

ETHICS HOTLINE

POLICY NUMBER: ADM-ETHICSHOTLINE

RESPONSIBLE OFFICIAL TITLE: VICE PRESIDENT FOR LEGAL AFFAIRS & GENERAL COUNSEL

EFFECTIVE DATE: XX/XX/XXX

NEXT REVIEW DATE: APPROVAL PLUS FOUR (4) YEARS – XX/XX/XXX

SUPERSEDES POLICY DATED: N/A – NEW POLICY

BOARD OF REGENTS REPORTING: PRESIDENTIAL REPORT

I. POLICY STATEMENT

As a public institution entrusted with a mission of higher education and service to our region, Northern Kentucky University is committed to meeting the highest standards of ethical conduct, professionalism, and integrity in its operations.

To help meet this commitment, the University maintains an anonymous ethics reporting hotline – known as EthicsPoint – through which it may receive reports of potential misconduct and other concerns. Although such concerns typically should be reported to a supervisor, Human Resources, or other relevant offices, in cases where the reporter wishes to remain anonymous or in other appropriate circumstances, the individual may make an anonymous report via EthicsPoint.

This policy governs assessment and resolution of reports submitted through EthicsPoint.

What is EthicsPoint?

EthicsPoint is an anonymous ethics reporting system used by the University to receive and evaluate reports of potential misconduct and other concerns. EthicsPoint is hosted by a third-party vendor on a non-university website.

What may be reported via EthicsPoint?

An individual may report a wide variety of concerns via EthicsPoint, including known or suspected violations of law or University policy, unethical actions, misconduct, and other wrongdoing.

Examples of conduct that may be reported via EthicsPoint include discrimination, harassment, fraud, theft, waste, financial malfeasance, conflicts of interest (e.g., financial, nepotism), non-emergency unsafe conditions and safety concerns, unethical behavior, and research misconduct.

Known or suspected criminal activity should be reported to the Northern Kentucky University Police Department or other appropriate law enforcement agency. Health/safety emergencies should not be reported via EthicsPoint.

How is a matter reported using EthicsPoint?

There are two options for reporting a matter using EthicsPoint. First, a reporter may go to inside.nku.edu/ethics, click “Ethics & Compliance Helpline,” and then click “Make A Report.” Alternatively, a reporter may report by phone at 855-597-4539. Both options are available 24/7, subject to infrequent vendor IT outages.

Upon submitting a report, the individual will receive a Report Key and be invited to create a corresponding password.

A reporter should retain the Report Key and password, as the reporter will need it to log back into the EthicsPoint platform to receive follow-up messages and provide additional information regarding the report.

Because the University does not operate the EthicsPoint platform, the University does not have access to the Report Key and user-provided password.

Can EthicsPoint reports be made anonymously? Will the reporter's identity be kept confidential?

EthicsPoint reports may be made anonymously. Because EthicsPoint is hosted by an outside vendor, the University cannot access connection logs, IP addresses, or other metadata that may identify a reporter. The only identifying information that the University can view is information voluntarily provided by the reporter in the submission.

Anonymity is critical to the usefulness and integrity of the EthicsPoint process. If a report is made anonymously, then the University will not investigate or pursue the identity of the anonymous reporter.

If a reporter wishes to do so, the reporter may make the report non-anonymously and may provide contact information. In those cases, the University will take reasonable steps to maintain the confidentiality of the reporter's identity. However, in some cases, and only when volunteered by the reporter, the identity of the reporter may be shared with other appropriate University offices as necessary to facilitate assessment, investigation, and resolution of the report.

Who has access to review EthicsPoint reports?

EthicsPoint reports are accessible to only the General Counsel and designees within the Division of Legal Affairs and Financial and Operational Auditing. At least three University employees in the division will have access to view EthicsPoint reports.

Does the University protect reporters from retaliation?

Yes, the University prohibits retaliation against any individual due to the individual's making a good faith report of possible violations of law or policy, unethical behavior, or other misconduct or wrongdoing. This protection extends to reports via EthicsPoint. Retaliation also is prohibited against employees who provide truthful information during investigations of reports.

University employees who engage in prohibited retaliation will be subject to disciplinary action, including termination, in accordance with University policies and processes.

What happens after an EthicsPoint report is submitted?

After a report is submitted, the General Counsel and/or designees will review and make an initial assessment of the report. **All EthicsPoint reports are promptly reviewed.** Thereafter, the General Counsel and/or designee will take additional steps based on the nature and subject matter of the report and specific requirements of relevant laws or policies. Those steps may include collection and review of University records, review of relevant policies, and interviews with employees who may have

knowledge of the issues. The General Counsel and/or designee also may communicate with the anonymous reporter via EthicsPoint.

Reports also may be shared with other University offices as necessary to assess, investigate, and resolve them. When a report raises issues that are within the authority of another University office, the report will be referred to that office for further action consistent with applicable policies (e.g., employment discrimination complaints typically will be referred to Human Resources for investigation).

When necessary as part of disciplinary or corrective employment processes, relevant information from reports also may be shared with the individual(s) named in the report, in order to protect the rights of those employees. However, information that could be used to identify an anonymous reporter first will be removed to the extent possible.

If a report does not contain enough information to proceed, the reporter will be asked to provide additional information through the platform. Reports may be closed if sufficient information is not provided.

Is the reporter able to have anonymous follow-up communications with the University after the report is submitted?

Yes. If the reporter retains the Report Key and password, the reporter will be able to log into the EthicsPoint platform at any time to send and receive messages and provide additional information.

Reporters are encouraged to log into the EthicsPoint platform approximately ten days after submitting a report, in case further information is requested. In some instances, the University may not be able to fully investigate reports without additional information from the reporter.

How long does it take to resolve an EthicsPoint report?

The time needed to resolve a report depends on the complexity and nature of the relevant allegations, policies, offices, and issues. Most routine reports are resolved within three to five weeks.

Will the reporter learn about the outcome of the report?

The primary benefit of EthicsPoint is that it offers an anonymous way to raise ethics and other concerns to University leadership. Unlike other University complaint processes, EthicsPoint is not intended to provide a remedy specifically for the complaining individual, who typically chooses to remain anonymous. Thus, depending on the nature of the report, a reporter may not be informed of resulting outcomes. For example, a reporter typically will not be informed of disciplinary or corrective action taken with respect to other University employees.

However, a reporter will be informed via EthicsPoint when the report has been resolved by the University, along with other information that is appropriate to share.

If a report alleges misconduct by someone who is authorized to review the reports themselves, how is that conflict of interest managed?

The EthicsPoint platform includes an automatic feature ensuring that reports are not routed to an individual who is mentioned in the report.

If an EthicsPoint report alleges misconduct by one of the individuals who is responsible for reviewing those reports, then that individual will be prohibited from participating in or influencing the assessment, investigation, resolution or any other aspect of the EthicsPoint process for that report. In those cases, senior University leaders will collaborate to enforce this restriction and ensure appropriate oversight of the process.

II. POLICY INTERPRETATIONS AND ENFORCEMENT

The General Counsel has the authority to interpret and enforce the requirements and terms described in this policy.

III. REFERENCES AND RELATED MATERIALS

Related Policy

[NKU's Values and Ethical Responsibilities policy](#)

Revision History

REVISION TYPE	MONTH/YEAR APPROVED
New Policy	

ETHICS HOTLINE

PRESIDENTIAL APPROVAL

President

Signature

Date

Cady Short-Thompson

BOARD OF REGENTS APPROVAL

BOARD OF REGENTS (IF FORWARDED BY PRESIDENT)

- This policy was forwarded to the Board of Regents on the **Presidential Report (information only)**.
Date of Board of Regents meeting at which this policy was reported: ____/____/____.
- This policy was forwarded to the Board of Regents as a **Presidential Recommendation (consent agenda/voting item)**.
 - The Board of Regents approved this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing approval of policy.)
 - The Board of Regents rejected this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing rejection of policy.)

SECRETARY TO THE BOARD OF REGENTS

Signature

Date

Tammy Knochelmann