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About the Compliance Hotline

What is the Compliance Hotline?

The Compliance Hotline is a confidential reporting tool created by NAVEX Global to assist administration, staff, faculty and students to work together in addressing misconduct in the workplace and on campus, all while cultivating a positive work and educational environment.

Why do we need a system like the Compliance Hotline?

- To create additional confidential reporting channels and upward communications. We hope this will help promote a positive work and learning environment and maximize productivity.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With the Compliance Hotline, you have the avenue to file a confidential, anonymous report via either the telephone or the Internet. There will be no attempt to trace the person making the report.

What type of situations should I report?

The Compliance Hotline system is designed for employees and students to report any violation of our policies, or other concern such as:

Fraud--The intentional misrepresentation or concealment of information in order to deceive, mislead, or acquire something of value.

Theft--The act of stealing; specifically: the taking and removing of personal property with intent to deprive the University of it.

It is important that any report you make be made in good faith, with truthful information and not for an inappropriate purpose, such as a personal dispute with another person.

Keep in mind that more recent incidents will be easier to investigate than incidents that occurred many years ago.

If I see a violation, shouldn't I just report it, if I am an employee, to my manager, security, or human resources, or if I am a student to university administration or a faculty member, and let them deal with it?

When you observe some behavior that you believe violates our policies, we expect you to report it. We strongly encourage faculty, employees, students and other members of the university community to report compliance concerns directly through normal lines of communication to applicable managers, administration, faculty or, for employees covered under the collective bargaining agreement, the reporting channel set out in the collective bargaining agreement. Many compliance issues may arise unintentionally and can be easily resolved by talking with the people involved. For example, there are designated people on campus trained to take reports of sexual harassment and we encourage you to report those matters to those individuals. For employees, we encourage you to bring issues about your work environment to Human Resources, as our HR professionals will be in the best position to help resolve these issues.

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 set by the Compliance Hotline. We would rather you report anonymously than keep the information to yourself.

It is important to note that student academic or behavioral issues should be reported to the Dean of Students Office or the Judicial Affairs Office rather than through the Compliance Hotline.

Also, for employees, matters covered by the Collective Bargaining Agreement or individual contracts should be referred to Human Resources.

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

We all have the right to work and learn 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 entire university.

Does the university really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our university - 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 university and our people. Also, offering positive input may help identify issues that can improve culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the NAVEX Global secure server to prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within the university 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.

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

The Compliance Hotline system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical university. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and on campus and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a university 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?

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

If you feel uncomfortable making a report on your university PC, you have the option of using a PC outside the university environment (such as one located at an Internet café, at a friend's house, etc.) through the NAVEX Global secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports are generated during business hours.

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 Compliance Hotline system strips away Internet addresses so that anonymity is totally maintained. Plus, NAVEX Global is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide through the Compliance Hotline will ultimately reveal my identity. How can you assure me that will not happen?

The Compliance Hotline 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 Compliance 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.

Tips & Best Practices

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

Our university chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the university community, including you. You only have to consider what happened in recent scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy university. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and to all university members to report it.

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

File a report. The Compliance Hotline 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.

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

The Compliance 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.

As a student, what if one of my professors or other teachers are involved in a violation? Won't they get the report and start a cover-up?

The Compliance 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.

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

When you file a report at the Compliance Hotline Web site or through the Compliance Hotline Call Center, you receive a unique report key and are asked to choose a password. You can return to the Compliance Hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a university 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 university questions. You and the university 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 Compliance Hotline 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?

You can file a Compliance Hotline report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the Compliance Hotline toll-free number, which is available 24 hours a day, 365 days a year.