Policy 2.13

Responsible Executive: Gretchen Van Natta, VP of HR

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WHISTLEBLOWER POLICY

Contents (if more than three pages)

Best Practices suggest a mechanism for an organization's staff, faculty, students, trustees and others who do business with the organization to report instances of suspected wrong-doing either through established channels or through a confidential hotline. Normally, suspected violations are reported to the Vice President of Human Resources or the Internal Auditors as outlined in the organization policies. This policy complements existing Roosevelt University policies and reporting mechanisms while providing an additional avenue through the confidential hotline to be established. It is an umbrella policy intended for use when one believes wrongdoing has occurred.

This policy supports Roosevelt University's strategic goals as follows:

Goal #5: Maintain the University's Commitment to Financial Sustainability
Goal #6: Create an Overall Image and Reputation of Distinguished Quality

Policy Statement

Roosevelt University recognizes its obligation to its employees and constituents to maintain the highest ethical standards. To protect the integrity of the University's learning community, and to ensure the highest standards of conduct by and among members of the University community, the University will investigate any alleged *Improper Activity*[1] by its employees or students. Anyone found to have engaged in an *Improper Activity* is subject to disciplinary action by the University up to and including dismissal or expulsion, and civil or criminal prosecution when warranted.

All members of the University community are strongly encouraged to report any potential *Improper Activity*. The preferred method of reporting any issue of

[1] As used here and throughout, all capitalized and italicized terms shall have the meaning delineated in Section II of this Whistleblower Policy.

concern is for the employee, student, or other constituent to file a report describing the potential *Improper Activity* and the person or persons involved with the Vice President of Human Resources or the Internal Auditors. To initiate an investigation, the report should be in writing. The University may, in its discretion, investigate any report made orally that is subsequently not made in writing.

Additionally, constituents of the University may report a potential *Improper Activity* through the University's whistleblower hotline when one is uncomfortable reporting the potential *Improper Activity* to the Vice President of Human Resources or the Internal Auditors or if the potential *Improper Activity* involves either the Vice President of Human Resources or Internal Auditors. The University has contracted with a third-party vendor to administer its confidential whistleblower hotline. Protocol will be established to distribute any reports received through the hotline according to a distribution matrix, unless the individual listed in the distribution matrix is also named in the report. In such an instance, the report will be distributed to legal counsel.

Once a report has been filed, the Vice President of Human Resources, the Internal Auditors or legal counsel, shall undertake an investigation by appointing another administrator or other qualified person to conduct the investigation. The Vice President of Human Resources or the Internal Auditors may obtain the assistance of the University's attorneys in the investigation. The report and the identity of the person who filed the report will not be disclosed except when necessary for a full investigation of the report. The investigator shall file a written report of his/her findings with the Vice President of Human Resources, the Internal Auditors, or legal counsel within 28 working days after the report has been made. If the investigatory report cannot be completed within this time frame, the report shall state the reasons for the delay. The person who filed the report will be notified of the findings of the investigation within Ten working days of its filing.

The University will not tolerate any: (i) retaliatory actions against any employee or constituent for making a good faith report of a potential *Improper Activity*; or (ii) direct or indirect use or attempted use of the *Official Authority or Influence* of an employee's position or office for the purpose of interfering with the right of another employee or constituent to make a *Protected Disclosure* directly to the University or through the University's whistleblower hotline.

The University will take whatever action that may be necessary to prevent and correct violations of this Whistleblower Policy; notwithstanding the foregoing, any individual who files a *Baseless Allegation* shall not be protected under this policy.

Reason for Policy

The University's Whistleblower Policy shall incorporate the following definitions:

Baseless Allegation	Any allegation of improper activity made without reasonable cause to believe that the information disclosed is true. Individuals making such allegations may be subject to institutional disciplinary action and/or legal claims by individuals wrongfully accused of such conduct.
Improper Activity	Any activity undertaken by a University Trustee, employee or student which is found, after due process, to be in violation of any applicable local, state, or federal law, rule, or regulation, or University policy or procedure, including, but not limited to, those relating to: corruption; malfeasance; bribery; theft; fraud; coercion; conversion; or misappropriation or misuse of assets.
Official Authority Or Influence	Promising to confer or conferring, any benefit; effecting or threatening to effect, any reprisal; taking, or directing others to take, or recommending, processing, or approving, any personnel action, including, but not limited to, appointment, promotion, transfer, assignment, performance evaluation, suspension, or other disciplinary action.
Protected Disclosure	Any good faith communication that discloses or demonstrates an intention to disclose an alleged *Improper Activity*.

Entities Affected by this Policy

All units of the University.

Web Address

http://www.roosevelt.edu/Policies.aspx

Related Documents

N/A

Implementation

A copy of this University policy shall be distributed to each employee and student annually through employee and student communications such as employee and student handbooks and the University catalogs.

Online Resources and Forms

N/A

Any questions about the University's Whistleblower Policy may be directed to:

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