

# **Compliance Matters**

Spring 2018 Special Edition

# **Ethics at Montgomery College**



True or False? Organizations with strong ethical cultures outperform other organizations and experience high employee morale and engagement.

**It's true!** Studies have shown that an ethical culture positively

impacts the success of an organization, and that organizations with strong ethical culture outperform other organizations.

### What is an ethical culture?

According to the Ethics and Compliance Initiative, an ethical culture is one where employees at all levels are committed to doing what is right and successfully upholding values and standards. Ethics culture includes ethical leadership (tone at the top), supervisor reinforcement of ethical behavior, and peer commitment to support one another in doing what is right.

# What are the ethical values and standards?

The <u>Montgomery College Code of Ethics</u> expresses the ethical standards for all College employees through College Policy <u>31000-Code of Ethics</u> and <u>Employee Conduct</u>. The standards include: Accountability, Civility and Collegiality, Compliance, Fairness, Honesty, Respect, and Stewardship.

### Does the Code of Ethics include students?

No, the Student Code of Conduct speaks to students; the Code of Ethics is for employees.

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Office of Compliance, Risk, and Ethics

Visit us online:

montgomerycollege.edu/ compliance



Supporting the Montgomery College Code of Ethics serves to enhance an ethical environment and promote civility, excellence, and integrity in our work and with one another.

# Who is responsible for the Code of Ethics?

Everyone is! It is every employee's responsibility to uphold the Code of Ethics and to encourage high standards of ethical behavior and decision-making by all.

### What is an ethical decision?

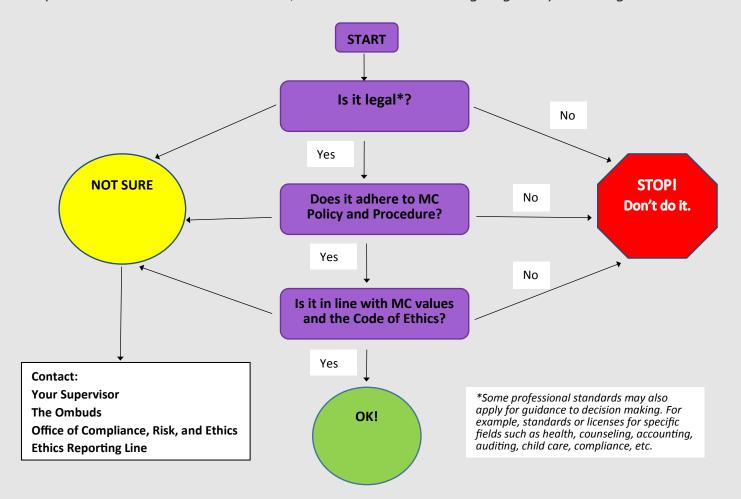
Decisions that involve ethical considerations. Factors to be considered include the following:

- Impact of the action or decision on others or relationships with them (altruistic considerations)
- Determination of the "right thing to do" as defined by the values and principles which apply to this situation (idealistic considerations)
- Potential consequences of the action or decision (individualistic considerations)
- Business consequences of this action or decision (pragmatic considerations)

\*Source: Ethics and Compliance Initiative

### **Making Ethical Decisions**

When presented with an ethical dilemma, think about the following to guide you through.



# **Reporting Line**

### **Why Should I Report Ethical Concerns?**

Employees are expected to report violations of the Code of Ethics and Employee Standards of Conduct. Reporting violations is important to uphold the ethical standards that form the foundation of the Code of Ethics. Prompt reporting of misconduct allows the College to act quickly to address potential issues.



Employees with ethical concerns are encouraged to talk with their management as a first step. For those that

choose otherwise, employees can make a report using the College's confidential and anonymous third-party.

EthicsPoint toll-free number: 844-572-2198

**EthicsPoint:** online reporting

Even if you are not certain that misconduct has occurred, please report the concern without delay. Reports will be reviewed by the appropriate office to determine whether misconduct did in fact occur.

### What protections exist for making a report of a violation?

The College is committed to protecting individuals from interference with making a protected disclosure and from retaliation for having made a protected disclosure or for having refused an illegal order. No individual who in good faith reports a violation or suspected violation shall thereby suffer harassment, retaliation, or adverse employment, academic, or educational consequence. For more information, please consult Montgomery College's Policy 61008–Reporting Suspected Fiscal Irregularities or Fraud with Whistleblower Protection.

# How do I report a concern?

Employees are encouraged to report suspected wrongdoing. If you see something, say something! The first option to report a concern is to take it to your manager. Employees who prefer another option, can contact EthicsPoint to speak up and submit a good faith report.

When using EthicsPoint, employees can share their name or report anonymously. It is up to reporters whether they want to report anonymously or share their name. All names are kept strictly confidential by those reviewing the information in EthicsPoint. At no point does a report that is submitted anonymously through EthicsPoint reveal who has submitted the report.

It is helpful for employees to provide sufficient information in the report to review the concern appropriately.

After an employee completes the report, a unique code is assigned called a "report key." It is important to write down the report key and password and keep them in a safe place. Employees use this report key and password to check on the status of the report for feedback or follow-up questions.

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### What happens after a report is submitted?

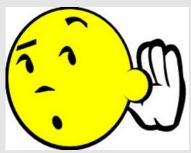
- Once an employee submits a report, EthicsPoint forwards the concern to the Office of Compliance, Risk, and Ethics through a confidential online portal, managed by EthicsPoint.
- Certain staff in the Office of Compliance, Risk, and Ethics review the report and begin to look into the concern. Access to EthicsPoint is tightly controlled and reserved for only a few College employees who are involved in the process to resolve the issue.
- Confirmation is sent back through EthicsPoint to the person who reported.
- After reviewing the concern, the Office of Compliance, Risk, and Ethics will either look into it directly or refer it to the appropriate office for further review.
- Questions and updates regarding the concern are sent to the reporter through the EthicsPoint system. It is important for employees to save and use the report key and password provided to check the status of their report and respond to follow-up questions as review of the case progresses.

### How will I know the concern has been resolved?

If the concern is referred to another office, the Office of Compliance, Risk, and Ethics tracks the timely progression of the concern toward resolution or closure.

The reporter would be notified through the EthicsPoint system when the review of a concern has been completed. Due to the confidential nature of the process, specific details regarding the outcome and resolution remain confidential and are not shared.

### We Heard You!



10, 2018.

# Thank You for Speaking Up!

The Focus on Ethics survey was the last survey of the three employee surveys this year. The survey was open for two weeks, from February 28 to March 10, 2018; and 971 respondents, or 32% of the employee population responded. All survey responses were anonymously collected by Quantisoft, a third party survey company. The survey responses have been reviewed and analyzed. A collegewide memo regarding the survey results was shared from Dr. Pollard on May

# What are the next steps?

The Focus on Ethics survey results have been reviewed in combination with the results of the Equity and Inclusion survey, the Employee Engagement survey, and the Ombuds 2017 Annual Report, as well as other data points and College assessments. Recommendations that respond to the survey results and employee comments have been sent to Dr. Pollard and the senior leadership team.



# ROADMAP FOR EMPLOYEES TO ADDRESS ISSUES

Do you have a concern you feel needs to be addressed? This document provides a roadmap regarding where you can go for assistance and resolution.

**Contact your supervisor or manager with your concern.** Supervisors and managers are your first line of communication.

### Ombuds-Guidance at any time.

- Confidential, neutral, independent, and informal resource with whom you can discuss any and all workplace issues
- Offers discussion and coaching on workplace issue resolution, strategies, and options
- Refers employees to other MC resources

Ombuds@montgomerycollege.edu

#### **EthicsPoint Reporting Line**

- Submit concerns anonymously and confidentially
- Managed by the Office of Compliance, Risk, and Ethics

montgomerycollege.ethicspoint.com 844-572-2198

#### **Intellectual Property Concerns**

Contact the Dean of the relevant academic department

#### **Additional Resources**

- · Governance Councils
- · Labor Unions-AAUP, SEIU, or AFSCME

#### **Student Concerns**

Visit the Student Complaint Resolution webpage for policies and procedures about reporting your concerns.

If contacting your supervisor/manager is not possible or appropriate, or you wish to obtain further assistance, then contact the appropriate area listed below. Your options for consultation and resolution may vary based upon your concern.

#### **Human Resources: Employee and Labor Relations** EmployeeRelations@montgomerycollege.edu

- Alcohol or Drug Abuse Benefit Abuse Bias Incidents
- Disability Discrimination Discrimination or Harassment Employee Behavior
- Employee Time Reporting or Time Abuse Incivility Nepotism or Favoritism
- Sexual Harassment Workplace Violence or Bullying

#### Compliance, Risk, and Ethics Ethics@montgomerycollege.edu

- Conflict of Interest Disability Access Issues Ethical Misconduct
- Grants Research Fraud or Misconduct Improper Giving or Receiving Gifts
- Maryland State Ethics Filing and Reporting Questions Protection of Minors
- Regulatory Compliance Violations of College Policies not otherwise identified

#### **Internal Audit**

InternalAudit@montgomerycollege.edu

- Accounting and Auditing Matters
- · Falsification of Contracts, Reports or Records
- Fraud Theft/Embezzlement
- · Waste, Abuse, and Misuse of Institution Resources

# IT Privacy & Cybersecurity Compliance ITSecurity@montgomerycollege.edu

- Data Privacy Inappropriate Use of Technology
- Account Compromise/Credential Theft

#### **Environmental Safety**

EnvironmentalSafety@montgomerycollege.edu

• Occupational Safety Concerns • Environmental Related Issues

#### Libraries

libguides.montgomerycollege.edu/copyright

• Copyright Questions and Concerns

### Office of Public Safety and Emergency Management

Germantown Campus: 240-567-7777 Rockville Campus: 240-567-5111

Takoma Park/Silver Spring Campus: 240-567-1600

**Central Services: 240-567-9140** 

- $\bullet \ \mathsf{Physical} \ \mathsf{Safety} \ \mathsf{and} \ \mathsf{Protection} \bullet \mathsf{First} \ \mathsf{Aid} \bullet \mathsf{Emergency} \ \mathsf{Assistance}$
- 24-hour Escort Service (upon request) Lost and Found

Please contact the Office of Compliance, Risk, and Ethics if your concern is about one of these offices or a lack of response to a concern.

Please contact the Chief of Staff/Chief Strategy Officer in the Office of the President if the focus of your concern is about the Office of Compliance, Risk, and Ethics.

April 2018



# Office of Compliance, Risk, and Ethics

e-mail: compliance@montgomerycollege.edu

#### Vicki Duggan

Chief Compliance, Risk, and Ethics Officer CT C417 240-567-7291 vicki.duggan@montgomerycollege.edu

### **Maria Adams Davidson**

Associate Compliance Specialist CT C412 240-567-9155 maria.adams@montgomerycollege.edu

### Julie Martorana

Compliance Specialist and Project Manager CT C413 240-567-7394 julie.foster@montgomerycollege.edu

### **Christopher Moy**

Director of ADA Compliance/Title IX Coordinator MK 315G 240-567-5412 <a href="mailto:christopher.moy@montgomerycollege.edu">christopher.moy@montgomerycollege.edu</a>

#### Kristen Roe

Youth Protection Coordinator CT C418 240-567-4279 kristen.roe@montgomerycollege.edu

### **Goli Trump**

Internal Audit and Advisory Services Director CT C409 240-567-9191 Goli.trump@montgomerycollege.edu