a University administrative official, you have the option of using the Hotline. In so doing, you also have the option of filing an anonymous concern.

DOES THE FGCU BOARD OF TRUSTEES, PRESIDENT, AND CABINET ENCOURAGE REPORTING?

They certainly do. In fact, the University needs you to report good-faith concerns. You know what's going on around campus – both good and bad. You may have important information about an activity that could be cause for concern. Your reporting can minimize the potential negative impact on the University and its reputation and can help identify issues that can improve University culture and performance.

I AM CONCERNED THAT THE INFORMATION I PROVIDE THROUGH THE HOTLINE WILL ULTIMATELY REVEAL MY IDENTITY. HOW CAN YOU ASSURE ME THAT WILL NOT HAPPEN?

The EthicsPoint system is designed to protect your anonymity if you desire. EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer, tablet, or phone to EthicsPoint is available. A report filed from your office desktop, home computer, neighbor's computer, or any Internet portal will remain secure and anonymous. Similarly, phone calls made to EthicsPoint are not traced or recorded. While we strive to maintain anonymity, depending on the particularized details you present you may be identifiable.

It is also important to note anonymity does can provide certain restraints to an investigative process. For example, if you do not provide sufficient details to move forward with an investigation, it is difficult for the responding office to take any action. Luckily, through the EthicsPoint system we are able to communicate with you while you still remain anonymous.

Our University Anti-Retaliation policy protects even an anonymous reporter from Retaliation. We understand that reporting can be scary. However, we have set up systems to offer you support and protection.

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I AM AWARE OF MISCONDUCT ON CAMPUS, BUT IT DOES NOT AFFECT ME. WHY SHOULD I BOTHER REPORTING IT?

FGCU chooses to promote ethical behavior. All unethical conduct, at any level, ultimately harms the University and its employees and erodes the culture and reputation of the University. So, if you know of any incidents of misconduct occurring on campus, consider it your duty to report it.

I AM NOT SURE IF WHAT I HAVE OBSERVED IS A VIOLATION OF UNIVERSITY POLICY OR RISES TO THE LEVEL OF MISCONDUCT, BUT IT JUST DOESN'T LOOK RIGHT TO ME. WHAT SHOULD I DO?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. The University would prefer that you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

WHERE DO REPORTS GO? WHO CAN ACCESS THEM?

Reports are entered directly on the EthicsPoint secure server and are made available only to specific individuals within the University. FGCU's Director of Equity, Ethics, and Compliance is the primary contact point and the Director of Internal Audit is the secondary contact point; these two University employees are committed to maintaining the utmost confidence and discretion. Similarly, EthicsPoint staff are trained and committed to ensure that no report is ever shared with implicated parties, their peers, or subordinates.

WHAT IF I REMEMBER SOMETHING IMPORTANT ABOUT THE INCIDENT AFTER I FILE A REPORT? WHAT IF THE UNIVERSITY HAS FURTHER QUESTIONS FOR ME?

When you file a report on the EthicsPoint website or via the toll free telephone number, you receive a unique report key along with a password of your choosing. You can return to the EthicsPoint system by Internet or telephone and access the original report to answer questions posed by an FGCU official or add further information that may help resolve an open issue.

WHAT IF I WANT TO BE IDENTIFIED WITH MY REPORT?

There is a section in the report for identifying yourself, if you wish.

WHAT ARE MY RESPONSIBILITIES IN BRINGING FORWARD A CONCERN?

You have a responsibility to bring forward your concern in good-faith and allow a University official to review your concern. You must not:

- Contact the suspected individual in an effort to determine facts or demand restitution, or
- Discuss the case, facts, suspicions, or allegations with anyone unless specifically authorized to do so by the Director of Equity, Ethics, and Compliance or University official assigned to the review.

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An employee or student who uses the Hotline to intentionally harm or impugn the integrity of another employee, student, contractor, vendor, or any University stakeholder, will be subject to disciplinary action, sanctions, or loss of contract, as appropriate.

WHAT IF I JUST WANT TO GET SOME ADVICE AND ASSISTANCE FROM A UNIVERSITY EMPLOYEE. DO I HAVE TO USE THE ETHICSPPOINT HOTLINE SYSTEM?

Fortunately, FGCU has in place some excellent resources for its faculty, staff, and students. In addition to the EthicsPoint Hotline system to bring forward good-faith concerns of wrongdoing, you can always discuss a matter with:

- Your supervisor or manager;
- Monique McKay, University Ombuds and Assistant to the President, for informal, impartial and non-adversarial alternatives concerning conflict management at (239) 590-1022 or mmckay@fgcu.edu;
- Precious Gunter, Director of Equity, Ethics, and Compliance, and Title IX Coordinator, for harassment, discrimination and sexual misconduct allegations or for violations of University policy or regulation at (239) 745-4366 or pgunter@fgcu.edu;
- Keenan Johns, Assistant Athletic Director for Compliance, for NCAA compliance concerns at (239) 590-7573 or kjohns@fgcu.edu;
- James Casey, Interim Associate Vice President, Research Administration concerns, at (239) 590-7021 or jcasey@fgcu.edu;
- Dr. Christopher Blakely, Assistant Vice President for Campus Life/Dean of Students, for academic integrity concerns, at (239) 590-7991 or cblakely@fgcu.edu;
- Bill Foster, Director of Internal Audit, for fraud, waste, and abuse allegations at (239) 590-1709 or wfoster@fgcu.edu;
- Rhonda Holtzclaw, Director of Environmental Health and Safety, for environmental health and safety concerns at (239) 590-1037 or rholtzcl@fgcu.edu;

IF I SUBMIT CREDIBLE EVIDENCE OF WRONGDOING THAT RESULTS IN A FORMAL REVIEW, HOW LONG WILL THE REVIEW TAKE?

The length of the review depends upon many factors, such as the complexity of the issue, the number of individuals involved and interviews to be conducted, the nature and extent of documents or other evidence that must be obtained and analyzed, and the urgency of the matter. FGCU recommends that you follow up on the report you made within five to seven business days. At that time, the Director of Equity, Ethics, and Compliance or other University official assigned to review the matter will seek additional information from you, as necessary, and provide you with an estimated completion date. The Director of Equity, Ethics, and Compliance and University official will make every effort to complete the review within 45 to 60 days.