

East Georgia State College Ethics and Reporting Hotline Procedures

Overview: East Georgia State College recognizes that an ethical, efficient, and effective work environment is essential to our continuing to successfully accomplish our mission. As a result, we have always placed a high priority on assuring that each member of our college community has the opportunity and means to convey any matter that could compromise that environment. Reporting through your supervisory chain frequently produces the most thorough and timely resolution of a matter and is encouraged. However, other reporting avenues, such as Public Safety, Business Affairs, and Legal Affairs, have been and continue to be readily available. In keeping with our efforts to expand alternatives for reporting matters of significance, reporting through a service provided by NAVEX, an independent company, is available 24 hours a day, 7 days a week. The service allows faculty, staff, students and visitors the option to voice concerns, and to remain anonymous if so desired. Complaints may be made by phone via a toll free number or via on-line reporting at www.ega.edu/hotline. To publicize this program, all new employees receive a wallet card and brochure with The Hotline program information during New Employee Orientation. Posters are posted in several prominent locations in each EGSC building.

Case Management: Contact Information and Updates

The Chief of Staff and Legal Counsel is responsible for managing The Hotline. The Vice President for Business Affairs is the billing contact for The Hotline. Complaints that escalate to an emergency level go immediately to the Emergency Contacts: Chief of Campus Security; Vice President for Business Affairs, and Chief of Staff and Legal Counsel. Non-emergency complaints go through a triage conducted by the Executive Report Recipients Team who receive notice of all complaints and can access all stages of a complaint through resolution and follow up. The Executive Report Recipient Team is the Chief of Staff/Legal Counsel, Vice President for Business Affairs, and Internal Auditor.

The list of users with access to the case management system is regularly updated to reflect new hires, terminations and changes in job responsibilities. New users are required to participate in NAVEX's on-line training.

User Levels

NAVEX provides users with tools to manage their incidents from notification, to investigation and through to resolution. In the Case Management system, all actions taken by users during the incident investigation and resolution process are automatically documented in the Case Log and tagged with a date, time and user ID stamp. A three tier hierarchy ensures that only those authorized to assign and investigate reports have access to that data, maximizing the protection of confidential information. The three user types are:

Executive Report Recipients: Executive Report Recipients have the ability to view all of the incidents in their incident categories across all locations. They also have the same capabilities as and can be Case Managers, as described below. Executive report recipients are typically high level officials that may have oversight over the program, but no day-to-day responsibilities. Executive report recipients have all the rights of a Case Manager, and can see every incident report across all categories. EGSC Executive report recipients are shown in the table attached.

Case Manager: Case Managers will manage incident reports from notification to investigation and through to resolution. Case Managers can only see and assign their incident reports within their incident category type(s). For example, the Case Manager for Financial Matters will only receive incident reports involving financial matters. Case managers will have the same rights as and can also be Investigators. Please see list of EGSC Case Managers in the attached table.

Investigators: Investigators are responsible for investigating incident reports assigned to them by the Case Manager(s). Investigators can only see incident reports assigned to them by their Case Manager. For example, an individual in internal audit would be assigned a specific incident report to investigate. They would be assigned the report by the Case Manager for Financial Matters. Please see list of EGSC Investigators in the attached table.

How Cases Are Assigned

All reports, questions, comments and suggestions filed with The Hotline will be date and time stamped, and forwarded by the Hotline to the appropriate Executive Report Recipients according to incident type to ensure that the matter can be properly addressed. Within 24 hours of receipt, the Case Manager will assign the matter to an Investigator within the appropriate department for investigation. This assignment will occur via The Hotline's on-line reporting system to ensure documentation of the receipt, investigation and resolution of the matter in a central location with joint access afforded the Case Manager and Investigator. The Case Manager must monitor the investigation of the matter and provide reminders to the Investigators, if needed, to ensure swift resolution. EGSC's goal is to have all matters resolved in as quickly a manner as is possible, providing prompt and thorough communication to the complainant at all times, with timely documentation provided in the on-line report.

Investigation Procedures

Upon receipt of the report, question, comment, and /or suggestion by the Case Manager, an evaluation will be conducted to determine the critical or non-critical nature of the complaint, question, comment and/or suggestion. If additional information is needed to investigate the matter, the Case Manager will direct the assigned Investigator to obtain this information from the complainant. If the missing information could have been obtained from the caller/complainant at intake, the Case Manager will request a modification to the Hotline program to allow additional questions be asked in response to the incident, and will provide such relevant questions as needed.

Each incident will be assigned an Investigator and a timeframe for response and final resolution that is appropriate for the matter under investigation. Investigators are expected to abide by the response and resolution deadlines, document all case information in the NAVEX on-line reporting system and to maintain clear and regular dialogue with his or her Case Manager on the status of the investigation. Case Managers have access to the Investigator's on-line notes and case information, and responsibility for reviewing and approving the investigation results.

Tracking Complaints

EGSC will analyze all complaints to track and monitor trends or problem areas that may need focused management attention. Tracking of complaints will occur among offices and in particular subject areas. EGSC will provide additional controls, expanded policies or procedures or additional management review if needed. All EGSC personnel will be notified that retaliation by an employee that is the subject of a complaint is strictly prohibited and may subject the employee to termination and possible legal action.

USG Compliance and Ethics Program will be consulted as needed, about appropriate responses to a Hotline complaint. Any complaint and investigation about a USG President, or Vice President will be overseen by the University System of Georgia Office of Internal Audit for investigation.