



POLICY AND PROCEDURE

TITLE:	Whistleblower Policy
--------	----------------------

POLICY STATEMENT:

Goodwin University is committed to providing a culture and process that encourages, receives, retains and resolves complaints arising from “whistleblower” communications concerning any questionable accounting or auditing matters, potential fraud or illegal or irregular activities suspected or committed by a fellow employee.

PROCEDURE DETAILS:

1. All employees of the University shall follow the Whistleblower procedure and report any suspected fraudulent activity to the Provost and Dean of Faculty and the VP of Human Resources.
2. All employees of the University shall exercise due care when reporting suspected fraudulent activities.
3. The University will promptly investigate any suspected fraudulent or dishonest activity against the University. The Provost and Dean of Faculty and the VP of Human Resources shall determine the nature, scope, timing and extent of all investigative activities.
4. When appropriate, based on a finding of fraud, Goodwin University shall take appropriate disciplinary actions and pursue legal remedies available under the law against the employee, but not to be limited to, the possibility of termination of employment, restitution, and forwarding information to appropriate authorities for criminal prosecution or other legal remedies.
5. All employees shall be protected from retaliatory actions in accordance with federal and Connecticut laws.
6. The University is empowered to undertake its own investigation or solicit the assistance of its independent auditors, legal counsel or other resources to investigate suspected fraud.
7. All of the University's assets shall be subject to inspection when reasonable suspicion of fraudulent activity exists that makes such inspection appropriate. The University shall have full and unlimited access to all of its employee's contents and possessions including but not limited to furniture and equipment, electronic devices, digital devices, telephonic devices, and all information stored on said devices.
8. There shall be no assumption of privacy during the performance of an investigation of fraud.

Great care must be taken to avoid making accusations that are not based on observable suspicious behavior or credible evidence. When fraud is suspected, personal notes of the factors that give reason to suspect fraud should be made and suspicions reported as provided in these policies and procedures. A person who suspects fraud must not personally undertake any investigation or interrogation of the individual(s) suspected of the fraudulent activity.

- The individual(s) suspected of the fraudulent activity are not to be confronted by the individual(s) who report the suspected fraud.

- The person(s) reporting the suspected fraud must not discuss the suspected fraudulent activity or the reporting of this activity with anyone other than the Provost and Dean of Faculty and the VP of Human Resources.
- When reporting suspected fraudulent activity, provide as many details as possible about the suspected fraud (names, dates, times, descriptions of activity, etc.).
- Reports of suspected fraudulent activities are to be made to the Provost and Dean of Faculty and the VP of Human Resources directly, via voice-mail, and/or via written correspondence. Messages may include the name of the individual reporting the fraudulent activity or may be made anonymously. Any and all messages of a material nature will be communicated to other executive members of the University for action and follow-up.
- Regardless of the outcome of a report of suspected fraud, there shall be no retaliation against the person(s) reporting the suspected fraud. If there is a legitimate reason to believe that retaliatory action has taken following the reporting of a suspected fraud, a report of the suspected retaliation shall be made in the same manner to the Provost and Dean of Faculty and the VP of Human Resources as described in these policies and procedures.

PUBLISH POLICY STATEMENT (CLICK ON BOX NEXT TO OPTION-SELECT ALL THAT APPLY):

FACULTY HANDBOOK

UNIVERSITY CATALOG

STUDENT HANDBOOK

STAFF HANDBOOK

DEFINITIONS:

Fraud: Fraud is defined as a willful or deliberate act with the intention of obtaining an unauthorized benefit, such as money or property, by deception or other unethical or illegal means. Fraudulent acts covered under this policy include, but are not limited to:

- Forgery or illicit alteration of documents (checks, promissory notes, time sheets, expense reports, independent contractor agreements, purchase orders, budgets, etc.)
- Misrepresentation of information on documents.
- Misappropriations of funds, inventory, securities, supplies, or any other asset.
- Theft, disappearance, or destruction of any asset.
- Improprieties in the handling or reporting of money or financial transactions.
- Issuing false or misleading financial statements, tax returns or other forms of financial information whether for internal or external use.
- Authorizing or receiving payments for goods not received or services not performed.
- Authorizing or receiving payment for hours not worked.
- Any apparent violation of Federal, State, or Local laws related to dishonest activities or fraud.

Employee: In this context, Employee is defined as any individual who receives compensation, either full or part time, from Goodwin University. The term also includes any consultant or independent contractor who provides services to the University under a contractual arrangement.

Management: In this context, Management is defined as any officer, administrator, manager, director, supervisor, or other individual who manages or supervises employees, funds, or other resources.

Whistleblower: In this context, Whistleblower is defined as one who raises a concern about or reveals suspected misconduct or wrongdoing occurring in the organization to those in positions of authority.

EXCLUSIONS:

N/A

OFFICES DIRECTLY AFFECTED BY THE POLICY:

Human Resources

HISTORY: Policy created May 2016; Reviewed May 2017; Reviewed October 2019, Reviewed January 2020

EFFECTIVE DATE:	June 1, 2016
RESPONSIBLE OFFICE (ONLY ONE):	Human Resources
REVIEW DATE:	Annually

APPENDIX:

N/A