



Policy Approval/Review Form

This form is used for the approval, amendment, removal or review of a Gordon State College policy. Once authorized with the President's Signature, the policy will be posted to the Gordon State Website. This approval form will be filed in the Office of the President with Cabinet minutes noting approval.

Policy Title *	Ethics Reporting Hotline
Department	Human Resources
Policy Editor	Madelyn Brown
Request Type	New ☐ Amended ☒ Removed ☐ Reviewed ☐

OBJECTIVE (Briefly state your purpose.)

This policy and procedure supports the efforts by Gordon State College to promote the highest standards of ethical and professional conduct; ensure compliance with all applicable laws, regulations and policies and conduct compliance investigations and reviews are completed in a timely manner.

RESOURCES AND CONSULTATION (Briefly describe the resources (i.e. website, link) used in developing, amending, removing, or reviewing the policy. Include names of other individuals who assisted with this change.)

https://www.usg.edu/organizational_effectiveness/ethics_compliance#:~:text=ETHICS%20HOTLINE,%2D877%2D516%2D3466

COMMUNICATION PLAN (Identify how information about how the policy will be communicated to the college as well as training plans if applicable.)

Not necessary; no changes made to communicate

Authorizations

Dean or Supervisor Signature and Date: _____

Cabinet Sponsor (VP) Signature and Date: _____
Madelyn Brown Digitally signed by Madelyn Brown
Date: 2021.03.12 06:54:46 -05'00'

President Signature and Date: _____


***Policy Template must be submitted with this form.**



Policy Name:	Ethics Hotline Reporting				
Section #:		Section Title:			
Responsible Cabinet Member:	Director of Human Resources	Proposed:		Adopted:	
Responsible Office:	Human Resources	Reviewed:	3/1/21	Revised:	3/1/21
Contact:	Madelyn Brown	Approved:	3/10/21	Webpage:	

1. Policy Statement

This policy sets forth a reporting mechanism for Hotline complaints in compliance with University System of Georgia

2. Reason for Policy

The purpose of this policy is to provide a confidential reporting mechanism for Hotline complaints.

3. Who Should Read this Policy

All members of the Gordon State College community

4. Resources

[BOR Policy 8.2.18.1](#)
[USG Ethics and Compliance Program](#)

5. Definitions

6. The Policy (or “See Attached”)

Policy:

Gordon State College complies fully with the University System of Georgia (USG) policies on Reporting Wrongdoing and Ethics and Compliance Reporting Hotlines. GSC is committed to an ethical, efficient, and effective work environment to allow us to successfully accomplish our mission. As a result, we place a high priority on assuring that each member of our college community has the opportunity and means to convey any matter that could compromise that environment. Employees are encouraged to report such matters through his/her supervisory chain which frequently produces the most thorough and timely resolution of a matter. In keeping with our efforts to expand alternatives for reporting matters of significance, reporting through the Hotline service provided by NAVEX, an independent company, is available 24 hours a day, 7 days a week. The Hotline does not replace the existing reporting mechanisms, but serves as an additional reporting mechanism. The Hotline allows faculty, staff, students and visitors the option to confidentially report concerns and wrongdoing by telephone or on-line, and to remain anonymous if so desired. A link to the GSC Ethics and Compliance Hotline exists on the GSC landing page.

This policy sets forth a reporting mechanism for Hotline complaints; however, depending on the nature of the complaint, additional Gordon State College policies may detail the exact process to follow for investigation and resolution of a specific Hotline complaint. Hotline complaints alleging sexual harassment, academic misconduct, poor work performance and conflict with other employees will be investigated according to the applicable procedures set forth in the corresponding college policy.

I. Conduct to Report: Per USG policy, GSC employees have an affirmative responsibility to report wrongdoing in a timely manner. Wrongdoing is defined under this policy as violation of GSC policies, USG policies, state or federal law, violations of ethical and professional conduct and fraud, waste or abuse. Examples of wrongdoing include, but are not limited to: USG or GSC Code of Conduct violations, discrimination, harassment, research misconduct, academic misconduct and privacy violations. Fraud, waste and abuse as well as harassment of any kind are of special concern to GSC as these can impact our stewardship responsibilities and the well-being of individuals in the campus community.

II. Where to Report: Conduct which presents an immediate threat to life or property or that is an obvious criminal act should be reported to Public Safety and/or local law enforcement. Employees should report significant concerns or wrongdoing through the appropriate supervisory chain. However, other reporting avenues are available to include the GSC Internal Auditor, Public Safety, Human Resources, Business Affairs and Conflict Resolution. Wrongdoing and significant concerns can also be reported confidentially on the Ethics Hotline at: <https://gdn.alertline.com/gcs/welcome>.

- A. Confidentiality Statement:** All employees involved with a Hotline complaint are accountable and responsible for maintaining confidentiality. Due diligence and reasonable care must be exercised when handling confidential information. Employees involved in a Hotline complaint should not discuss the matter with anyone outside the necessary reporting chain. An attempt to influence another employee's responses during an investigation is prohibited. Employees should not report on or release any information about the incident to internal or external parties without approval.
- B. Protection against Retaliation:** GSC and its employees may not interfere with the right of an employee to report concerns or wrongdoing and may not retaliate or take

adverse employment action against an employee who, in good faith, has reported concerns or wrongdoing or has cooperated in an investigation. Retaliation violates federal and state laws, Board of Regents' policies, and GSC policies. Alleged violations of this provision should be reported to the Director of Human Resources. Violations of this provision may result in disciplinary action up to and including termination.

- C. **False Reports/ False Information:** This policy does not protect an employee who files a false report or who provides information without a reasonable belief in the truth or accuracy of the information. Any employee who knowingly files a false report or intentionally provides false information during an investigation may be subject to disciplinary action which may include termination of employment.

III. Complaint Management: The Director of Human Resources is responsible for managing the Hotline. Complaints that escalate to an emergency level are immediately transmitted by NAVEX operators to the Director of Public Safety. Non-emergency complaints are emailed by NAVEX operators to the GSC Hotline Coordinators. The GSC Hotline Coordinators are comprised of the Director of Human Resources and the President of the College. Complaints received through the Hotline are assigned for investigation in the same manner as face to face complaints according to college policy.

IV. Complaint Review and Assignment: Within 48 hours of receipt of a complaint from NAVEX, the Director of Human Resources will respond to the reporter acknowledging receipt of the complaint and notify the appropriate senior administrator to evaluate the complaint. The senior administrator will meet with the respective unit head to review the substance of the complaint and the parties involved, determine if a conflict of interest exists, determine if a full investigation is warranted, and to discuss follow up. Any party with a conflict of interest will be excluded from further access to the complaint and the complaint will be reassigned. When the complaint involves multiple areas, an investigative team consisting of senior administrators and unit heads may be formed to coordinate the investigation.

When a complaint is received for which an existing college policy and complaint mechanism exists, the complaint will be assigned, investigated and resolved pursuant to such policy. For example: student sexual misconduct complaints will be assigned to the Title IX Coordinator for investigation and resolution according to the college's Title IX policy.

Malfeasance complaints will be assigned to the Vice President of Financial Services. Complaints involving potential fraud, waste and abuse by an employee will also be reported to the USG Office of Internal Audit. Complaints of potential criminal malfeasance by an employee will be reported to the USG Chief Audit Officer. Complaints involving GSC Hotline Coordinators or executive management shall be referred to the USG Director of Ethics & Compliance and assigned accordingly.

V. Investigation Procedures: The respective senior administrator, also identified as the case manager, will be assigned the complaint. The case manager will notify the unit head of the existence of the complaint and the pending investigation. If doing so will not compromise the investigation, the case manager and/or the unit head will notify the individual named in the complaint that a complaint has been made through the Hotline about him or her and that such complaint is under investigation. The accused will be notified of

GSC's no retaliation policy and confidentiality policy. The scope of the investigation should include at a minimum, an interview with the individual reporter, if the reporter self-identified and the accused. Other individuals named in the complaint should be interviewed, only if a witness or if necessary, to substantiate or refute the allegations, with careful evaluation after each interview, using the procedures recommended by the USG Office of Internal Audit. All individuals interviewed will be reminded of the GSC's no retaliation policy and confidentiality policy. In addition, the case manager should review policy and procedures relevant to the complaint. The case manager will document all relevant information to the case file and prepare a report summarizing the investigation. The Director of Human Resources will monitor the investigation and provide reminders to the case manager, if needed, to ensure swift resolution. GSC's goal is to have all matters resolved in a timely manner, provide prompt and thorough communication to the reporter and the accused, and document the process in NAVEX.

VI. Investigation Outcomes and Actions: If an investigative report reveals that an employee has violated a policy or policies of the College or of the Board of Regents, that an employee or unit needs training on a particular topic, counseling, reprimand, suspension, termination, or any other corrective action is recommended, the matter will be referred to the employee's supervisor and the Director of Human Resources for resolution. In such instances, the employee and his or her supervisor will meet with Human Resources to review the matter and plan the corrective action(s) for the employee and/or unit. The Director of Human Resources will communicate the planned corrective action. The final investigative report will reflect the completion date of the corrective action. If the investigation reveals a policy or procedure is needed or existing policy or procedure needs revising, the matter will be referred to the appropriate area for follow up.

If an investigative report reveals that an employee violated city or county ordinance or state or federal law, the Director of Human Resources will report this to the GSC and USG Office of Internal Audit and to law enforcement. If an investigation reveals that a student has violated the Student Code of Conduct, the case manager's report will reflect this and the matter will be referred to the Vice President of Student Affairs.

The Director of Human Resources or a designated Hotline Coordinator will be responsible for closing the case after the investigation is complete, all corrective actions are completed and documented in the NAVEX system, and all parties are notified of the resolution.

VII. Tracking Complaints: Gordon State College will analyze all complaints to track and monitor trends or problem areas that may need focused management attention. GSC will provide additional controls, expanded policies or procedures or additional management review if needed. All GSC employees will be notified that retaliation by an employee that is subject of a complaint is strictly prohibited and may subject the employee to termination and possible legal action.

USG Compliance and Ethics Program staff will be consulted as needed, about appropriate responses to a Hotline complaint. Any complaint and investigation about a USG President, or Vice President will have oversight of the University System of Georgia Office of Internal Audit.