



Administrative Policies and Procedures

| Procedure Number | Subject | Effective Date | Revised Date |
|-------------------------|----------------|-----------------------|---------------------|
| HR-1.4.31 | Ethics Hotline | 07/01/2008 | |

1.0 Purpose and Policy

Bainbridge College is committed to the highest standards of ethics and integrity. The purpose of this policy is to communicate to all BC employees an expectation and requirement of ethical conduct and compliance with all applicable laws, policies, rules and regulations. Ethical conduct and compliance is a personal responsibility, and every employee will be held accountable for his/her conduct.

2.0 Scope

This policy applies to all full-time and part-time faculty and staff, all student employees, and all contracted employees of Bainbridge College. The scope of this policy may be expanded from time to time to include other employees when and if deemed necessary.

3.0 Procedures

A toll-free telephone number (the “Ethics Hotline”) has been established to facilitate the anonymous reporting of incidents of suspected wrongdoing. The Ethics Hotline is available 24 hours a day, seven days a week (877-516-3420). The College ensures no employee will suffer any retaliation in connection with the reporting of any suspected wrongdoing. The Ethics Hotline is designed to:

- Protect the caller’s identity if they choose to remain anonymous.
- Cause calls to be assigned a case number so the caller can follow up on the status of their call either via telephone or a secured website (<http://www.tnwinc.com/bnc/>).
- Cause all calls to be screened and the appropriate individual within the College will be notified for appropriate and expeditious investigation.
- Provide the Vice Chancellor for Internal Audit of the University System of Georgia to receive detailed status reports of all calls to the Ethics Hotline.

The Ethics Hotline number will be made readily available to all employees and students through posters displayed throughout the campus as well as posting the phone number on the College’s website. Human Resources provides new employees with information about the Ethics Hotline with their new hire paperwork at orientation.

4.0 General Instructions

1. Employees or students who feel the need to voice a concern and are not comfortable going through the available channels with the College may call



- the Ethics Hotline to register their concern through this confidential method.
2. If the caller chooses to remain anonymous, their identity will be protected. The Ethics Hotline is operated by The Network, which is a third-party provider of employee hotline services. The Hotline is staffed with skilled operators who will assist employees or students in registering their concern.
 3. Those employees or students who wish to remain anonymous will be issued a unique ID number to allow them to follow up on the status of their concern either through a follow up call or through a secure website. This also allows the College to ask follow up questions of the caller while preserving their privacy.
 4. No retaliation will be tolerated against employees who use the Ethics Hotline.
 5. Employees may register their concerns via the toll free number (877-516-3420) or through the secure website (<http://www.tnwinc.com/bnc/>).
 6. All calls will be evaluated and categorized by the operators and then the appropriate department within the College will be notified for follow up.
 7. In case of complaints related to any member of the College's senior management team, the Vice Chancellor of Internal Audit for the University System of Georgia will be notified directly.
 8. A periodic report of all calls, including the follow up actions and current status, will be sent to the Vice Chancellor of Internal Audit for the University System of Georgia.
 9. The College will take appropriate measures to ensure that all affected employees and students are made aware of the Ethics Hotline and understand that senior management encourages its use at the individual's discretion.

5.0 Dissemination of Information and Escalation Criteria

1. Reports received through the Ethics Hotline are disseminated to designated individuals on campus through the Ethics Officer, except in the case of complaints about the College's senior management, as mentioned in Section 4.0, item number 7.
2. If the complaint is not categorized in the immediate notification or escalation category, as listed below, action on the complaint will commence within 48 business hours.

Reports generally requiring immediate notification or escalation include:

- Threat of violence or physical harm to faculty, staff, and/or students
- Threat of business interruption
- Notice that a high-risk incident is expected to happen within the next 24 hours
- Fraud
- Falsification of College records
- Theft



3. An investigation team will be put together by the Ethics Officer from a pre-determined list of investigators in each department/office on campus. The members of the investigation team will depend on the type of complaint received through the hotline.

Sample report distribution structure is below:

| ISSUE | POTENTIAL RECIPIENTS |
|---------------------------|--|
| Employee Mistreatment | Human Resources, Ethics Officer |
| External Fraud | Internal Audit, Risk Management, Ethics Officer, Security |
| Accounting Irregularities | Internal Audit, External Auditors, Ethics Officer |
| Workplace Violence | Security, Human Resources |
| Employee Theft | Risk Management, Security, Human Resources |
| Academic Irregularities | Academic Affairs, Student Affairs, Risk Management, Internal Audit, Ethics Officer |
| Student Complaints | Academic Affairs, Student Affairs, Risk Management, Internal Audit, Ethics Officer |

4. Investigators will be given no more than 72 hours to complete their investigation. Exceptions will be granted on a case-by-case basis when necessary.
5. Investigators will reconvene at the end of the investigation timeframe to discuss the findings. If further investigation is deemed necessary, the caller will be notified of the investigations progress. Up to an additional 72 hours will be granted to the investigators.
6. At the end of the investigation, the investigating team will convene to compile a report, make recommendations for further action as needed, and sign off on the report. The College President and the Ethics Officer will receive a copy of the report for approval and further recommendations as necessary.
7. Once the President and the Ethics Officer approve the report, the investigating team will be notified of the approved action and will then notify the caller of the findings and action taken, and will close the case. It is the responsibility of the President and the Ethics Officer to carry out any action necessary as follow-up to the complaint and/or report.