



UWF INTEGRITY HELPLINE: STANDARD OPERATING PROCEDURES

*Developed by: Matt Packard, Chief Compliance Officer
Office of Compliance and Ethics
oce@uwf.edu | x6070*

1. **REASON/PURPOSE:** TO ESTABLISH A STANDARD SET OF PROTOCOLS THAT ASSURE CONSISTENCY, TRANSPARENCY, AND IMPARTIALITY IN THE MANAGEMENT OF UWF INTEGRITY HELPLINE CASES

1.1. The University of West Florida's ("UWF") Integrity Helpline is an anonymous reporting mechanism hosted by a third-party vendor, EthicsPoint¹. The EthicsPoint system is a means for employees to report any activities that violate UWF's values, code of conduct, policies and procedures, or any laws or regulations, whether local, state, or federal. The goal of the Helpline is to proactively detect and address misconduct and foster a culture of compliance and ethical conduct.

2. **STRUCTURE:** TO ESTABLISH THE ORGANIZATIONAL STRUCTURE, OVERSIGHT, AND ADMINISTRATION OF THE ETHICSPPOINT SYSTEM

2.1. The Office of Compliance and Ethics ("OCE") shall oversee EthicsPoint operations.

2.2. The University Chief Compliance Officer and Chief Audit Executive will serve as System Administrators, who are responsible for general maintenance and access to the EthicsPoint system.

2.2.1. System Administrator duties include password retrieval, adding/removing access, modifying default responses, and other administrative responsibilities.

2.3. A panel of four (4) University representatives will serve as the **Helpline Oversight Panel** and screen *all* incoming Helpline reports. The following section discusses the role of the Helpline Oversight Panel.

¹ For the purposes of this document the terms "Integrity Helpline," "Helpline" and "EthicsPoint" are interchangeable

3. **REPORT INTAKE:** WHAT TO DO ONCE A REPORT IS *RECEIVED*

3.1. When a report² is received, each of the four administrators who make up the Helpline Oversight Panel (the “Panel”) gets a notification. Panel membership is listed below:

Figure I.

Helpline Oversight Panel	
<u>Title</u>	<u>Department</u>
Chief Compliance Officer	Compliance and Ethics
AVP / Chief Audit Executive	Internal Auditing and Management Consulting
Senior Associate Vice President Human Resources/Chief Human Resources Officer	Human Resources
<i>General Counsel serves as Advisor/ Counsel to Oversight Panel</i>	<i>General Counsel</i>

3.2. The Panel will have the responsibility to convene and make “threshold determinations” as to whether the allegation(s) constitute a violation of University policy, code of conduct, or any laws or regulations to which the University can be held liable. In short, the Panel determines if the report has merit.

3.3. If the threshold determination concludes that there is sufficient cause to investigate the report further, the Panel will delegate the case to the most appropriate Helpline Partner, who will conduct the case review and lead any subsequent investigation(s).

3.4. The Panel will make a threshold determination *within 10 business days*³ of the date a report is received.

² For the purposes of this document the term “report” represents any issue, compliant, violation, etc. that is received via the UWF Integrity Helpline.

³ University, State, and Federal Holidays, and weekends are not considered “Business Days.”

- 3.4.1. A threshold determination consists of determining the validity of the report and assigning a responsible “Case Owner.”

4. **INITIAL RESPONSE: WHAT TO DO AFTER THE THRESHOLD DETERMINATION**

4.1. The following rules describe UWF’s standard operating procedures for responding to incoming reports:

4.1.1.1. The Chief Compliance Officer must post an initial response via the “Follow-ups” section of the EthicsPoint system *within one business day* of receiving the report, informing the complainant that their report has been received and is under active review.

4.1.1.1.1. No additional information should be included in the Initial Response unless deemed appropriate by the Helpline Oversight Panel.

4.1.1.1.2. If the Chief Compliance Officer cannot fulfill this duty, the responsibility falls to the Co-System Administrator, or other member of the Helpline Oversight Panel, depending on availability.

5. ASSIGNMENT OF CASES: HOW AND WHEN TO APPOINT HELPLINE PARTNERS TO A CASE

5.1. Once a report has passed the initial intake process, the Panel will delegate the case to one or more of the following Helpline Partners (“Partners”). Below is a figure that outlines UWF’s Helpline Partner structure.

Figure II

Subject Matter Expert	Area(s) of Expertise
Associate Athletic Director	Athletics
General Counsel	Legal/ Regulatory Matters
Executive Director/ Chief Information Security Officer	Information Technology
Vice Provost	Academic Issues
Equal Opportunity Officer	Title IX/ Equal Employment Opportunity/ Sexual Harassment and Discrimination
Director, Environmental Health & Safety and/ or Chief of Police	Health and Safety
Associate Vice President, Research Administration and Engagement	Research Integrity
Senior Associate Vice President, Human Resources	Human Resources
Chief Audit Executive and/or AVP/ Controller	Financial Issues/ All Other Complaints

6. ONGOING COMMUNICATIONS: WHAT TO DO ONCE A CASE HAS BEEN ASSIGNED

6.1. Once the case is assigned, they are authorized to investigate as they deem appropriate. Ongoing communication with the complainant and the Chief Compliance Officer includes:

6.1.1. Monitoring case details online for any complainant comments/questions.

6.1.2. Responding to inquiries promptly.

6.1.3. Notifying the Chief Compliance Officer when the investigation has closed.

6.1.4. Notifying the Chief Compliance Officer to close the Helpline Case within the EthicsPoint system.

Important Note:

Regarding legal guidance: If advanced legal advice is needed or something appropriate is required, Partners are encouraged to contact General Counsel for guidance.

Whether or not to pursue additional assistance from General Counsel will be left to the discretion of the case assignee; however, assignees are encouraged to err on the side of caution at all times due to the sensitive nature of Helpline cases and UWF's complex regulatory environment.

Requests should always try to protect the complainant's anonymity and the confidentiality of the case details. Requests should be submitted to General Counsel by referring General Counsel to the EthicsPoint case identification number or by simply requesting that the attorney contact you directly by phone or in person. Helpline Partners shall never include case details, except for the case identification number, in any form of electronic communication.

7. **RESPONSE, RESOLUTION, AND REPORTING: HOW TO PROPERLY DOCUMENT AND RESOLVE ETHICSPoint CASES**

- 7.1. The EthicsPoint “Case Notes” section is available for users to document the investigative process; however, documenting specific case details via EthicsPoint is ***not*** recommended.
- 7.2. Users should use the Case Notes section only to inform the Chief Compliance Officer and/or the Helpline Oversight Panel of the general status and progression of each case. Users should never use this section to document case-specific details, particularly any personally identifiable information that could compromise the reporter’s anonymity and the confidentiality of the report.
- 7.3. The case assignee is responsible for documenting the case processes in their designated UWF departmental network drive, created and maintained by the Office of Information and Technology Services (“ITS”).
 - 7.3.1. By no means should any Helpline documentation ever be stored on a local hard drive or portable memory device⁴.
- 7.4. The case assignee is responsible for notifying the Chief Compliance Officer when a case is closed.

⁴ The Helpline is subject to Sunshine Laws and can be viewed as public records. In order to maintain anonymity and the confidentiality of Helpline cases all case review and investigative documents must be stored on a secure drive that has been established by ITS.

8. PROCEDURE FOR MANAGING HELPLINE ABUSES, SUCH AS REPEATED, MERITLESS REPORTS:

8.1. How to respond to exceptional and outlying cases will be determined by an Ad Hoc Committee. Below is a figure that outlines the Ad Hoc Committee structure:

Figure IV

Title
Staff Senate President
Faculty Senate President
Chief Compliance Officer
Senior AVP Human Resources
Chief Audit Executive
Advisor/ General Counsel

9. PROCEDURE FOR WHEN A MEMBER OF THE HELPLINE OVERSIGHT PANEL IS INDICATED IN A HELPLINE REPORT:

9.1. If a Helpline Oversight Panel member is named in a Helpline report, the case will be referred to one of the following departments to ensure an independent, objective review.

9.2. . This determination is dependent on the named person:

9.2.1. Office of Internal Auditing and Management Consulting

9.2.2. Office of the General Counsel

9.2.3. Human Resources

9.2.4. Office of Compliance and Ethics

10. **BEST PRACTICES:** THE FOLLOWING “BEST PRACTICES” SHOULD BE FOLLOWED WHENEVER POSSIBLE. THESE INDUSTRY-ACCEPTED STANDARDS HELP ESTABLISH TRUST AND BOOST ETHICSPoint’S REPUTATION.
- 10.1. Case assignees should retain documentation within their departmental shared drive (often referred to as the network drive) that was established by UWF’s ITS team, as UWF actively monitors these drives for security threats.
- 10.2. Documentation should NEVER be stored on portable storage devices or via cloud-based storage services.
- 10.3. Users shall never send Case Details via electronic communications such as email or text messaging.
- 10.3.1. The only information transmitted via electronic communication is reference(s) to the case number(s).
- 10.4. Whenever possible, assignees should make every effort to maintain confidentiality, including *after* a case is closed.
- 10.5. When responding to a case deemed invalid or inappropriate for EthicsPoint, Helpline Partners should provide an informed and compassionate response and indicate where such complaints should be directed.
- 10.5.1. A case should NEVER be closed without providing feedback to the complainant via the EthicsPoint “Follow Up” function
- 10.5.1.1. Examples:
- 10.5.1.1.1. *An investigation has been completed and appropriate steps have been taken. Due to the confidential nature of the Helpline, no further information can be provided at this time. Thank you for your report.*
- 10.5.1.1.2. *“Your report has been reviewed and appropriate action has been taken or referred to the appropriate office. Because personnel and other matters may be confidential, we may not be able to provide specific information regarding the outcome.”*
- 10.6. The Compliance Office may periodically coordinate a Helpline Culture Survey to gauge employee opinion, buy-in, and to encourage usage.

DEFINITIONS:

Case Notes: A subsection of the EthicsPoint system where Helpline Partners provide status updates throughout the course of their casework.

Case Owner: Helpline Partner assigned to review a report and carry out any investigations deemed appropriate.

Complainant: Any University employee or group who submits a report via the EthicsPoint system.

EthicsPoint Privacy: The information entered into the EthicsPoint online system is accessible only to the System Administrators and the Helpline Partner(s) assigned to the case (if any). Neither the complainant nor other Helpline Partners can view any case details unless granted permission by the System Administrators, i.e., the Chief Compliance Officer or the Chief Audit Executive.

Follow-ups: Is a subsection of the EthicsPoint system that allows users to ask questions and/ or communicate with the reporter.

Helpline Partner: The Subject Matter Expert assigned to handle cases for a specific regulatory area of incoming reports.

Helpline Oversight Panel: A subcommittee of the Helpline that is responsible for the initial “triaging” of all incoming reports, including making the threshold determination. The Helpline Oversight Panel can quarantine and/or escalate any report deemed an immediate threat to the University.

Named Person: Individual accused of a workplace violation or of suspected wrongdoing.

Report: Any issue received via the UWF Integrity Helpline.

Threshold Determination: A determination as to whether or not a report has sufficient factual information to move forward with additional information-gathering and/or investigation and assigning a responsible “Case Owner.”

Questions/Concerns:
If this document has failed to address any possible outcomes or questions, please contact the Chief Compliance Officer at mpackard@uwf.edu or 850.857.6070.



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