

**Appendix A to VSC Policy 211: *Whistleblower Policy for Reporting Fraudulent, Illegal or Improper Activities***

**QUESTIONS AND ANSWERS ON ETHICSPPOINT**

**1. What is EthicsPoint?**

EthicsPoint is a comprehensive and confidential reporting tool that allows people to report suspected illegal and unethical conduct anonymously. It is used by thousands of organizations, including hundreds of educational institutions. The EthicsPoint hotline is available 24 hours per day, 365 days per year, and is staffed by specially trained EthicsPoint personnel.

**2. What type of situations should be reported?**

EthicsPoint may be used to report any suspected activities described in Policy 211. Users may choose one of the following types of reports:

- Accounting and auditing matters
- Conflicts of interest
- Discrimination or harassment
- Embezzlement
- Falsification of contracts, reports or records
- Misconduct or inappropriate behavior
- Sabotage or vandalism
- Securities violations
- Substance abuse
- Theft
- Unsafe working conditions
- Violation of policy
- Violence or threat
- Other (to be used if the event, action or situation does not fall into one of the above categories).

**3. How are reports submitted to EthicsPoint?**

Users can file reports via either the telephone or the Internet:

- Through the VSC's website at <http://www.vsc.edu/faculty-and-staff/Pages/Employee-Benefits.aspx> or the websites of the member institutions (search for the term "whistleblower");

- Through the VSC/EthicsPoint web page hosted on an EthicsPoint secure server at <https://secure.ethicspoint.com/domain/media/en/gui/25224/index.html>;
- By dialing the toll-free EthicsPoint phone number: 1-866-215-4016. Phone lines are open 24/7 and multilingual operators are available.

#### **4. Where do the reports go? Who is notified about reports?**

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint will notify the Chair of the Audit Committee of the Board of Trustees, the Chancellor, General Counsel, and Associate General Counsel of all reports filed with EthicsPoint. In addition, EthicsPoint will notify the VSC Chief Financial Officer of any reports involving alleged financial irregularities and the VSC Director of Human Resources of any reports alleging employment-related issues. If any of these individuals are implicated in a report, the EthicsPoint system and report distribution are designed so that such individuals are not notified and do not have access to reports in which they have been named. Unless the President is implicated in an EthicsPoint report or there is a reasonable justification for not notifying the President, Presidents are notified by the Office of the Chancellor about reports relating to their institution.

#### **5. Can the VSC identify the reporter?**

No. EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking a reporter's computer to EthicsPoint is available. EthicsPoint is contractually committed not to pursue a reporter's identity. If a reporter feels uncomfortable making a report on a VSC computer, the reporter can use a non-VSC computer (such as one located at home, an Internet café, at a friend's house, etc.) to access the EthicsPoint secure website. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is maintained.

**Note:** The EthicsPoint system is designed to protect a reporter's anonymity but reporters should review the body of their report to make sure that they have not revealed their identity unintentionally. For example, "From my office next to Jan Smith..." or "In my 33 years..."

#### **6. Is the telephone toll-free hotline confidential and anonymous too?**

Yes. Reporters will be asked to provide the same information that they would provide in an Internet-based report and an EthicsPoint interviewer will type the responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

**7. What if a reporter does not want to be anonymous?**

There is a section in the report allowing reporters to identify themselves if they wish.

**8. What if a reporter is not sure whether something he or she has seen or heard is a violation of VSC policy or involves unethical conduct?**

If in doubt, file a report. EthicsPoint can help a reporter to prepare and file a report so it can be properly understood. The VSC would prefer that a situation that turns out to be harmless be reported rather than let possible unethical behavior go unchecked. Reporters may have useful knowledge of an activity that could be a cause for concern. Early reporting may minimize the potential negative impact of the suspected activity on the VSC, its students, and employees.

**9. What happens after a report has been filed with the EthicsPoint hotline?**

Typically, a reporter will receive confirmation within 2-3 business days that the Office of the Chancellor has received the report and that it will be reviewed. Then the Office of the Chancellor will make a preliminary evaluation of the report. If further investigation is merited, the Office of the Chancellor will appoint an investigator or, if appropriate, refer the report to a member institution for further handling. As circumstances warrant and as the law permits, the reporter may be informed whether an investigation is being undertaken and may be informed as to the final outcome.

**10. What if a reporter remembers something important after the report has been filed?  
What if the VSC has questions for the reporter?**

When a report is filed at the EthicsPoint Web site or through the EthicsPoint Call Center, the reporter receives a unique user name and is asked to choose a password. The reporter can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by the VSC or an investigator and add further information that will help resolve open issues. The EthicsPoint website supports the uploading of documents and photographs in support of a reporter's allegations. Reporters are encouraged to return to the site frequently to check for any updates and to answer follow-up questions. The reporter and the VSC will be part of an "anonymous dialogue." All follow-ups are held in the same confidence as the initial report.