WHAT WOULD GEORGE SAY?

COMPLIANCE IS EVERYONE’S RESPONSIBILITY!

As faculty, staff, and students of the George Washington University, it is our responsibility to conduct our activities with the highest standards of conduct in mind. This requires our personal commitment to become familiar with and comply with relevant university policies and to obey laws and regulations. In addition, we must strive to uphold the principles of ethical conduct set forth in the university’s Statement of Ethical Principles. These ethical principles encourage us to exercise tolerance and respect for the rights and dignity of others; to maintain integrity; to be responsible and accountable for our actions; to avoid conflicts of interest between our work and our personal affairs; to support an environment in which harassment of others and abuse of power are not tolerated; to exercise stewardship of university resources; to promote a culture in which ethical conduct is recognized and encouraged; and to report violations of laws, regulations, or university policies to the appropriate university officials, to the University Compliance & Privacy Office, or through the Regulatory Compliance Help and Referral Line as described further in this brochure.

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 conduct, review the Statement of Ethical Principles, review the relevant university policies (www.policy.gwu.edu), contact your supervisor or the University Compliance & Privacy Office, or call the Regulatory Compliance Help and Referral Line at 1-888-508-5275.

WHAT ARE COMPLIANCE ISSUES?

Compliance issues relate to situations, activities, and transactions that could potentially violate federal, state, or District of Columbia laws and regulations, or violate university policies and procedures. Examples include violations related to athletic rules/conduct, conflicts of interest, discrimination, financial reporting and controls, financial mismanagement and fraudulent activities, harassment, health and safety issues, information security, political activities, privacy, research, taxation, the work environment, etc.

HOW CAN I TELL IF THERE ARE COMPLIANCE ISSUES?

It would be impossible to publish a list of every possible compliance item, but ask yourself the following questions:

- **Do the actions violate any law or regulation?**
- **Do the actions violate any requirement of an outside agency having supervision over university activities?**
- **Do the actions violate any university policies?**
- **Do the actions present a threat to health and safety?**

If you believe that the answer to any of these questions is YES, then there may be a compliance issue.
WHAT SHOULD BE MY FIRST STEPS?

If you believe that there is a compliance issue, you should first report your concerns to your supervisor. If you are not comfortable going to your supervisor or your previous reports have been ignored, report your concerns to individuals within the organization who are above your supervisor.

The university has several departments that are responsible for various compliance activities. If your concerns are related to university operations or policies, you should contact the appropriate office(s) below:

- **Discrimination**
  - **Staff**  EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION ........................................202-994-9656
  - **Faculty** FACULTY RECRUITMENT AND PERSONNEL RELATIONS ......................................................202-994-6783
  - **Student** DIVISION OF STUDENT AFFAIRS ..................................................202-994-6710

- **Emergency Issues**
  - Emergency issues regarding safety and health should be reported directly to the departments responsible for these matters.

- **Employee-Related Injuries**
  - RISK MANAGEMENT ..............................................................202-994-3265

- **Environmental and Employee Safety**
  - HEALTH AND SAFETY ..........................................................202-994-4347

- **Financial Irregularities**
  - COMPLIANCE & PRIVACY ..................................................202-994-3386

- **Information Security**
  - INFORMATION SECURITY OFFICE ........................................703-726-4262

- **Research**
  - OFFICE OF THE VICE PRESIDENT FOR RESEARCH .................................................................202-994-6255

- **Security**
  - GW POLICE DEPARTMENT
    - EMERGENCY ........................................................................202-994-6111
    - NON-EMERGENCY .................................................................202-994-6110

- **Sexual Harassment and Violence**
  - DEPUTY TITLE IX AND SEXUAL HARASSMENT RESPONSE COORDINATOR ..................................202-994-7440

- **Workplace Conduct**
  - **Staff**  EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION ........................................202-994-9656
  - **Faculty** FACULTY RECRUITMENT AND PERSONNEL RELATIONS ......................................................202-994-6783

If you are uncomfortable contacting someone directly, or if your previous efforts have been ignored, you also have the option of calling the university’s Regulatory Compliance Help and Referral Line at 1-888-508-5275.

WHAT IS THE REGULATORY COMPLIANCE HELP AND REFERRAL LINE?

The Regulatory Compliance Help and Referral Line is a toll-free, 24-hour, 7 day-a-week telephone service that provides the university community with an opportunity to report compliance concerns or to ask questions about compliance issues. This service provides one method of efficiently accessing university resources for resolving specific concerns on a timely basis. These concerns include potential threats to health and safety and suspected misconduct in violation of laws, regulations, university policies, procedures, and requirements of outside agencies having supervision over university activities. This service does not replace existing university programs and procedures responsible for promoting compliance with such laws, regulations, policies, and requirements.

SPEECH AND HEARING IMPAIRED ACCESS

Callers with speech or hearing impairments can access the Regulatory Compliance Help and Referral Line using a TTY phone/machine at 1-877-576-2569.

WHAT HAPPENS WHEN I MAKE A CALL?

When you call the Regulatory Compliance Help and Referral Line, an independent Compliance Risk Specialist (CRS) will gather specific information related to the reported activity. You may be asked for additional information to help identify the issues and concerns. The CRS will forward a detailed report to the University Compliance & Privacy Office, as well as the designated university department responsible for conducting the review, based on the reported activity. The University Compliance & Privacy Office will coordinate the review by the appropriate university department and personnel. You are encouraged to identify yourself to the CRS, because a request for anonymity may limit the university’s ability to respond to your issues and concerns. If you choose to identify yourself during the call, the appropriate university person will contact you directly about your issues and concerns.

If you wish to remain anonymous, the CRS will assign you a unique reference code that will be used throughout the university’s review process. At the end of the call, the CRS will give you a time/date to call back for a status of your report. The results of the review will be relayed back to the CRS who will communicate the response to you during a follow-up call. As mentioned previously, this service does not replace existing university programs and procedures responsible for promoting compliance with such laws, regulations, policies, and requirements.
WHAT WOULD GEORGE SAY?

WHY IS THE REGULATORY COMPLIANCE HELP AND REFERRAL LINE IMPORTANT TO THE UNIVERSITY?

The university is committed to conducting business ethically and in compliance with applicable federal, state, and District of Columbia laws. The Regulatory Compliance Help and Referral Line, with the support of the university community, is an effective way to help the university address potential violations of laws, regulations, and university policies.

WHAT IF I DON’T HAVE ALL OF THE FACTS?

Report your concern(s) even if you are not sure there is a problem. To ensure accuracy and to enable the university to make an informed assessment of your concerns, please provide as many facts as possible. The university will review the information you provided and take appropriate action in response to your concerns.

ABOUT YOUR INQUIRY

All reports of compliance issues will be handled in strict confidence to the extent possible or permitted by law. Your inquiry can be made without fear of retribution. University policy prohibits any retaliation against individuals who report compliance issues in good faith. University policy also prohibits reports made in bad faith or with malicious intent. Violations of either policy may result in disciplinary action.

Be HONEST, FAIR, and TRUSTWORTHY

The Regulatory Compliance Help and Referral Line

1-888-508-5275