

# ETHICS HOTLINE GUIDELINES

## **SCOPE:**

This policy applies to all Midland ISD employees, including part-time, temporary and contract employees.

## **PURPOSE:**

Midland ISD is committed to the highest possible standards of ethical, moral and legal conduct. This policy aims to provide an avenue for employees to raise concerns knowing they are protected from reprisals for whistleblowing.

## **POLICY:**

The Ethics Hotline Policy covers serious concerns that could have a large impact on Midland ISD, include those that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with District policy; or
- Otherwise amount to serious improper conduct.

Regular District matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

## **SAFEGUARDS:**

### **Harassment or Victimization**

Harassment or victimization of individuals submitting hotline reports will not be tolerated.

### **Confidentiality**

Lighthouse will make every effort to protect the reporter's. The information provided in a hotline report may be the basis of an internal and/or external investigation by our company. A reporter's identity may become known during the course of the investigation.

### **Anonymous Allegations**

The policy allows employees to remain anonymous. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

### **Malicious Allegations**

Malicious allegations may result in disciplinary action.

## **PROCEDURE:**

### **Reporting**

The ethics hotline procedure is intended to be used for serious and sensitive issues. Concerns may be reported via

- Website: [www.lighthouse-services.com/midlandisd](http://www.lighthouse-services.com/midlandisd)
- English: 877-490-0007
- Spanish: 800-216-1288
- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (include District name in report)
- Fax documents: 215-689-3888 (include Midland ISD in report)

Lighthouse will follow applicable laws to protect your identity, however revealing your identity may be inevitable during the course of an investigation. Lighthouse reports are submitted for investigation according to District policies.

### **Evidence**

Although you are not expected to prove the truth of an allegation, the employee submitting the report needs to demonstrate that there are sufficient grounds for concern.

## **INVESTIGATION:**

### **Initial Inquiries**

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

### **Feedback to Reporter**

Whether reported directly to Midland ISD personnel or through the hotline, the individual submitting the report will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received
- Indicating how the matter will be dealt with
- Giving an estimate of the time that it will take for a final response
- Telling them whether initial inquiries have been made
- Telling them whether further investigations will follow, and if not, why not

### **Further Information**

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

### **Outcome of an Investigation**

At the discretion of the District and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.