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About EthicsPoint

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and ensure our compliance with all laws, regulations, and policies.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.
- Although we encourage employees to report their concerns directly to their supervisor or to the relevant department overseeing compliance (for example, Equal Opportunity, Affirmative Action, and Disability Services, HR, Vanderbilt Environmental Health and Safety, Division of Finance, or the Office of Animal Welfare Assurance. For more information see <http://www.vanderbilt.edu/compliance/links.php>), we understand that there are circumstances in which you might not be comfortable making such a report. This reporting system provides an option which allows you to provide information with total anonymity.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, 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 EthicsPoint system is designed for employees to report any violation of Vanderbilt's Standards of Conduct or other policies, or any other concern you may have.

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

When you file a report at the EthicsPoint website 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 a University representative 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. You and the University now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

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

Yes. When you observe some behavior that you believe violates the law or the Standards of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, other members of management, or the office overseeing the relevant area of compliance. We recognize, however, that there may be circumstances in which you are not comfortable reporting the issue in this manner. It is for such 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 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 entire institution, as well as threaten the safety of the entire campus community.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. We can't fix what we don't know about. You may have initial knowledge of an activity or situation that may be cause for concern. Your reporting can minimize the potential negative impact on the University, our employees, faculty and students. Also, offering positive input may help identify issues that can improve our culture and performance.

Where do these reports go? Who can access them?

Reports 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 Vanderbilt 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.

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

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace and campus community. You are encouraged to seek guidance on ethical dilemmas, provide suggestions for improvement, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a University computer generates a server log that shows every web-site 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 of campus 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?

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.

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 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 website. 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 for identifying yourself, if you wish. Vanderbilt will keep your identity as confidential as possible.

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?

Vanderbilt University chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the University, the campus community and all employees, including you. You only have to watch or read the news online 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 coworkers to report it.

I am not sure if what I have observed or heard is a violation of the law or Vanderbilt policy, or involves unethical conduct, but it just does not 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'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure. If the conduct does not violate any law or policy, Vanderbilt will enter an explanation in the system so that you can understand why it was not improper. EthicsPoint will give you a method by which you can later check back for messages while maintaining your anonymity.

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 are designed so that implicated parties are not notified or granted access to reports in which they have been named. Your boss or manager may be questioned if necessary, but they will never see your report.

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.

Can I still file a report if I don't have access to the Internet?

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. 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.