

# Questions and Answers About EthicsPoint

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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist employees, students, or members of the general public in reporting suspected compliance concerns and incidents at our campus using either the hotline website or telephone. The hotline is supported by a reporting tool that was created by a third-party service provider, Navex Global. EthicsPoint serves as an intermediary between the reporter and the respective Olin College campus official receiving the report. Therefore, reported information is held securely and confidentially on Navex Global's systems. Reports can be filed anonymously to protect the identity of the reporting employee, student, or member of the general public.

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

At Olin, we encourage all employees, students, and volunteers, acting in good faith, to report suspected legal, regulatory or policy misconduct or other concerns through EthicsPoint. Ideally, you would bring any concerns forward to your Student Life official, direct supervisor, Human Resources office or other appropriate Olin College campus official. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. We would rather you report anonymously than keep the information to yourself.

In addition, Federal guidelines for compliance programs include establishment of a channel of communication that permits anonymous reporting of potential regulatory compliance problems and concerns.

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

When you observe some behavior that you believe violates our policies, 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 this manner. It is for such circumstances that we have partnered with NAVEX Global. We would rather you report anonymously than keep the information to yourself.

### What about reprisal or retaliation for making the report?

No individual who reports suspected legal, regulatory, or policy violations in good faith will suffer harassment, threats, or adverse employment or education consequences solely because a report was made through EthicsPoint. Any person who retaliates against any individuals because they made a report may be subject to disciplinary action, up to and including termination or expulsion.

# Reporting – General

## What type of situations should I report?

EthicsPoint is designed for faculty, staff, students, and the general public to report suspected legal, regulatory or policy misconduct and other concerns in the following areas:

- Accounting and Financial
- Athletics
- Discrimination or Harassment
- Health and Safety
- Human Resources
- Information Security and Technology and
- Research.
- Title IX and Sexual Misconduct

EthicsPoint is not to be used for reporting student academic matters which should be reported directly to the campus' academic affairs or student affairs offices.

## I'm not sure if what I've observed or heard is a violation of law, regulation or policy, but it just doesn't look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless than let possible violations go unchecked because you were not sure.

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

Reports entered through EthicsPoint are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the organization who are charged with evaluating the report, based on the type of violation at Olin College campus where the incident occurred. Each of these report recipients has had training in keeping these reports in the utmost confidence.

## What happens after a report is filed?

EthicsPoint notifies the designated Olin College official that there is a report posted to a secure access site on the EthicsPoint system. The Olin College official reviews the report and begins the process of determining the facts and any appropriate action.

In some cases, no action will be taken. For example, anonymous reports must have sufficient corroborating evidence to justify the commencement of a review.

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

When you file a report at the EthicsPoint website or through the call center, you receive a unique username and are asked to choose a password. You can return to EthicsPoint again either by the hotline website or telephone and access the original report to provide additional information or answer questions posed by a college official. We strongly suggest that you return to the site in the time specified to answer follow-up questions.

### **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.

## **Reporting – Security and Confidentiality**

### **Are anonymity and confidentiality guaranteed?**

We cannot guarantee either anonymity or confidentiality, but EthicsPoint is designed to provide maximum potential for both. In some situations (e.g., research misconduct), substantive investigation of a complaint may not be possible unless the reporter is willing to waive anonymity.

### **It's my understanding that any report I send from a college computer generates a server log that shows every website that my PC connects with, and 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, as EthicsPoint'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?**

EthicsPoint's experience has been that fewer than 12% of reports are generated during business hours. Most people prefer to report from the comfort of their home after hours and on the weekend.

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, EthicsPoint is contractually committed not to pursue a reporter's identity.

### **Is the toll-free telephone line confidential and anonymous too?**

EthicsPoint reporting service is also operated by EthicsPoint and is available toll-free at 855-753-0486, 24 hours a day, 365 days a year. The caller will be asked to provide the same information that he or she would provide in a web-based report. EthicsPoint safeguards reports received through the telephone just as it does those received through the Internet.

### **I'm concerned that the information I provide through EthicsPoint will ultimately reveal my identity. How can you assure me that won't 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 ..." If the reporter is the only individual who could possibly know the reported facts, there may be an unintended deductive disclosure of the reporter's identity. EthicsPoint will honor and protect the reporter's request for confidentiality to the extent possible as it fulfills its obligations in responding to the report.