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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.

This document sets forth a reporting mechanism for complaints; however, depending on the nature of the complaint, additional East Georgia State College policies may detail the exact process to follow for investigation and resolution of a specific complaint. Title IX complaints will be reported as outlined in the East Georgia State College *Sexual Harassment Policy* and will be investigated according to the process outlined in the East Georgia State College *Discrimination and Harassment Policy*.

Confidentiality Statement: All employees involved with a Hotline complaint are accountable and responsible for maintaining confidentiality. Due diligence and reasonable care must be exercised when handling confidential information. Employees involved in a Hotline complaint should not discuss the matter with anyone outside their reporting chain, should not send e-mails containing confidential information concerning this incident, should take measures to secure the investigative file so that its contents cannot be accessed by others and should not report on or release any information about the incident to internal or external parties without permission from the Office of Legal Affairs.

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 are immediately transmitted by Hotline operators to the Chief of Campus Security. Non-emergency complaints are transmitted to the Incident Report Review Team comprised of the Chief of Staff and Legal Counsel, Vice President for Business Affairs, and Internal Auditor. Each receives a copy of the incident report and can access all stages of an incident in the case management system through resolution and follow up. 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 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 incidents have access to that data, maximizing the protection of confidential information. (See *Case Management User Roles*, attached) 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. Each member of the Incident Report Review Team is an Executive Report Recipient.

Case Manager: Case Managers will manage incident reports from notification to investigation and through to resolution. Case Managers can view and assign their incident reports within their incident category type(s), and in limited instances, may be granted access to incident reports outside their category type. For example, the Case Manager for Financial Matters will typically only receive incident reports involving financial matters. Case managers will have the same rights as and can also be Investigators.

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 the Business Office may be assigned a specific incident report to investigate. They would be assigned the report by the Case Manager for Financial Matters.

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 Incident Report Review Team according to incident type to ensure that the matter can be properly addressed. Within 48 hours of receipt, the Team will meet and evaluate each incident to avoid conflicts of interest, and assign the case to an Executive Report Recipient. The Executive Report Recipient may further assign the matter to a Case Manager within the appropriate department for investigation. The Case Manager may further assign to an Investigator. Case assignments 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 access afforded the Executive Report Recipient, Case Manager and Investigator. The Executive Report Recipient and/or 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, the Case Manager will evaluate to determine the critical or non-critical nature of the complaint, question, comment and/or suggestion. 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. 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 possible or request a communication with the caller in the case management system and post such questions for the caller to respond. Case Managers have access to the Investigator's on-line notes and case information, and responsibility for reviewing and approving the investigation results.

Investigation Outcomes and Actions

If an investigative report reveals that an employee has violated a policy or policies of the College or of the Board of Regents, or violated city or county ordinance or state or federal law, that an employee or unit needs training on a particular topic, policy or procedure, or any other corrective action is recommended, the matter will be referred to the Director of Human Resources. In such instances, the employee and his or her supervisor will meet with Human Resources to review the matter and plan the corrective action(s) for the employee and/or unit. The Director of Human Resources will communicate the planned corrective action and inform the investigator when the corrective action has been completed. The investigative report will reflect the completion date of the corrective action.

If an investigation reveals that a student has violated the Student Code of Conduct, the investigator's report will reflect this and the matter will be referred by the investigator to the Student Conduct Officer.

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 staff 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.