

EthicsPoint, Concern Reporting, and Handling Issues

December 3, 2019

Northwestern

About the Office

- Centralized risk governance operations inform Northwestern's enterprise risk management program
- Risk Management
- Safety
- Internal Audit
- Compliance
- Conflict of Interest
- <https://www.northwestern.edu/risk/>

Compliance Environment at Northwestern

- Northwestern operates in a federated, decentralized compliance environment
- Schools and units are responsible for being aware of, and complying with, University policies
- Key units exist to foster compliance and assist with complicated, specialized issues
- The central compliance function exists to triage issues, coordinate across compliance functions, and address compliance/ethics issues not owned elsewhere

Reporting Concerns

- For emergencies, or situations that threaten immediate safety, it is essential to report to the appropriate authorities
- In Evanston/Chicago, that means calling 9-1-1 or contacting NUPD
- At NU-Q, follow the HSSE Safety and Security guidance at: <https://my.qatar.northwestern.edu/campus/safety/index.html>

EMERGENCIES

Call **4454 0999** for any situation that requires any immediate police, fire, or medical response inside Education City.

Learn what to do in an emergency:

- Keep updated on any ongoing emergencies
- Emergency preparation and response
- Procedures for various situations
- Emergency kits

[VIEW EMERGENCY INFORMATION](#)

REPORT AN ACCIDENT OR CONCERN

Members of our community are encouraged to report all accidents and also identify and report threatening or concerning behavior within our campus.

All concerns requiring **immediate** attention (criminal, violent, threatening, or imminent suicidal behavior) should be directed to Qatar Foundation Security by calling **4454 0999**.

Security concerns should be reported to NU-Q security guards or, if you prefer, the nearest Campus Security Authority (CSA).

- Report an Accident
- Report a Person of Concern

[REPORT AN ACCIDENT OR CONCERN](#)

Compliance, Personnel, or Other Concerns

- For the majority of matters, the expectation is that you raise concerns initially to your direct supervisor or manager
- Why?
 - It's important that supervisors know what is happening in their units and impacting their staff
 - They should be aware of how to handle the majority of situations
 - They will ensure coordination as appropriate
 - It will remove the need for you to manage the situation alone
- There may be situations where this is not the right solution:
 - The concern is about your supervisor
 - You reported it but nothing was done
 - You are not comfortable talking to your supervisor about the issue

Option One

- Report the issue to direct manager of your supervisor
- If that individual is conflicted or involved, consider someone else higher in the reporting line
- *Note:*
 - *It's appropriate for schools or units to define their own chain of command for certain issues*
 - *Typically, the Dean or VP does not expect to be involved in every situation, but will rely on the leadership team to keep informed as appropriate*

Option Two

- Report the issue to the office or unit intended to handle such issues
- These units can vast experience and have likely dealt with concerns similar to yours
- Some key offices you should be aware of:
 - Office of Equity
 - Human Resources
 - Conflict of Interest
 - Dean of Students / Student Affairs
 - General Counsel
 - Research

Specialized Reporting

Specialized Reporting

Specific concerns can be addressed by contacting the following subject matter resources.

- > [Academic Integrity](#)
- > [Accessibility](#)
- > [Animal Research](#)
- > [Athletics](#)
- > [Campus Crime Reporting \(Clery Act\)](#)
- > [Discrimination or Harassment](#)
- > [Hate or Bias Incidents](#)
- > [Hazing](#)
- > [Human Participant Research](#)
- > [Information Technology](#)
- > [Missing Student](#)
- > [Property damage, accidents, and workplace injuries](#)
- > [Research Lab Safety](#)
- > [Research Misconduct](#)
- > [Sexual Misconduct](#)
- > [Student Behavior](#)
- > [Threatening Behavior \(Wildcats Aware\)](#)

Specialized Reporting

> Campus Crime Reporting (Clery Act)

▼ Discrimination or Harassment

Report violations of Northwestern's [Policy on Discrimination and Harassment](#).

[Office of Equity](#)

(847) 491-6697

equity@northwestern.edu

SUBMIT A DISCRIMINATION OR HARASSMENT REPORT

▼ Hate or Bias Incidents

Report hate or bias related incidents to the Bias Incident Response Team (BIRT) at [Respect NU](#).

SUBMIT A HATE OR BIAS INCIDENT REPORT

▼ Hazing

Report violations of [Northwestern's Policy on Hazing](#).

SUBMIT A HAZING INCIDENT REPORT

> Human Participant Research

These links take you directly to the reporting mechanism developed by the unit

Option Three

- Call or email the University's Compliance Office

Luke Figora

Senior Associate Vice President
Chief Risk and Compliance Officer

[Northwestern University](#)

2020 Ridge, Suite 240

Evanston, IL 60208

luke.figora@northwestern.edu

O: 847.491.7696

C: 773.294.3386

Aaron Hosmon

SESP '03, MS '07

Director of Compliance & Ethics

Northwestern University

1603 Orrington Ave, Suite 1250

Evanston, IL 60201

hosmon@northwestern.edu

Office: 847-467-6171

Option Four

- Submit a report via EthicsPoint
- What is EthicsPoint?
 - A mechanism for the community (faculty, staff, students, alumni, visitors, etc.) to report issues
- EthicsPoint is not intended to undermine or duplicate the work being done by other units
- EthicsPoint can be used to report anything, but shouldn't be used to report everything

How to Use EthicsPoint

- Call the EP hotline (US toll free) – 1-866-294-3545
- Submit a report via the web

EthicsPoint

EthicsPoint is a simple online system for reporting activities that may involve misconduct or violations of University Policy.

This is an additional method of reporting suspected problems and complaints. EthicsPoint is not a substitute for, nor does it supersede, any existing reporting methods or protocols already in place at Northwestern.

Any suspected problems or complaints reported via EthicsPoint will be reviewed in accordance with current University procedures, including those described in the Faculty, Staff, or Student Handbooks.

File a Report

- [Submit an online report](#), or
- Call the hotline: 866-294-3545

How to Use EthicsPoint

Our Commitment

Northwestern's commitment to innovation, excellence, and collaboration extends to all aspects of our mission as an educational and research institution. Our Standards for Business Conduct provide a framework of principles and policies to guide you in upholding the highest standards of ethical and professional behavior.

Speak Up

We encourage you to speak up. If you have reason to believe wrongful or unlawful activity has occurred, we ask you to report all relevant information to an individual or office who can investigate the matter. This could be your supervisor, department chair, dean, or administrative lead; or a person or office charged with investigating specific types of misconduct.

In situations where you prefer to report anonymously, we encourage you to use this hotline, hosted by EthicsPoint, a third-party provider. Information you report through EthicsPoint is sent to Northwestern confidentially and anonymously. Please see the EthicsPoint FAQ's for more information.

Non-Retaliation

Northwestern's Policy on Non-Retaliation strictly prohibits retaliation against any member of its community for reporting or inquiring in good faith about suspected wrongful or unlawful activity, or participating in an investigation or proceeding related to such activity. The University considers such actions to be protected activities in which all members of its community may freely engage without worry of negative consequences.

Report a Concern

Select the location where the incident took place

OR

To make a report via phone, dial **866-294-3545**

After you complete your report, you will receive a unique report key and be prompted to create your own password. Write down your report key and password, and keep them in a safe place. You will use them to access the EthicsPoint system to view your report, answer any questions, provide additional information, or check the progress of the report investigation.

Follow-Up on a Report

Report Key:

Password:

Submit

If you do not have an EthicsPoint report key and password, please [click here](#) to follow up.

For new issues

To follow-up on a report

Demo

• **When Should I Use EthicsPoint?**

- You have reported the issue to your manager or another office, and nothing has been done
 - *Note: issues impact people in different ways. Sometimes, you may not be satisfied with the outcome of a report, but all the correct policies and procedures were followed and the issue was adequately reviewed and investigated.*
- You are not sure where to report the issue or the issue is unique and does not clearly fall to another unit
- You are concerned about reporting and desire to initially report anonymously

Anonymity

- EthicsPoint and Northwestern fully support anonymous reporting
- However, it is important to know that anonymous reports may limit our ability to completely investigate the matter
- Factors which might impact an investigation of an anonymous report:
 - The specificity of information provided
 - Whether there are other individuals willing to participate in an investigation
 - The severity of the complaint
 - Other sources of information related to the issue at hand

What to Expect When Filing a Report

- You will receive an initial response thanking you for the report
- If additional information is needed, you will be asked:
 - Whether you would be willing to have a confidential conversation
 - Whether you have any additional information to provide
- If the report falls within the purview of another office, the matter will be referred
 - *Note: a key principle is that we must follow our protocols/processes consistently. For example, if you are filing a sexual misconduct complaint, it will be referred to the Office of Equity and the Sexual Misconduct Complaint Resolution Process will be followed.*
- Unless you continue to be involved in the matter, you likely will not hear more while the issue is being investigated
- You will be notified when the matter is closed, but that does not mean you will necessarily be privy to all the details of the investigation or the outcome
- You can use the follow-up tool to check on the status or post additional information

Confidentiality

- EthicsPoint reports are shared on a very limited basis – generally only with those who need to know in order to complete an investigation and those directly impacted
- Aggregate information shared with senior leadership and the Board of Trustees
- Whether your name can be confidential may depend on the nature of the issue and what outcome you expect
- The expectation is generally that you are also treating the issue in a confidential manner
 - Sharing information widely could impact the ability to complete an unbiased investigation
 - If the report is about an individual, that person needs to be treated fairly

Non-Retaliation

- The University's Policy on Non-Retaliation applies to those utilizing EthicsPoint or otherwise reporting concerns in good faith
- <https://policies.northwestern.edu/docs/non-retaliation-policy-FINAL.pdf>
- If you feel you are being retaliated against due to reporting an issue, please contact Human Resources or Compliance

Resources

- Policies
 - <https://policies.northwestern.edu/>
- EthicsPoint
 - <https://secure.ethicspoint.com/domain/media/en/gui/7325/index.html>
- Specialized Concern Reporting
 - <https://www.northwestern.edu/risk/compliance/report-a-concern/specialized-reporting.html>