



# Promoting Ethical Stewardship

## ETHICS POINT HOTLINE

Catholic Charities of the Diocese of Arlington (CCDA) has taken a step to foster accountability, support of our clients, employees, and volunteers, and lessen the risk of unethical behavior by implementing an ethics hotline. This hotline is operated by EthicsPoint, an independent service provider well known in the business and non-profit community. EthicsPoint provides a confidential, anonymous mechanism for reporting concerns of suspected financial and human resource misconduct.

The use of this hotline eliminates any concern one may have about making such reports, as confidentiality is provided, and anonymity is offered to anyone who wishes. Reports to the hotline should be made in a good faith effort to address legitimate issues and concerns or to otherwise provide reliable information. All reports will be reviewed and responded to appropriately by a member of Catholic Charities Board of Directors or senior management that could include independent financial and audit experts.

Suspected sexual misconduct or child abuse by diocesan personnel while performing work of the diocese should be reported to the Victims Assistance Coordinator at 703-841-2530. The Ethics Point Hotline should not be used for employee misconduct of this type.

## FREQUENTLY ASKED QUESTIONS

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees and volunteers to work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating and ensuring a constructive, ethical and positive work environment.

### Why do we need a system like EthicsPoint?

- We believe that the employees and volunteers of Catholic Charities are our most important asset. By creating open channels of communication, we can promote a positive working environment and maximize our ability to effectively serve our clients and those in need.
- Organizations that are effective encourage the use of reporting systems that allow for reports of misconduct that are attributable to an employee, volunteer or agent and that provide for anonymous reporting of misconduct or violations of legal or regulatory requirements. That kind of reporting enables an organization to investigate quickly and address matters raised while protecting the reporting individual.

- An effective reporting system augments our efforts to foster a culture of integrity and ethical decision-making.

What groups of individuals are covered by EthicsPoint?

EthicsPoint covers all of those covered by the Code of Ethical Standards of Conduct established by Catholic Charities. Those individuals include members of the Board of Directors, employees, volunteers, and third parties subject to the control of the agency, i.e.. agents (“Covered Individuals”)

# Reporting – General

## **May I report using either the Internet or the telephone?**

Yes. With EthicsPoint, you can file a confidential, anonymous report via either the telephone or the Internet.

## **What type of situations should I report?**

The EthicsPoint system is designed for Covered Individuals, ie. employees, volunteers and agents, to report any violation of our stated Code of Ethical Standards of Conduct, or other concerns you may have that you believe require the attention of management or the Board of Directors.

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

When you observe some behavior that you believe violates our Code of Ethical Standards of Conduct, 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 that way. It is for those circumstances that we have partnered with EthicsPoint. We would rather you report anonymously 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 an environment that is characterized by honesty, integrity and ethical behavior. With that right comes the responsibility to act in a responsible manner and that includes the obligation of advising the appropriate people if you observe someone not acting appropriately. By working together, we can protect our working environment and insure that that is beneficial for every employee of the agency. Conduct that violates our standards not only affects the employees affected but also has the potential to damage the agency and the programs it offers to the poor and less advantaged. Protecting against that is every employee's business.

## **Does management really want me to report?**

YES - We certainly do. In fact, we need you to report. You know what is going on in our agency – both the good and the 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 clients we serve, its programs and most importantly our employees and volunteers. Also, offering positive input may help identify issues that can improve our culture, work environment and the performance and results of our programs.

## **Where do these reports go? Who can access them?**

When you file a report in your name or anonymously, it goes to the EthicsPoint server – NOT to Catholic Charities. That prevents any possible breach in security. EthicsPoint then makes the report available ONLY to specific individuals within the agency who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients are trained to keep any reports they receive confidential if possible.

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

NO. This system is not designed to spy on employees or volunteers or watch over them. In fact, the EthicsPoint system is totally positive in approach and wholly dependent on individuals initiating reports of wrongful or unethical conduct to insure that we can all enjoy a safe, secure and ethical workplace. It's designed to encourage you and other employees or volunteers to seek guidance on ethical dilemmas, provide positive suggestions, or communicate concerns about inappropriate conduct. Effective communication is critical in today's workplace and this is a great tool to enhance that communication and your role in supporting a positive and ethical work environment.

# Reporting Security & Confidentiality

**It is my understanding that any report I send from an agency computer generates a server log that shows every web-site that my PC connects with. Won't this log identify me as a report originator?**

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

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

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

Absolutely. 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 EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, as noted earlier, EthicsPoint is contractually committed not to pursue a reporter's identity.

**I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. Can you assure me that will not happen?**

The 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 EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them.

**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 to report it?**

Catholic Charities operates at the highest levels of propriety and ethical behavior as it strives to serve the poor and those in need. It is what we stand for and how we operate in the communities we serve. As such, any unethical behavior or conduct that violates the law – at any level- would damage our reputation and the reputation of our employees and volunteers – including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy organization. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues to report it.

**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?**

When in doubt - file a report. EthicsPoint 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 or inappropriate conduct go unchecked because you weren't sure.

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

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. So, actions to cover up a violation are not likely. In addition, regardless of whether you file the report under your name or anonymously your identity will be protected in the investigative process. Any form of retaliation is strictly forbidden.

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

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by an agency representative investigating the matter 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 any questions the agency might pose. You and Catholic Charities now have entered 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?**

YES- Absolutely. All EthicsPoint correspondence is 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 an EthicsPoint report from any computer that can access the Internet. You can file from home or public locations, like a public library, that have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year. **That number is 1-844-936-0727.**