MAKING THE RIGHT CHOICES

Each of us must use common sense and good judgment. No set of policies can address every decision or transaction we will face in our daily University activities. If you have a question about the right course of action, review Standards for Business Conduct and relevant University policies; contact your supervisor or find other knowledgeable University officials to contact at www.northwestern.edu/ethics; or report your question or concern to EthicsPoint®, the University’s hotline, at www.ethicspoint.com or 866-294-3545.

COMPLIANCE WITH STANDARDS IS EVERYONE’S RESPONSIBILITY

As members of the Northwestern University community, it is our responsibility to conduct our activities with the highest standards of conduct in mind. This requires our personal commitment to becoming familiar and complying with relevant University policies and to obeying laws and regulations. The University’s Standards for Business Conduct provides a framework for administering University resources and establishes guidelines for acceptable standards of behavior.
WHAT ARE COMPLIANCE ISSUES?

Compliance issues arise from situations, activities, and transactions that could potentially violate federal, state, or local laws and regulations or University policies and procedures. Potential noncompliance might involve:

- academic dishonesty/misconduct
- athletics
- conflict of interest
- criminal activity
- discrimination or harassment
- environmental issues
- falsification of research efforts
- financial matters
- fraud
- information technology
- intellectual property infringement
- life safety and fire code issues
- misrepresentation of academic credentials
- research grants management and appropriation of funds
- research involving animal and human subjects
- retaliation
- scientific misconduct in research
- sexual harassment
- student grades and academic transcripts
- theft
- timesheet abuse
- unsafe conditions
- workplace threats and violence

WHO CAN HELP ME WITH MY COMPLIANCE CONCERNS?

Speak to your supervisor, department chair, dean, or central administration personnel to solicit their support and help. If you feel uncomfortable discussing any matter with your supervisor, however, go to the University's ethics and compliance web site at www.northwestern.edu/ethics. The site provides University policy links and contact information for any questions about those policies. The site also includes information about the hotline operated for the University by EthicsPoint.

What if I only suspect something is wrong?

Most instances of noncompliance are discovered through reports from honest people who are not sure of all the facts. This type of report is not only acceptable, it is encouraged. EthicsPoint will take the information you provide and promptly forward it to the appropriate University officials for review. Any suspected problems or complaints reported via EthicsPoint will be reviewed in accordance with current University procedures, including those described in the faculty, staff, and student handbooks.

How does EthicsPoint work?

EthicsPoint is a phone- and web-based resource available to the Northwestern community 24 hours a day, 365 days a year. EthicsPoint is under contract with the University to provide specially trained personnel to receive all phone- and web-based reports. When you file a report with EthicsPoint, you will be asked to describe the suspected compliance problem in as much detail as possible. Upon completion, your report information will be relayed promptly to the appropriate University officials.

What type of situations should be reported to EthicsPoint?

Reports should be made in good faith and address misconduct rather than employee dissatisfaction. Any issue that appears to be in violation of the laws, regulations, and policies in the University's Standards for Business Conduct should be reported. EthicsPoint is not a 911 or emergency service. Do not use EthicsPoint to report events presenting an immediate threat to life or property or other emergencies. Reports submitted through EthicsPoint may not receive an immediate response. If you require emergency assistance, please call 911.

Are there tip-offs that there might be compliance issues?

Any of the following statements might be a warning sign of noncompliant behavior:

"Well, maybe just this once ..."
"No one will ever know ...
"It doesn't matter how it gets done, as long as it gets done."
"Doing it the right way takes too long."
"Everyone does it."
"No one will get hurt."
"We don't have this conversation."

Am I required to identify myself?

No. You do not have to reveal your identity to use EthicsPoint. However, actions that the University may take in response to certain types of reports might be limited if you do not want your identity known.

Can the EthicsPoint report be traced back to me?

No. Calls are not traced or recorded. No information linking your computer to EthicsPoint is available, since EthicsPoint does not generate or maintain any internal connection logs with IP addresses. No one will know you contacted EthicsPoint unless you tell them or willingly identify yourself.

What protection do I have when I report?

University policy prohibits retaliatory action for reporting or inquiring about potential breaches of University policies or for seeking guidance on how to handle suspected breaches. Reports will be handled as promptly and discreetly as possible, with facts made available only to those who need to know to investigate and resolve the matter. EthicsPoint and the University are committed to safeguarding the confidentiality of individuals who submit reports.

How do I know an investigation is taking place based on my report?

When you file a report online at www.ethicspoint.com or by dialing 866-204-3545, you receive a unique report key, and you choose your own password. You can then return to the EthicsPoint system, either by Internet or phone, and access your report to answer questions, add information, or check on the progress of the investigation. The results of most reports are not made public due to the need for confidentiality, but they are reported to senior University officials, and corrective action plans are implemented as soon as possible. The specific action taken will depend on the nature and the severity of the violation.

Go to Northwestern's ethics and compliance information web page www.northwestern.edu/ethics if you have any compliance questions or concerns.

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