

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security, Confidentiality & Anonymity](#)

[Tips & Best Practices](#)

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global. The EthicsPoint system allows individuals to anonymously and/or confidentially seek compliance advice, report a compliance issue, concern or violation, or provide positive suggestions. There are two EthicsPoint reporting options available—the EthicsPoint web portal and the toll-free EthicsPoint telephone hotline.

How do I access the EthicsPoint system to submit a report?

You can access the toll-free EthicsPoint telephone hotline by calling 844.241.6860.

You can access the EthicsPoint web portal by visiting: circare.ethicspoint.com.

Why does Circare need a system like EthicsPoint?

- We believe that our workforce is our most important asset. By creating open channels of communication, we promote a positive, supportive, and productive work environment.
- An effective reporting system helps to foster a culture of honesty, fairness, integrity, and ethical decision-making.

Reporting – General

May I report using either the web portal or the telephone hotline?

Yes. With the EthicsPoint system, you have the ability to submit an anonymous and/or confidential report via the EthicsPoint web portal or the EthicsPoint telephone hotline. The EthicsPoint system is available 24 hours a day, 365 days a year.

What type of situations should I report?

The EthicsPoint system is designed for reporting any violation of the agency's Compliance Program, Code of Conduct, or any other concern you may have.

If I see a violation, shouldn't I just report it to my supervisor and let them deal with it?

When you observe behavior that you believe violates the agency's Compliance Program or Code of Conduct, we expect you to speak up and report it. Ideally, you should bring any questions, issues, concerns, or violations forward to any supervisor, the Corporate Compliance Officer, or any other individual in a higher position of authority, up to and including the Executive Director and the President of the Board of Directors. We recognize, however, that there may be circumstances when you are not comfortable asking questions or reporting issues, concerns, or violations in this manner. For those circumstances we encourage you to use the EthicsPoint system to submit an anonymous and/or confidential report. We would rather you speak up and make a confidential or anonymous report 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 and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a ethical and productive environment.

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 agency—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 agency, the people we serve, and our workforce. Also, offering positive input may help identify things that can improve our agency culture and performance.

Where do these reports go? Who can access them?

Reports made through the EthicsPoint web portal or the EthicsPoint telephone hotline are maintained on a secure server owned and operated by NAVEX Global. NAVEX Global makes EthicsPoint reports available only to specific individuals within the agency who are responsible

for investigating the report based on the type of issue reported. Each individual responsible for investigating a report is required to maintain confidentiality within the agency's compliance reporting structure.

Isn't this system just an example of someone watching over me?

The EthicsPoint system is an important and effective tool to help the agency maintain a safe, secure, and ethical workplace. We want you to be able to speak openly about the things you see and hear in the workplace that you feel should be reported. We encourage you to use the EthicsPoint system to seek compliance advice, report a compliance issue, concern or violation, or provide positive suggestions.

Reporting Security, Confidentiality & Anonymity

What's the difference between a confidential report and an anonymous report?

All reports made through the EthicsPoint web portal are confidential. If you choose not to provide your name and contact information, your report will be anonymous.

When I make a report through the EthicsPoint web portal, what information is EthicsPoint collecting about the device I used to submit the report?

The EthicsPoint portal does not generate or maintain any internal connection logs with IP addresses, so no information about your Circare computer, tablet, or smartphone is captured when you make a report through the EthicsPoint portal.

If you feel uncomfortable making a report on a Circare device, you have the option of using any other computer, tablet, or smart phone.

Even if I choose not to provide my name, I am concerned that the information I provide through EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system allows you to choose whether or not your report is anonymous. To ensure you remain anonymous, do not provide your name or contact information and be sure not to include information in the body of the report that may unintentionally reveal your identity. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

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

Yes. All reports made through the EthicsPoint telephone hotline are confidential. When you call the telephone hotline, you will be asked to provide the same information that you would have provided through the EthicsPoint web portal. An interviewer will ask you a structured set of questions and enter your responses into an EthicsPoint report. To remain anonymous, do not provide the interviewer with your name or contact information and avoid giving the interviewer information that may unintentionally reveal your identity.

What if I do not want to remain anonymous when making a report?

When submitting a report using the EthicsPoint web portal, there is a section in the report where you can provide your name and contact information, if you wish. Likewise, when making a report through the EthicsPoint telephone hotline, you may provide the interviewer with your name and contact information, if you wish.

What if I make a report about another member of the Circare workforce and they find out? I'm worried they will retaliate against me.

Circare prohibits intimidation of and retaliation against any individual who participates in good faith in its Compliance Program. Specific areas of protection include, but are not limited to, seeking compliance advice, reporting a compliance issue, concern, or violation, participating in a compliance investigation, self-evaluation, audit, or corrective action, and reporting to appropriate officials as allowed by New York State Labor Law §§ 740 and 741. Members of the Circare workforce who are found to have engaged in intimidation or retaliation will be subject to disciplinary action up to and including termination.

Tips & Best Practices

I am aware of some individual(s) who may have violated the Compliance Program or the Code of Conduct, but it doesn't affect me. Why should I bother reporting it?

Circare has chosen to conduct its business with honesty, fairness, and integrity. Unethical conduct, at any level, ultimately hurts the agency, the people we serve, and our workforce—including you. So if you become aware of any compliance issues, concerns, or violations, you have an obligation to report them, *even if you only suspect that problem exists or has occurred.*

I am not sure if what I have observed or heard is a violation of the Compliance Program or the Code of Conduct, but it just doesn't look right to me. What should I do?

Make a report. 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. Remember, you have an obligation to report compliance issues, concerns, or violations, *even if you only suspect that problem exists or has occurred.*

What if my boss or other managers 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. Also, Circare prohibits intimidation of and retaliation against any individual who participates in good faith in its Compliance Program. Members of the Circare workforce who are found to have engaged in intimidation or retaliation will be subject to disciplinary action up to and including termination.

What if I remember something important about the incident after I submit a report? Or what if the investigator has further questions about my report?

When you submit a report through the EthicsPoint portal or through the telephone hotline, you receive a unique report key and are asked to create a password. The report key and password are tied back to the original report you made. You can use the report key and password to return to the EthicsPoint system through the EthicsPoint web portal or the EthicsPoint telephone hotline and access the original report to add more detail or answer questions posed by the investigator. The report key and password will remain active until the report has been fully investigated and resolved.

Are these report follow-ups as secure as the first one?

All interactions through the EthicsPoint system just as secure as the initial report, will remain confidential within the compliance reporting structure, and will remain anonymous so long as the reporter chooses not to provide his/her name or contact information.

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

Submitting a report through the EthicsPoint web portal requires an Internet connection. If you don't have an Internet connection, you can submit a report through the toll-free EthicsPoint telephone hotline.