

Ethics and Compliance Hotline Guidance

The University Compliance Office receives reports through the Ethics and Compliance Hotline and by email. Ethics and Compliance reports are confidential and should be disclosed only to individuals who take action on the report and/or have a business need related to the report.

Please review the Ethics and Compliance report and any additional information provided by the University Compliance Office. Where we have identified a potential need, we have included a Human Resources representative for guidance. When your review and response to the report concludes please provide confirmation to the University Compliance Office and include (as relevant) your determination(s) and outcome(s). There is no requirement that your confirmation conform to the provided **Sample Report Response Template** however you may find its structure helpful.

Confirmations which are thorough and complete include:

- A summary of the inquiry/investigation or an explanation of why an inquiry/investigation was not conducted.
- Relevant information such as names of individuals interviewed/consulted; dates individuals were interviewed; documents reviewed, and/or how each allegation in the report was addressed if multiple concerns were identified.
- Determinations/findings and outcomes.
- Which policy/policies were violated, or an indication that no policy/policies were violated.
- Any corrective or preventative actions.

Reminders:

- Practice discretion: only share information from the report that must be disclosed to conduct the inquiry/investigation.
- Inform all individuals interviewed that the inquiry/investigation is confidential.
- Take proactive action to prevent adverse action against the reporter and inquiry/investigation participants.
- If required reporting is warranted by the report, or information revealed during inquiry/investigation, such as reporting to the Office of Institutional Equity, the Threat Assessment and Management Team etc., complete reporting and document the action.
- Units with existing internal assessment and investigative procedures should follow their own procedures. If those procedures conflict with this guidance, please consult with University Compliance.

Sample Report Response Template

Background Information:

In this section, provide information about the Ethics and Compliance report, when it was received, the names/titles/units of the individual(s) involved and any other relevant background information.

Scope:

Example: The scope of this inquiry/investigation is to determine whether there is sufficient evidence that Sally Smith violated the University's Misuse of Assets Policy.

Information Received:

In this section, summarize information received from interviews or other sources.

Documents Reviewed (optional):

Determinations/Findings:

State clear determinations or findings of facts.

For example: Sally Smith took four computers owned by the University without the authorization to do so.

Analysis:

In this section, provide the relevant policy or standard, state the standard of review (e.g., preponderance of the evidence, or more likely than not if relevant), and analyze whether there is sufficient evidence of a violation.

For example: Sally Smith violated the University's Misuse of Assets Policy.

Recommendations including Corrective and/or Preventive Actions (if appropriate):