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About EthicsPoint

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?

- MCC relies on our employees and volunteers to carry out our mission. By creating open channels of communication, we promote transparency and a positive work environment.
- In addition to being accountable to our employees, MCC is accountable to our partners, program participants, constituents and donors. The EthicsPoint system allows anyone to report concerns about individuals representing MCC or MCC-supported programs.
- An effective reporting system strengthens our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

Who can make a report?

MCC's Speak Up Service is publicly available for anyone to use to report concerns related to MCC, our staff or our partners implementing MCC-supported programs. This includes MCC employees, volunteers, board members, contractors, consultants, interns, partner staff, program participants, constituents, donors and community members.

We encourage MCC employees to follow regular reporting channels and to bring concerns forward to your manager, director, HR coordinator or focal point. 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, especially if it is just a suspicion or concern?

Staff misconduct, mismanagement of resources and abuses of power by anyone representing MCC or MCC-supported programs are a violation of the trust that individuals and communities place in MCC. If you have a suspicion or concern that misconduct or abuse has happened, it is not your job to look into the concern or investigate further. Rather, speak up and report your concern so that people in MCC with expertise can respond appropriately and prevent further harm from occurring.

Should I provide my contact information or report anonymously? Why would I make an anonymous report?

When you report a concern we encourage you to include your name and contact information so that we can reach out to you if we have questions and to provide follow-up (including support if you have been harmed).

We understand that in some cases anonymity makes the difference between reporting a concern or not. We are pleased to be able to offer this option through our use of the EthicsPoint system. How anonymous your submission is will be up to you.

When you make a report you will have the option of choosing to submit it without entering any identifying or contact information, and you are in control of what you share about your concern. To ensure maximum anonymity, do not include identifying information or details in your report. Do not include contact information or make the report from your work device. If you choose to submit an anonymous report, we will not be able to contact you directly (because we won't know who you are), however we encourage you to write down the "Report Key" you will receive and your password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to anonymously add more detail or answer follow up questions from an MCC representative.

Choosing to make an anonymous report is a very personal choice as you weigh how many details or identifying pieces of information to include (to enable a more thorough response) vs. protecting your anonymity (which may limit some of the actions we can take). This is an

assessment only you can make. We are committed to following up with your report to the extent we are able.

MCC recognizes that individuals may find it difficult to come forward with a report because of concerns of confidentiality or retaliation. As you make your decision about whether to provide your name or to report anonymously, please know that all reports will be treated as confidentially as possible. Retaliation against any person for making a report is absolutely prohibited and subject to disciplinary action.

How will MCC follow up with anonymous reports?

MCC will follow up with anonymous reports to the extent we are able. However, sometimes MCC is unable to take further actions if the information is insufficient or if there are legal limitations to following up with anonymous reports. Even when MCC is unable to take further action on the concern, MCC will file the concern and use it for tracking related patterns and for general learning and improvement.

What if I want to be identified with my report?

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

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific, trained individuals within MCC who are charged with evaluating the report and ensuring the proper person manages the response based on the type of violation, severity and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence. Our response is guided by our established policies and procedures. For concerns involving harassment, exploitation, abuse or discrimination or any cases involving MCC personnel, the relevant Director of Human Resources will oversee the case. For fraud or mismanagement of resources, the relevant Director of Financial Services will oversee the case (with involvement by the relevant Director of Human Resources if it involves MCC personnel).

What if my boss or other managers in Human Resources or Financial Services 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. In the event that the relevant director who would normally oversee the case is implicated in the case, MCC has a system for appointing a different manager to oversee the case. There is also counter-check system in place that ensures at least two people view a report to ensure that no one person is in complete control of all the information.

What if I remember something important about the incident after I file the report? Or what if MCC 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 an MCC representative. We strongly suggest that you return to the site in five to six days to answer follow up questions. These follow-ups on reports are held in the same strict confidence as the initial report, under the umbrella of anonymity (if you choose to report anonymously).

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 & Confidentiality

It is my understanding that any report I send from a work 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 does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

We encourage MCC staff who wish to remain completely anonymous to make a report using a non-work computer or phone, on a non-work internet connection. Per our technology use policy, when you use a work device, internet or phone MCC has the right or ability to know what sites you visit. MCC can't tell what you wrote in a report to NAVEX or what you said during a phone call, but we may be able to see that you visited the site or placed a call to the NAVEX reporting line.

Is the telephone reporting 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.

If MCC investigates a report that includes the reporter's contact information, how does it stay confidential?

All reports will be treated as confidentially as possible. MCC's obligation to conduct an investigation into the alleged complaint may require limited disclosure with the goal of maintaining as much confidentiality as possible. If an investigation is required to gather more information, the case management team responding to the report will identify the risks related to confidentiality and put measures in place to prevent the disclosure of information to individuals not directly tasked with responding to the report. All investigations will be conducted discretely, taking into account the confidentiality and safety of all involved parties.

MCC's Whistleblowing Policy (Policy 7412: "Reporting Illegal, Unethical or Other Inappropriate Behavior") prohibits retaliation, harassment or adverse consequences against staff who bring forward a concern in good faith, even if an investigation finds the concern to be unsubstantiated. MCC applies the same principles to partners, program participants and others who bring forward concerns. MCC is committed to analyzing risks and taking actions to reduce the risk of retaliation to the reporter and everyone involved.