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About EthicsPoint

What is the Dartmouth Compliance and Ethics Hotline?

The Dartmouth Compliance and Ethics Hotline is a telephone and web-based confidential reporting tool to assist members of the Dartmouth community and those who may come in contact with it. It addresses, among other things, abuse, fraud, and other misconduct or noncompliance. This reporting tool is consistent with Dartmouth's goal of cultivating a safe, equitable, and ethical environment.

What are the benefits of a confidential reporting system like the Dartmouth Compliance and Ethics Hotline?

Dartmouth is committed to exercising appropriate due diligence regarding all forms of misconduct and noncompliance. In fact, Dartmouth is required to ensure compliance with laws that relate to abuse, fraud, and other misconduct.

The Dartmouth Compliance and Ethics Hotline will help Dartmouth meet its commitment to promote a safe, equitable, and ethical work and learning environment. We understand that some individuals--either members of the Dartmouth community or those who come in contact with it--may feel uncomfortable expressing concerns directly to the individual suspected of misconduct or the appropriate Dartmouth leader or office. The Hotline allows individuals to communicate concerns about misconduct to Dartmouth while preserving anonymity.

To facilitate individuals reporting concerns confidentially, Dartmouth has partnered with a third-party vendor called EthicsPoint to receive the concerns either through a toll-free number [888-497-0516] or through a website: www.dartmouth.ethicspoint.com.

Each is owned and hosted by EthicsPoint, not Dartmouth. EthicsPoint reports the substance of the report to Dartmouth so the reported concern can be investigated and addressed. Your report can be made anonymously, but does not need to be. In either event, please provide as much information as possible so that Dartmouth can investigate fully the reported concern.

Reporting – General

What should I do if I think in good faith that someone has acted inappropriately?

Any member of the Dartmouth community who knows of inappropriate behavior, such as a violation of Dartmouth policies or procedures, or federal, state, or local laws, policies, or procedures, is encouraged to report such conduct. It is important to note that you may report your good faith observation to any manager, department leader (e.g., Dean, Vice President),



Human Resources, Institutional Diversity and Equity, Safety and Security, Risk Management, the General Counsel, or any other internal resource. Dartmouth understands, however, that making a report to any of these individuals and offices may not be appropriate or comfortable for any number of reasons. It is for that reason that Dartmouth has instituted this confidential reporting tool.

What types of situations can be reported through the Dartmouth Compliance and Ethics Hotline?

Members of the Dartmouth community and others can report any concern involving Dartmouth. Dartmouth, however, has developed a number of categories, which are listed below, to assist the reporter in framing his or her concern and to allow Dartmouth to refer the concern to the appropriate part of the organization so that the concern can be investigated. The Dartmouth Compliance and Ethics Hotline options include the following specific categories as well as a miscellaneous category for any area of complaint that is not otherwise listed. They include:

1. Academic and research misconduct
2. Child abuse
3. Discrimination or harassment
4. Employee misconduct
5. Financial misconduct
6. Hazing
7. Health, safety and environmental concerns
8. Privacy or confidentiality concerns
9. Sexual assault, abuse or harassment
10. Substance abuse
11. Violation of Information Technology policies
12. All other

How will I find out what action will be taken by Dartmouth if I report a concern through the Dartmouth Compliance and Ethics Hotline?

If you report a concern through the Dartmouth Compliance and Ethics Hotline and identify yourself (rather than submitting your complaint anonymously) you will be contacted by someone from Dartmouth's Office of Risk and Internal Controls Services (RICS) (or the Office of General Counsel if RICS is the subject of concern), who will let you know that the issue has been communicated to Dartmouth by EthicsPoint and is being reviewed by the appropriate department. If it is appropriate, the Office of Risk and Internal Controls Services or the actual investigating department will provide additional information about the outcome of the investigation. It is important to note, however, that certain information cannot be shared with you. For example, if the investigation were to lead to corrective action for an employee, this fact and the nature of the corrective action would not be shared with you because an



employee's employment record is private and generally cannot be shared with another person without consent.

Security and Confidentiality

I have a concern that I would like to report but I am worried that my colleagues or manager may learn that I raised this concern. What should I do?

Dartmouth understands that there may be times when you want to make a report but do not want to be identified by your manager or colleagues as having raised a concern. It is for this reason that Dartmouth created the Dartmouth Compliance and Ethics Hotline. You are free to make a complaint anonymously; you may also include your name if you wish. If, however, you are making an anonymous complaint, you must be sure to provide enough information for Dartmouth to understand your concern and conduct a thorough review and take action if appropriate. It is also important to note that Dartmouth prohibits retaliation against any person who has raised a concern in good faith about a violation of a law or policy. Good faith means that your concern is supported by a sincere belief based on the facts known to you at the time.

How can I be sure that my report using the Dartmouth Compliance and Ethics Hotline is not traced to my computer or phone?

Dartmouth uses a third party to manage the Dartmouth Compliance and Ethics Hotline. Dartmouth's vendor, EthicsPoint, is committed contractually not to pursue a reporter's identity. As a result, EthicsPoint does not record IP addresses and does not have access to or store any information related to source of incoming telephone calls; therefore, EthicsPoint cannot trace a report back to your computer or phone. If you remain concerned about your anonymity, consider making a report from a public phone or a private phone which is unlisted or where you block your caller ID, or reporting the complaint via computer from a non-Dartmouth location.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

Dartmouth will not learn your identity from EthicsPoint if you file an anonymous report. In some circumstances, however, your identity may nevertheless become apparent. For example, this may occur where the particular facts of a report suggest that it must have come from one person, or the reporter's identity becomes clear during the course of investigating the report. You will want to take care in how you report concerns. You may inadvertently provide background information that provides clues to your identity by using phrases in your report such as "From my cubicle next to Jan Smith..." or "In my 33 years..."

In all cases, Dartmouth forbids retaliation based upon making a good faith report and provides resources to assist reporters concerned about retaliation.

Will anyone outside the College see my report?

Reports may be made available to other persons, agencies or organizations that have a statutory or other legal authority to gain access, for example, to comply with a court order or subpoena or where investigation of the concern requires law enforcement assistance.



Where do these reports go?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available to specific individuals within Dartmouth's Office of Risk and Internal Controls Services (RICS) (or the Office of General Counsel if RICS is the subject of concern) who are charged with referring the matter to the appropriate College official based on the type of concern. If you have provided your identity you may be contacted to clarify the concern or to provide additional information.

What should I do if I believe I have been retaliated against as a result of reporting a concern through the Hotline?

You should contact the Chief Human Resources Officer, the Director of Employee & Labor Relations, or your Human Resources Consultant to discuss your concern about retaliation. Dartmouth prohibits retaliation against any person who has raised a concern in good faith, and will investigate any complaint appropriately and will ensure that the appropriate action is taken.

Tips and Best Practices

Why should I report concerns?

Dartmouth promotes ethical behavior. All unethical conduct, at any level, ultimately hurts Dartmouth's employees, students, and visitors, as well as its reputation. Institutional and individual misconduct threatens Dartmouth's integrity and environment. Reporting concerns helps to minimize the potential negative impact of inappropriate behavior on the community.

What should I do if I am not sure that the concern I have is really an instance of noncompliance with Dartmouth policy or applicable laws?

You may still report good faith concerns through the Dartmouth Compliance and Ethics Hotline. You will receive a response addressing your concern even if the response indicates that the issue is not a violation of law or policy. The goal is to ensure that your concern is addressed, whether or not additional action is required. It is better to report a situation that turns out to be harmless than to let possible unethical or illegal behavior go unchecked.

Do I need to have irrefutable evidence of noncompliant or unethical behavior before I raise a concern?

No. You only need a good faith basis for your concern. A good faith concern does not require complete information. Dartmouth will review the facts and review the matter in detail based on the information that you provide.

If I am a manager and an employee comes to me with a concern, what should I do?

If possible, you should investigate the matter. If you are unsure how to investigate the matter, contact the Office of Human Resources for assistance. If you determine that the matter can be addressed internally be sure to document the action taken and discuss the results with the employee, if appropriate, so that he or she understands how the matter has been addressed. If the concern involves your own conduct and cannot be resolved through discussion with the employee, you should contact the Office of Human Resources. You also have the option of submitting the matter to EthicsPoint.



Should I contact the police or other authorities outside of Dartmouth if I have a concern about conduct that may be illegal?

You have the right to contact the police or other external authorities. Some situations can often be resolved by Dartmouth internally. In other instances (including certain crimes), Dartmouth is required by law to report to police or other government authorities. If you are unsure about whether Dartmouth is required to report a situation, you may contact the Dartmouth Compliance and Ethics Hotline, Risk and Internal Controls Services, the Office of Human Resources, Safety and Security, or the General Counsel for advice. If you do contact the police or other external authorities, Dartmouth asks that you inform one of the offices listed above. You may also report notification of authorities through the Dartmouth Compliance and Ethics Hotline.

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

When you file a report through the Dartmouth Compliance and Ethics Hotline, you receive a unique user name and are asked to choose a password. You can return to the Hotline or website and access the original report to add more detail or answer questions and add further information that will help resolve open issues.