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#### Frequently Asked Questions (FAQs) about Carolina Ethics Line

#### I. About Carolina Ethics Line

#### 1. What is Carolina Ethics Line?

Carolina Ethics Line is the anonymous reporting and inquiry service of the University of North Carolina at Chapel Hill. It provides a simple, anonymous way for concerned persons to report questions of unethical and improper conduct and/or violations of University policies and procedures, regulations, or state and federal laws. NAVEX Global's EthicsPoint is the third-party provider for the Carolina Ethics Line reporting tool.

Carolina Ethics Line offers both telephone and web-based reporting options. Neither service is maintained on the University's systems or by University employees. Reports can be filed anonymously and the reports are held securely on EthicsPoint's external systems.

- Carolina Ethics Line webpage: <u>unc.ethicspoint.com</u>
- Carolina Ethics Line toll-free telephone number: 1-866-294-8688.

#### 2. Why do we need a tool like Carolina Ethics Line?

All members of the campus community are obligated to maintain integrity and ethical behavior in the University's work. Although direct discussion with one's supervisor and other existing channels of communication are preferred methods for raising concerns, in some circumstances individuals prefer to remain anonymous while expressing concerns about potential noncompliance.

## 3. Don't we have other channels of communication about these compliance concerns?

There are a variety of campus channels of communication for expressing concerns and resolving them. Links to these resources are available through <a href="ethicsandintegrity.unc.edu">ethicsandintegrity.unc.edu</a>. While direct communication among the involved persons is generally preferred, when individuals feel that direct conversation is not a constructive option, Carolina Ethics Line is an additional method of reporting "good faith" compliance concerns.

# 4. What is the difference between Carolina Ethics Line and other "hotlines" like the State Auditor's hotline?

Unlike other hotlines, Carolina Ethics Line provides a way to report concerns anonymously through an independent party and it allows the University to send follow-up questions about a report or inquiry through the same anonymous service.

#### II. Reporting – General (How does it work?)

#### 5. Who can file a report?

Any individual with a question and possibly knowledge of an unethical action or possible violation of University policies and procedures, regulations, or state and federal laws.

#### 6. What types of situations should I report?

You should file reports or inquiries about possible ethical and/or policy violations. Carolina Ethics Line offers nine reporting categories, as well as a number of associated subcategories associated with each.

- Academic Matters
- Accounting and Financial Matters
- Athletics
- Faculty and Staff Matters
- Health Care
- Information Technology
- Research
- Risk and Safety
- Student Matters
- Other

# 7. May reports be filed through Carolina Ethics Line using either the internet or the telephone?

Yes. By giving both choices, Carolina Ethics Line helps ensure that members of the campus community can file a report anonymously and in the manner most comfortable or convenient to them.

#### 8. Where do these reports go? Who can access them?

Reports through Carolina Ethics Line are entered directly on the EthicsPoint secure server to prevent any possible breach in security. Again, you can submit a report through the secure webpage or phone line. If you choose to file a report using the toll-free phone number, a third party (NAVEX) intake specialist will enter the report information into the EthicsPoint system on your behalf.

NAVEX makes these reports available on the EthicsPoint system only to specific individuals at the University who are charged with evaluating the type of issue indicated in the report, and who understand the importance of maintaining confidentiality. Each of these Incident Managers has had training in keeping these anonymous reports in the utmost confidence.

#### 9. How long will it take for me to file a complaint?

Generally, it should take less than 15 minutes to file a report using Carolina Ethics Line. This is true for reports filed using the toll-free telephone number or the secure web address. We do not expect any report filing to take longer than 30 minutes.

10. I am not sure if what I have observed or heard is a violation of University policy, or involves unethical behavior, but it just does not look right to me. What should I do?

You should file a report. Carolina Ethics Line can help you prepare and file your report so it can be properly understood. We would rather be alerted to a situation that turned out to be harmless than let possible violations go unchecked because you weren't sure.

#### 11. Can a person file a report without access to the internet?

If a person does not have access to the internet or prefers to use a telephone, the individual can call the Carolina Ethics Line toll-free (866-294-8688) 24 hours a day, 365 days a year.

#### 12. What happens after a report is filed?

When completing a report through the Carolina Ethics Line website or phone number, you receive a unique username ("report key") and choose a password. The report key and password allow you to return to Carolina Ethics Line to check your report for comments or follow-up questions. Meanwhile, EthicsPoint notifies the appropriate designated University administrator that there is a report posted to a secure access site on the EthicsPoint system.

Within 3 business days, the University administrator will review the allegations in the report and acknowledge receipt of the report. Based on the nature of the allegations, the administrator uses Carolina Ethics Line internal features to assign the report to a Primary and/or Secondary Incident Manager for review and resolution.

Reporters should return to Carolina Ethics Line and click "Track a Report" after 10 business days to check for a University response.

13. What if my boss or other managers are involved in a problem? Won't they get the report and start a cover-up?

The Carolina Ethics Line report distribution process is designed so that a report is not shared with implicated parties or their subordinates. If a University administrator is implicated, the report is available only to certain other University administrators.

14. What if I remember something important about the incident after filing the report? Or what if the University has further questions concerning the report?

When you file a report on the Carolina Ethics Line website or via the Carolina Ethics Line toll-free number, you receive a unique username ("report key") and are asked to choose a password.

You can return to Carolina Ethics Line again either by internet or telephone and use your *report key* and *password* to access the original report, answer any questions posed by an Incident Manager, and add further information that will help resolve open issues. We strongly suggest that you return to the site within 10 business days of filing your report to answer any follow-up questions. Through the Carolina Ethics Line secure platform, you and the University can enter into an "anonymous dialogue" called *EthicsChat* where you can clarify what you observed. In an *EthicsChat* session, you will only be identified as "reporter" to the University Incident Manager.

## 15. Won't this tool just encourage individuals to gripe or to make wild charges about others?

Carolina Ethics Line provides a clear channel of communication for good faith concerns, and it is also structured to focus the report on specific, defined University compliance problems or issues. Reports or inquiries posted to Carolina Ethics Line help us assure that Carolina is a safe, secure, and ethical place to work and study. Although this system and others can be misused, we rely on integrity and good intentions of reporters to avoid frivolous or erroneous reports.

#### 16. Is there any monetary reward for these reports?

No. The reason for making a report is a genuine concern for the integrity of the University's work. Although there have been various newspaper accounts of large monetary payments to whistleblowers ("Qui Tam relators") who have reported violations of the federal False Claims Act, individuals do not receive money for relating federal False Claims Act violations by state agencies.

#### 17. How will I know if the University took my report seriously?

Good faith inquiries or reports are essential for the effective functioning of the University, and thus the administrators and incident managers affiliated with Carolina Ethics Line take reports seriously. However, depending on the nature of the complaint, investigation, and resolution, the University may not be at liberty to reveal the results to the reporter or to others who have participated in the investigation.

#### III. Security & Confidentiality in Reporting

#### 18. Are anonymity and confidentiality guaranteed?

The University cannot guarantee either anonymity or confidentiality but we have established Carolina Ethics Line to provide maximum potential for both. In some

situations, the University cannot by policy take action on a complaint unless complainants are willing to identify themselves. An example is a charge of scientific misconduct (see the University's Research Misconduct Policy).

Unless you identify yourself, your identity cannot be disclosed to the University. Should you choose to identify yourself, the University will keep your identity confidential, unless disclosure is required by law.

19. It is my understanding that any report sent from a University computer generates a server log that shows every website that my PC connects with, and won't this log identify the Carolina Ethics Line report originator?

EthicsPoint itself does not generate or maintain any internal connection logs with IP addresses, so no information linking a PC to Carolina Ethics Line is available through EthicsPoint. However, information about your web access to EthicsPoint can typically also be found both on the computer you use to contact EthicsPoint and also in various network logs used for network performance. If you want to make certain that no University systems include a record of the computer connection to the Carolina Ethics Line (EthicsPoint) website, you may want to file a web-based report through a computer that is not on the University network, such as a computer at a public library.

20. Can a report be filed from home and still remain anonymous?

You can file a Carolina Ethics Line report from any computer that can access the internet. This includes home computers. An internet portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses so that anonymity is maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

21. Is the toll-free telephone line confidential and anonymous too? It is my understanding that University telephone logs show the phone numbers accessed through University telephones.

The toll-free Carolina Ethics Line telephone reporting service is also operated by EthicsPoint and is available toll-free at 866-294-8688, 24 hours a day, 365 days a year. Callers 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 Carolina Ethics Line web-based report form. EthicsPoint safeguards reports received through the telephone just as it does those received through the internet.

University telephone system logs do show telephone numbers accessed through University telephones. If you wish to maintain maximum anonymity in using the telephone Carolina Ethics Line service, we recommend making the toll-free call using a non-University telephone.

22. Are follow-up reports as secure as the first one?

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All Carolina Ethics Line correspondences are held in the same strict confidence as the initial report.

# 23. I am concerned that the information I provide Carolina Ethics Line will ultimately reveal my identity. How can you assure me that will not happen?

Carolina Ethics Line is designed to protect your anonymity. However, if you wish to remain anonymous, you need to be sure that the information you provide does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

If you are the only individual who could possibly know the reported facts, there may be an unintended deductive disclosure of your identity. The University will honor and protect your request for confidentiality to the extent possible as it fulfills its obligations in responding to the report.

#### 24. What if I want to be identified in the report?

There is a section in the report for you to identify yourself if you wish to do so.

#### 25. Why would I want to disclose my name?

Investigations are sometimes more effective if the investigator knows who the reporter is and is able to converse directly with the reporter to obtain information and clarification throughout the course of the investigation. The anonymous reporting line provides a mechanism that enables investigators to post questions or comments to the reporter, but this approach is not as effective as a live conversation.

#### 26. What about reprisal or retaliation for making a report?

University policy and state law prohibit retaliation or reprisal against an individual for reporting in good faith a possible violation of state or federal law, rule or regulation. The University is committed to preventing retaliation against you after you make a "good faith" disclosure or for having reported wrongful conduct. If you feel you are experiencing retaliation, we encourage you to reach out to your department's HR personnel. The UNC Office of Ethics Education and Policy Management can provide assistance in connecting to appropriate University officials for questions regarding specific areas of wrongful conduct as well as retaliation protections.

#### IV. Miscellaneous

#### 27. What if I have other questions about this Carolina Ethics Line?

You may call the Office of Ethics Education and Policy Management with any questions about Carolina Ethics Line:

• Phone: 919-445-8362

Email: ethicsandintegrity@unc.eduWeb: ethicsandintegrity.unc.edu