

MOUNT VERNON NAZARENE UNIVERSITY

Life Changing

Whistleblower Protocol

Purpose

The purpose of the whistleblower protocol is to provide directives and guidance for reporting unlawful or fraudulent activities and to protect Mount Vernon Nazarene University employees (i.e., trustees, administrators, faculty, staff, and students) who make such reports.

Commitment to Integrity

Mount Vernon Nazarene University requires its employees, as defined above, to observe a high standard of personal, business, and academic ethics. In observing those high ethical standards, all employees must act with honesty and integrity in carrying out duties and responsibilities to ensure compliance with all applicable federal, state and local laws and regulations.

The whistleblower protocol operates under the University's broad compliance policy (<http://mvnu.edu/policies/Compliance%20Policy.pdf>) and in harmony with Ohio Revised Code, section 4113.52.

Reporting Responsibilities and Procedures

All employees have a responsibility to report occurrences or suspected occurrences of an unlawful or fraudulent nature, including any criminal offense that is (a) likely to cause an imminent risk of physical harm to persons, or (b) a hazard to public health or safety. If an employee becomes aware in the course of employment of a violation of any federal, state, or local law or regulation by the institution or fellow employee, and it is within the authority of the institution to correct it, [1] the employee shall orally notify his or her supervisor or senior-level administrator.

[2] The individual shall subsequently file with that supervisor or senior-level administrator a written report that provides sufficient detail to identify and describe the violation. If the allegation concerns the supervisor, or the employee feels uncomfortable with giving this information to the supervisor, the employee may make the report to his or her senior-level administrator, who has responsibility and authority to investigate all reported violations.

Handling of Reported Violations

The supervisor or the senior-level administrator, in situations where the senior-level administrator received the complaint, will notify the person making the report within twenty-four (24) hours of receipt of the report. All reports will be promptly investigated and appropriate action will be taken in accord with the results of the investigation. At the discretion of the senior-level administrator, he/she shall advise the President or Chairperson of the Board of Trustees.

Confidentiality

Reports of violations or suspected violations may be submitted on a confidential basis or anonymously. To the extent possible, reports will be kept confidential. The need to conduct an adequate investigation may require disclosure to certain persons with a legitimate need-to-know.

No Retaliation

Anyone filing a complaint in good faith with reasonable grounds for suspecting a violation will not be punished or sanctioned. This protocol is intended to encourage individuals to make reports of known or suspected unlawful or fraudulent activities.

Any retaliation by the University, or a supervisor, toward the initiator of any report made in reasonable good faith will not be tolerated. This includes harassment of any kind including threat of or action involving an adverse employment consequence. Action will be taken against fellow employees who take retaliatory or disciplinary action against an individual who has made a good faith report of a violation. This action may include termination of employment or loss of position after due investigation.

However, any reports made maliciously or knowingly to be false will not be tolerated, and anyone making such a report will face disciplinary action.

Questions

The following individuals can be contacted for questions on the whistleblower protocol as outlined here.

For	Contact
Any question	Unit supervisor
Reporting misuse of the whistleblower protocol	Unit supervisor, Provost and Chief Academic Officer, Director of Human Resources

The following outlines the approval, review, and revision history of the whistleblower protocol.

Version	Approval Date of Version	Version Type
1	Cabinet, April 17, 2006	Initial Release
1.1	Institutional Effectiveness, July 18, 2012	Update to reflect changes in University structure, organization, personnel responsibilities, and policy reorganization initiative