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## **About FDR Cares**

#### What is FDR Cares?

FDR Cares is a comprehensive and confidential reporting tool created by NAVEX Global to assist students, faculty, staff, employees, management and the entire community to work together in addressing fraud, abuse, and other misconduct in the school community, all while cultivating a positive environment.

#### Why do we need a system like FDR Cares?

- We believe that our community members including our staff members are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- An effective reporting system will augment our open communication 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 FDR Cares, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

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

The FDR Cares system is designed for community members including employees to report any violation of our stated Codes of Conduct or other concern you may have. The categories of reporting are:

- Accounting, Auditing and Internal Financial Controls
- Bullying
- Conflict of Interest
- Discrimination
- Embezzlement
- Environmental Protection, Health or Safety Law
- Improper Giving or Receiving of Gifts
- Improper Supplier or Contractor Activity
- Inappropriate Use of Technology
- Misconduct or Inappropriate Behavior
- Sexual Harassment
- Student Safety
- Substance Abuse
- Theft
- Unsafe Working Conditions
- Vandalism
- Violence or Threat
- Other

If I see a violation, shouldn't I just report it to the school principal or superintendent, my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our codes of conduct, we expect you to report it. Yes, ideally, you should bring any concerns forward to your teacher, the principal, the superintendent, your direct manager or other member of our leadership team. 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 partnered with NAVEX. 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 go to school or 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 healthy and productive environment. Misconduct can threaten the success of an entire community.

#### Does leadership really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in our community - both good and bad. Misconduct can threaten the success of our community. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the Roosevelt community. Also, offering positive input may help identify issues that can improve our community culture and performance.

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

Reports are entered directly on the NAVEX secure server to prevent any possible breach in security. NAVEX then forwards these reports only to specific individuals within the school 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. The individual reporter remains anonymous throughout the whole process.

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

The FDR Cares system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical community. You are encouraged to seek guidance on ethical dilemmas or communicate a concern. Effective communication is critical and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to maintain a positive school environment.

# **Reporting Security & Confidentiality**

It is my understanding that any report I send from a computer generates a server log that shows every website that my computer/device connects with. Won't this log identify me as a report originator?

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

#### 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 FDR Cares system strips away Internet addresses so that anonymity is totally maintained. Plus, FDR Cares is contractually committed not to pursue a reporter's identity.

# I am concerned that the information I provide FDR Cares will ultimately reveal my identity. How can you assure me that will not happen?

The FDR Cares 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, "My best friend 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 FDR Cares Web site. These reports have the same security and confidentiality measures applied to them during delivery.

#### Is the telephone call toll-free from Peru?

Yes, when you file a report by telephone, you will be provided with an access code to a toll-free line in the United States.

#### 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?

Colegio Roosevelt chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the school and entire community, including you. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your community to report it.

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

Report this using the open communications channels or file a report on FDR Cares. FDR Cares 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.

What if my supervisor is involved in a violation? Won't they get the report and start a cover-up?

The FDR Cares system and report distribution are designed so that implicated parties are not 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 FDR Cares has further questions for me concerning my report?

When you file a report at the FDR Cares Web site or through the FDR Cares Call Center, you receive a unique user name and are asked to choose a password. You can return to the FDR Cares system again either by Internet or telephone and access the original report to add more detail or answer questions posed by an FDR Cares representative and add further information that will help resolve open issues. You will have 30 days in which to add more details or amend a report. We strongly suggest that you return to the site in the time specified to answer FDR Cares questions. You and FDR Cares 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 FDR Cares 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 an FDR Cares report from any computer that can access the Internet. If you don't have access to or are uncomfortable using a computer, you can call the FDR Cares hotline, which is available 24 hours a day, 365 days a year.