

# 2022 Guidelines for Making and Handling Complaints about Possible Violations of the NTL Code of Ethics (8-1-22)

## Introduction

These 2022 Guidelines describe the process for making and handling complaints about possible violations of the NTL Code of Ethics. They are an updated and revised version of the Guidelines issued in 2016 and apply to the 49 Standards of Ethical Behavior included in the 2022-2026 Code of Ethics. The NTL Code of Ethics and these Guidelines are listed on NTL's website ([www.ntl.org](http://www.ntl.org)).

Complaints about possible violations of the NTL Code of Ethics can be made by NTL members, employees, and contractor staff, clients of NTL programs and services, and members of the public. Ethics complaints can be made about possible breaches by NTL members, employees, and contractors.

When a violation of the Code of Ethics by an NTL member, employee, or contractor is determined, accountability to NTL Institute for an ethics violation may include sanctions, such as mandatory additional ethics training, other education, or loss of NTL membership, employment, or contractual arrangement.

The NTL Ethics Committee, the NTL President, and the NTL Board of Directors are responsible for the ethics-complaint process. They commit to handling ethics complaints respectfully, promptly, and confidentially.

## I. Initial Process – NTL Office

1. Complainants about ethics violations are requested to review the NTL Code of Ethics and the Guidelines for Making and Handling Ethics Complaints on NTL's website. ([www.ntl.org](http://www.ntl.org)), prior to making ethics complaints. Persons who wish to get additional information about the NTL ethics-complaint process can contact the Ethics Committee at [ethics@ntl.org](mailto:ethics@ntl.org). Ethics complaints can be initiated by NTL members, employees, and contractor staff, clients of NTL programs and services, and members of the public.
2. An ethics complaint about NTL members, employees, or NTL contractor staff is initiated by a complainant with a written letter of complaint to the NTL President in an envelope marked "CONFIDENTIAL" on the front, bottom-left corner. NTL's mailing address is listed on NTL's website, ([www.ntl.org](http://www.ntl.org)). NTL does not investigate oral or email complaints about ethics violations. The written ethics complaint needs to include:
  - Complainant's name and contact information,
  - Ethical standard(s) of behavior that have been breached,
  - Name and role of the NTL person who has breached the ethical standard(s) of behavior,
  - Specific circumstances about the ethics violation, and
  - Desired individual and/or NTL actions that address the ethics violation.
3. If an ethics complaint is about the NTL President, the complainant is requested to send their letter of complaint to the Chair-Elect of the NTL Board of Directors. This reserves the Chair of the NTL Board of Directors as the point of a possible appeal. All other ethical-complaint letters are addressed to the NTL President.
4. When an ethics-complaint letter is received at the NTL Office, NTL Office staff will send it by priority mail to the NTL President (or Chair-Elect of the NTL Board of Directors). When the NTL President (or Chair-Elect of the NTL Board of Directors) receives the complaint letter they refer the ethics complaint and a copy of the complaint letter to the Chair of the NTL Ethics Committee (or any available member of the Ethics Committee if the Ethics Committee Chair is not available).

5. The NTL President (or Chair-Elect of the NTL Board of Directors) contacts the complainant within 3 days (or 72 hours) after the ethics-complaint letter is received to let the complainant know the status of their complaint.
6. NTL treats the ethics complaint, and its existence, as confidential information, with only the Ethics Committee and the NTL President (or the NTL Chair-Elect if the complaint is about the NTL President), having knowledge of the complaint and of its content.

## **II. Process When a Written Ethics Complaint Is Referred to the Ethics Committee**

1. When the Chair of the Ethics Committee receives a copy of the ethics complaint, they initiate a conference call to the Committee members in which:
  - The Chair presents the ethics complaint.
  - Committee members are given copies of the written complaint and the Committee decides how to handle the ethics complaint and who will conduct the review of the ethics complaint. (At least two members, other than the Chair, conduct the review of the complaint.)
  - The Committee recommends what parties should be interviewed as part of the review of the ethics complaint.
2. The Chair of the Ethics Committee calls and advises the complainant that NTL is exploring their complaint and gives the complainant the names of the Ethics Committee members who will be contacting the complainant.
3. The Chair calls and advises the NTL person(s) being complained about that the complaint exists and the names of the Ethics Committee members who will be contacting them. The NTL person(s) being complained about is given a copy of the written complaint.
4. The Ethics Committee members review the written complaint, and then interview the complainant, the NTL person(s) being complained about, and other parties as appropriate.
5. The Chair of the Ethics Committee initiates another conference call to the Committee during which the information collected, the findings, and the recommendations are discussed, and agreement is reached on the Committee's findings and recommendations.
6. A final report of the Ethics Committee's findings and recommendations is written by the Ethics Committee members conducting the review of the ethics complaint and sent to the Chair of the Ethics Committee and NTL President (or the Chair-Elect of the NTL Board of Directors if the complaint is about the NTL President) in envelopes marked CONFIDENTIAL. At this point in time, the only people who have knowledge that an ethics complaint exists are the Ethics Committee; NTL President (or the NTL Chair-Elect if the complaint is about the NTL President); the NTL person(s) complained about, the complainant; and those involved in the investigation of the complaint.
7. All people with information about the complaint are asked to keep it confidential.
8. The NTL President (or the Chair-Elect of the NTL Board of Directors if the complaint is about the NTL President), in collaboration with Chair of the Ethics Committee, make the final decision on the ethics complaint, depending on whether there has been a violation of the Code of Ethics. (The exception is, that if expulsion from membership is recommended, the case is referred to the Board of Directors at their next meeting.)
9. When a violation of the Code of Ethics by an NTL member, employee, or contractor is determined, accountability to NTL Institute for an ethics violation may include sanctions, such as mandatory additional ethics training, other education, or loss of NTL membership, employment, or contractual arrangement.

10. Once the final decision is made, the following actions are taken:
  - The NTL President calls the complainant and advises the complainant that NTL considers that there has or has not been a violation of the NTL Code of Ethics.
  - If it was determined that there has not been a violation, the reasons are explained, and the complainant is given enough information to demonstrate that the decision process has been complete and fair.
  - If it was determined that there was an ethics violation, the complainant is advised that NTL appreciates them for bringing the ethics violation to NTL's attention, and that NTL is taking appropriate action toward the NTL person(s) involved. Appropriate apologies are offered to the complainant.
11. The Ethics Committee Chair calls the NTL person(s) involved and reports the results of the ethics-complaint review and decision.

### **III. Process for Appeal of an Ethics-Violation Decision**

1. An NTL Member can appeal an ethics-violation decision to three members of the Board of Directors and the Chair of the Ethics Committee. The decision of the three Board members will be final unless expulsion from membership is recommended. Expulsion from membership takes a majority vote of the Board of Directors. Members of the NTL Board of Directors are asked to keep confidential information and decisions involving ethical violations.
2. Decisions about ethics violations by NTL administrative- or support-staff persons are made by the NTL President. NTL administrative- or support-staff persons can appeal a decision about an ethical violation to the NTL President.