

## OFFICIAL POLICY

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# Whistleblower Policy

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### 1.0 PURPOSE

Wheeling University is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and the University's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from retaliation for 'whistle blowing.'

### 2.0 POLICY

#### 2.1 Definitions:

- 2.1.1 "Whistleblower" - an employee of the University who reports in good faith an activity that he/she reasonably considers to be immoral, unethical, illegal, and fraudulent or in direct violation of federal or state law and/or University policies

#### 2.2 Procedure

- 2.2.1 If an employee has knowledge of, or a good faith concern about, any illegal, dishonest or fraudulent activity, misconduct, wrongdoing, financial Irregularities, or policy violations, the employee should contact his/her immediate supervisor or the Vice President, Human Resources & Compliance. Examples of activities include embezzlement, false claims, inappropriate expenditures, falsification of documents, academic fraud, scientific fraud, and research misconduct.
- 2.2.2 An employee may elect to utilize the "Hotline" to anonymously report such knowledge or concerns. The hotline is monitored by Chief of Staff Richard Moore and his office phone number is 304-243-2888.
- 2.2.3 The employee who elects to act as a whistleblower is not responsible for investigating the activity or for determining fault or corrective measures. Supervisors and managers are required to report suspected violations to either Office of Human Resources, Compliance & Integrity or the Executive Administrator responsible for the department; the suspected violation will then be reported to the individual(s) in the University who has specific and exclusive responsibility for investigating all reported violations.
- 2.2.4 Insofar as possible, the confidentiality of the whistleblower will be maintained; however, the identity of the individual may need to be disclosed in the course of the investigation or to comply with the law.
- 2.2.5 The University will not retaliate against a whistleblower, including adverse employment actions. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.
- 2.2.6 An employee who intentionally files a false report of illegal, dishonest or fraudulent activity, misconduct, wrongdoing, financial Irregularities, or policy violations will be subject to discipline per the corrective discipline policy up to and including termination.

### 3.0 AUTHORIZATION

The Vice President of Human Resources & Compliance has the authority to change, modify or approve exceptions to this policy at any time with notice and with the approval of the Board of Trustees.