

# About EthicsPoint

## What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment.

## Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity
- An effective reporting system augments our other efforts to foster a culture of integrity and accountability

## Reporting – General

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

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

### What types of situations should I report?

The EthicsPoint system allows employees to report any violation of our stated Code of Conduct, or other concern you may have.

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

Stamford Health is committed to fostering a fair and just culture of trust in which employees are encouraged to report suspected violations. We want you to feel comfortable in approaching your supervisor or leadership in instances where you believe violations of policies or standards have occurred. In situations where you prefer to make a confidential anonymous report, you can use the EthicsPoint hotline, which is hosted by a third-party provider.

### Why should I report what I know?

Stamford Health promotes a culture of fair and just accountability, which is a culture of trust in which employees are encouraged to, and ultimately feel comfortable reporting suspected violations. In a fair and just culture there is a distinction between intentional misconduct and human errors caused by system issues. The organization seeks to balance a non-punitive learning environment with one in which staff are held accountable for their actions. Note, those who report issues in good faith will be protected from retaliation.

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

Yes. In fact, we *need* you to report. You know what is going on in our organization - 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 organization and our patients. Also,

offering positive input may help identify issues that can improve corporate culture and performance.

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

Reports are entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available only to specific individuals within the company 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.

### **What happens to my compliance report?**

The report is sent to the Compliance Department to initiate an appropriate inquiry or investigation. Reports that are outside of the purview of the Compliance Department's responsibilities will be addressed and coordinated in conjunction with the appropriate administrator or leadership representative.

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

No. EthicsPoint is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. 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 this is a great tool to enhance that communication.

### **How can I contact the Compliance or Privacy Team directly?**

Call or email the Stamford Health Compliance Officer at (203) 276-7533 or [ComplianceQuestions@stamhealth.org](mailto:ComplianceQuestions@stamhealth.org). Call the Privacy Hotline at (203) 276-4108 or [Privacy@stamhealth.org](mailto:Privacy@stamhealth.org).

## **Reporting Security & Confidentiality**

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

NAVEX Global does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment through the EthicsPoint 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 EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

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

The EthicsPoint system protects 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 unintentionally. 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 during delivery.

**What if I want to be identified with my report?**

There is a section in the report to identify yourself, if you wish.

## **About the Safety Hotline**

**What is the Safety Hotline?**

Stamford Health launched a Safety Hotline. This confidential external hotline will accept reports about safety concerns 24 hours a day/7 days a week. Our purpose in implementing this hotline is to provide a way for the entire Stamford Health community to become involved in our safety program.

**Who can call?**

Anyone, including patients, families, vendors, employees, and physicians. The goal is to improve the safety environment for patients, families and employees and to decrease harm.

**What type of concerns can be reported?**

- A potentially unsafe situation
- Potentially hazardous conditions
- Harm to the health and safety of employees, patients, or visitors
- Lack of follow-up to previously reported concerns
- May be related to patient care, facilities, equipment use, and chemicals

**Is it available in other languages?**

Operators are available in over 100 languages.

**What happens to my report?**

The report is sent to the Risk Management and Security departments for initial review and investigation. Follow-up may be required by another department.

## **Can I remain anonymous when I call the Safety Hotline?**

Absolutely. The Hotline accepts anonymous reports.

## **If I make an anonymous report, how do I learn about the outcome?**

The operator will provide a report number and a call-back number. A response will be available on the Safety Hotline within 10 days of the report. After you call back with the report number, the organization's response will be read to you. For non-anonymous reports, we can advise you directly about the follow-up to your report.

## **What benefits do we expect from the Safety Hotline?**

- Decreased harm and injuries.
- Increased culture of safety.
- Increased patient and employee satisfaction.
- Increased reporting.
- Sharing of best practices across the organization to improve safety and decrease harm.

## **Who can I call with questions about the Safety Hotline?**

Contact Ruth Cardiello at 203.276.2526 or email: [rcardiello@stamhealth.org](mailto:rcardiello@stamhealth.org).

## **Tips & Best Practices**

### **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?**

File a report. NAVEX Global 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 unsafe or unethical behavior go unchecked.

### **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 ensure 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 company 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, randomized number called a "Report Key" 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 a company representative. We strongly suggest that you return to the site in the time specified to answer company questions.

You and the company 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 EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

**What if I lose my Report Key or forget the Password I created?**

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

**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. 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 EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.