



CITATION REFERENCE

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Policy: Ethics Hotline and Reporting Wrongdoing

Policy Statement

The College of Coastal Georgia (CCGA) is committed to the highest ethical and professional standards of conduct in pursuit of its mission and in support of the University System of Georgia (USG) mission to create a more educated Georgia. Accomplishing these missions demands integrity, good judgment, and dedication to public service from all members of the CCGA community.

Members of the CCGA community have an affirmative duty to report wrongdoing in a timely manner and to refrain from retaliating against those who report violations or assist with authorized investigations.

CCGA also is committed to preventing and detecting fraud, waste, abuse, and other forms of wrongdoing and taking action when wrongdoing occurs. It is the policy of CCGA to refer all criminal acts to law enforcement for investigation.

The CCGA Ethics Policy governs only official conduct performed by or on behalf of CCGA. Violations of the CCGA Ethics Policy may result in disciplinary action including dismissal or termination.

Reason for Policy

CCGA recognizes that each member of the CCGA community attempts to live by his or her own values, beliefs and ethical decision-making processes. The purpose of this policy is to guide members of the CCGA community and sets forth a reporting mechanism for Hotline complaints; however, depending on the nature of the complaint, additional CCGA policies may detail the exact process to follow for investigation and resolution of a specific Hotline complaint. For example, Hotline complaints alleging sexual harassment, academic misconduct, poor work performance, and conflicts with other employees will be investigated according to the applicable procedures set forth in the corresponding College policy.

Entities Affected By This Policy

The CCGA Ethics and Reporting Wrongdoing Policy applies to all members of the CCGA community, including:

1. All individuals employed by, or acting on behalf of, CCGA, including faculty, staff, students, volunteers, vendors, contractors, and subcontractors; and,
2. Members of the governing boards and employees of all cooperative organizations affiliated with CCGA.

Who Should Read This Policy

All CCGA faculty, staff, and students should read and follow this policy.

Contacts

Contact	Phone	E-Mail
Director of Human Resources	(912) 279-5740	hr@ccga.edu

Website Address for this Policy

<http://www.ccgga.edu/uploaded/Policy/files/EthicsAndReportingWrongdoingPolicy.pdf>

Related Documents

[Board of Regents Policy Manual](#)

[Board of Regents Business Procedures Manual](#)

[Board of Regents Human Resources Administrative Practice Manual](#)

Definitions

- **Abuse:** The intentional, wrongful, or improper use of resources. Abuse may be a form of wastefulness, as it entails the exploitation of “loopholes” to the limits of the law, primarily for personal advantage.
- **Accused:** The person named in a report / complaint of wrongdoing.
- **Fraud:** A false representation of a matter of fact that is intended to deceive another. A fraudulent act may be illegal, unethical, improper, or dishonest and may include, but is not necessarily limited to:

- Embezzlement
 - Misappropriation
 - Alteration or falsification of documents
 - False claims
 - Asset theft
 - Inappropriate use of computer systems, including hacking and software piracy
 - Bribery or kickbacks
 - Conflict of interest
 - Intentional misrepresentation of facts
- **Malfeasance:** Any conduct or act carried out by a public official that cannot be legally justified or conflicts with the law including, but not limited to, fraud, waste, and abuse.
 - **Reporter / Complainant:** The person who files a Hotline report of wrongdoing.
 - **Retaliation:** Any action or behavior that is designed to punish an individual for reporting concerns or wrongdoing, cooperating with an investigation, participating in a grievance or appeal procedure or otherwise objecting to conduct that is unlawful, unethical or violates CCGA and/or USG policy. Retaliation includes, but is not limited to, dismissal from employment, demotion, suspension, loss of salary or benefits, transfer or reassignment, denial of leave, loss of benefits, denial of promotion that otherwise would have been received, and non-renewal.
 - **Waste:** The expenditure or allocation of resources in excess of need that is often extravagant or careless.

Overview

I. Conduct to Report

Per USG policy, CCGA employees have an affirmative responsibility to timely report wrongdoing. Wrongdoing is defined in this policy as violation of CCGA 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 CCGA Code of Conduct violations, discrimination, harassment, research misconduct, academic misconduct, and policy violations. Fraud, waste, and abuse, as well as harassment of any kind are of special concern to CCGA; as these can impact our stewardship responsibilities and the well-being of individual in the campus community.

II. Where to Report

Circumstances presenting an immediate threat to life or property or that are obvious criminal acts should be immediately reported to law enforcement.

Other wrongdoing or concerns should be reported through the administrative processes and procedures established by existing CCGA policies and handbooks. Unless otherwise indicated or circumstances make it inappropriate (e.g., the supervisor is engaged in wrongdoing), employees should report wrongdoing through their supervisory chains. Other reporting avenues, however, are always available, including Campus Police, Human Resources, Business Affairs, and the Director of Internal Audits. In keeping with 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 at <https://ccga.alertline.com/gcs/welcome> and by telephone at 1-877-516-3422.

III. Protection against Retaliation – Whistleblower Protection

CCGA employees may not interfere with the right of another employee to report concerns or wrongdoing and may not retaliate against an employee who has reported concerns or wrongdoing, has cooperated with an authorized investigation, has participated in a grievance or appeal procedure, or otherwise objected to actions that are reasonably believed to be unlawful, unethical or a violation of CCGA or USG policy. Violations of this policy may result in disciplinary action, which may include the termination of employment.

a. 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 up to and including termination.

b. Confidentiality

All employees involved with a hotline complaint are accountable and responsible for maintaining confidentiality and a need to know basis. 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 their reporting chain, and when doing so, should not attempt to influence another employee's responses during an investigation, should take measures to secure the investigative file so that its contents cannot be accessed by others, and should not report on or release any information about the incident to internal or external parties without approval from legal representation.

All CCGA employees must ensure they comply with state and federal laws regarding whistleblower protection.

IV. Investigation of Malfeasance

The USG Office of Internal Audit and Compliance has the primary obligation for investigating reported malfeasance involving the University System Office, institutional senior administrators, and institutions without an institutional internal auditor. Institutional internal audit departments have the primary obligation for malfeasance investigation at institutions.

V. Management of Hotline complaints

a. Hotline Coordinator

The Director of Human Resources and Auxiliary Services is designated as the CCGA Hotline Coordinator.

b. Hotline Triage Team

The CCGA Hotline Triage Team is composed of the Director of Human Resources & Auxiliary Services, the Vice President of Business Affairs, and the Director of Internal Audits, all of whom have completed the NAVEX on-line training. The Triage Team may invite heads of CCGA schools, departments, and offices not involved in the investigation to serve on the team to evaluate a particular complaint within that head's area of responsibility or expertise. The Triage Team is responsible for monitoring the Hotline and ensuring appropriate remediation of all hotline issues.

c. Review and assignment of Hotline complaints.

- Within 48 hours of receipt of a report / complaint from NAVEX operators, the Hotline Coordinator will respond to the [reporter / complainant](#), acknowledging receipt of the complaint; if needed, request additional information to ensure proper evaluation; and, notify the Triage Team.
- The Triage Team will meet as needed to evaluate each report / complaint. The purpose of the evaluation meeting is to review the substance of the report / complaint and the parties involved to determine the appropriate assignment for investigation and resolution.
- Reports / complaints received through the Hotline are assigned for investigation in the same manner as face to face complaints according to existing CCGA policies: When a report / complaint is received that is covered by an existing CCGA policy and complaint procedure, it will be assigned, investigated, and resolved pursuant to such policy. In such a case, the Hotline Coordinator will document the assignment and close the report / complaint in the NAVEX system.
- Reports / complaints received for which there is no existing CCGA policy and complaint

procedure will be assigned on a rotating basis to a member of the Triage Team for investigation and resolution. No report / complaint shall be assigned to a Triage Team member for whom there is a perceived conflict of interest, and that member shall have no further access to the report / complaint.

- Reports / complaints involving potential fraud, waste, and abuse by an employee will be reported by the Director of Internal Audits to the USG Office of Internal Audit and Compliance.
- Reports / complaints involving potential criminal malfeasance by an employee will be reported by the Director of Internal Audits to the USG Chief Audit Officer once an initial determination has been made that such malfeasance may have occurred.
- Reports / complaints involving potential malfeasance by members of the CCGA executive management shall be referred for investigation to the USG Office of Internal Audit and Compliance.

VI. Investigating reports of wrongdoing

a. Case Manager

The Case Manager for the investigation is the Triage Team member to whom the Hotline report / complaint has been assigned. As Case Manager, he or she shall

- If and when doing so will not compromise the integrity of the investigation, notify the accused that a report / complaint has been filed via the Hotline and that it is under investigation.
- Notify the head of the accused's school, department or office of the existence of the report / complaint regarding a subordinate.
- Ensure that all persons contacted regarding the investigation are made aware of the CCGA policy prohibiting retaliation and the CCGA confidentiality policy.
- Conduct and manage the investigation of the report / complaint.
- Ensure that the investigation and resolution of the report / complaint are accomplished in a proper and timely manner. CCGA's goal is to have the matter concluded within 60 days from the date of the initial receipt of the report / complaint by the Hotline Coordinator.
- Notify the reporter of the resolution of the report / complaint and action(s) taken, if any.

b. Investigation

In conducting the investigation, the Case Manager shall

- Timely communicate regarding the status of the investigation with all appropriate parties, including the reporter / complainant, if self-reported, and the accused if and when doing so will not compromise the integrity of the investigation
- Interview the reporter / complainant, if self-reported
- Interview the accused
- Interview others named in the report / complaint if a witness or if necessary to substantiate or refute the allegation(s)
- Document all relevant information in the case file
- Draft a report of the investigation to include relevant parties, summary of the conduct of the investigation, established facts, conclusions, and, if any, recommended corrective action to be taken pertaining to the accused

c. Corrective action

Corrective action includes, but is not limited to, recommended training, retraining, counseling, reprimands, suspensions and the termination of employment, consistent with the CCGA policy and other applicable Board of Regents policies.

- Any recommended corrective action pertaining to a CCGA employee will be taken by or coordinated with the Director of Human Resources. The Director of Human Resources will promptly inform the Case Manager of the corrective action taken and when it was completed.
- The Case Manager will promptly add corrective action(s) taken and date(s) of completion to the report of investigation and deliver the investigation case file to the Director of Human Resources.
- The Director of Human Resources and Auxiliary Services will provide a copy of the report of investigation to the accused.
- If during the course of an investigation the Case Manager determines that reasonable grounds exist to believe that an employee other than the accused has committed wrongdoing, the report of investigation will reflect this, and the matter will be referred to the Triage Team for review and assignment for investigation.
- If during the course of an investigation the Case Manager determines that reasonable grounds exist to believe that a student has violated the Student Code of Conduct, the report of investigation will reflect this, and the matter will be referred to the Office of Student Affairs for resolution.

d. Closing the case

Once all necessary investigative and corrective action, if any, have been completed and properly documented and the reporter/ complainant, if self-identified, has been notified, the Hotline Coordinator shall make the required entries on the hotline software to properly document the date on which the case is closed.

e. Tracking Hotline reports / complaints

CCGA will analyze, track and monitor reports to identify trends or problem areas. Updates regarding the number and types of cases shall be provided by the University System Office to the Board of Regents.

Responsibilities

The responsibilities each party has in connection with the Ethics and Reporting Wrongdoing Policy are:

Party	Responsibility
Triage Team	Ensure compliance with this policy.

Forms

none

Appendices

none