Policy

Department of Human Resources  Effective Date: August 13, 2010
Previous Date: November 1, 2005

Re:  Whistle Blower

Policy

The University shall maintain an appropriate system for employees, directors, and others, to report concerns of any nature, in a safe and confidential manner. The University will respond appropriately to all reported concerns and incidents.

Background

Charles R. Drew University requires all employees (faculty, staff, administrators) and Board members, to act, at all times, in a manner that is consistent with the highest of professional standards. All employees and representatives of the University must practice honesty and integrity in their conduct, and in the use of University resources and property. The University requires all employees and representatives to comply with all applicable laws, regulations, and University policies.

The University will provide a safe and confidential environment for employees, and other University members, to report (1) any questionable behavior by an employee or representative, (2) any suspected violation of laws, regulations, or policies, (3) fraud, dishonest or misuse of University resources or property, or (4) any inappropriate behavior or action on the part of an employee, employees, or other representatives of the University.

The University encourages all members of the University community to report possible fraudulent, dishonest, or inappropriate conduct.

The University will appropriately investigate and respond to all reports. Anyone found to have engaged in fraudulent or inappropriate conduct will be subject to disciplinary action, up to and including, termination, civil or criminal prosecution, when warranted.
Re: Whistle Blower

Standard

The University will maintain an effective, safe, and confidential system for handling reports of (actual or suspected) fraud, misconduct, misuse of resources or property, violations of law, regulations, or policies, conflicts of interest, any inappropriate conduct, behavior, or action.

Background

The University requires all members, employees and representatives, to act with the highest of professional standards at all times. The University requires employees to practice honesty and integrity in their conduct and to comply with all laws, regulations, and policies in fulfilling their responsibilities.

The University encourages employees and other members of the University community to report any and all questionable acts and behaviors. The University promotes the concepts of shared responsibility and shared governance. All employees and members of the University have an obligation to report questionable acts and behaviors.

There will be No Retaliation or adverse consequences to the employee or University member, who in good faith, reports a concern or questionable act. The Whistle Blower policy is intended to encourage and enable employees and University members to raise concerns within the University for investigation and appropriate action. Any employee or member of the University that retaliates against someone who has reported a concern in good faith will be subject to discipline, up to and including termination, civil or criminal prosecution.

Employees and other University members must Act in Good Faith when reporting questionable acts or behaviors. If an individual knowingly makes false, unsubstantiated, malicious, or reckless statements or accusations, the individual will be subject to serious disciplinary action, up to and including termination, civil or criminal prosecution.

Employees and other University members may make reports anonymously. Reports and investigations shall be kept Confidential to the extent possible, consistent with the need to conduct adequate investigation. Information relating to reports, investigations, and resolutions, shall be treated confidential.
Procedure

1. Employees, or University members, should first discuss concerns with their supervisor. If the supervisor is involved in the concern, or, if the response by the supervisor is not sufficient, then the report should be made to the appropriate administrator. If the administrator is involved, or, if the response by the administrator is not sufficient, then the report may be made in writing or verbally.

2. Verbal reports can be made anonymously to the specified phone number. The phone number will connect to an answering machine. The phone number will be available at Human Resources, Internal Audit, and other areas.

3. Written reports can be made anonymously. They should be addressed to the outside consultant, Human Resources, or Internal Audit. Written reports should not be sent to an individual or department if the individual or department is involved in the concern.

4. Please provide as much detail as possible, written or verbal, in order for the University to conduct an effective review of the concern.

5. The Whistle Blower resolution committee shall consist of, where appropriate, the consultant, University Auditor, Human Resources, and the CFO. Reports that involve any of the committee members will not be shared with that committee member. The matter will be confidential and handled by the other members of the committee.

6. The committee will conduct the review. The committee will provide a report of all incidents to the Audit Committee of the Board of Trustees and to the President. The committee, with approval of the Audit Committee and the President, will resolve all matters.

7. Outside expertise may be retained in the conduct and resolution of reported incidents, as appropriate and necessary.

8. The Audit Committee will provide regular reports to the Board of Trustees on incidents and resolutions.

Responsibilities

1. Employees and all University members have a duty to report inappropriate acts, conduct, and behaviors.

2. The Whistle Blower Committee (WBC) provides information to the University community relating to this policy and the procedures.

3. The WBC conducts all reviews, with consultants and outside experts, as necessary.

4. The WBC provides regular reports to the Audit Committee of the Board and to the University President.

5. The Audit Committee and the President approves all resolutions.

6. The Audit Committee provides regular reports to the Board.

References

Administration
Board of Trustees
Office of the President
Human Resources
Internal Audit

19-01-02