

NUMBER: E-6

TITLE: WHISTLEBLOWER POLICY

POLICY: The purpose of this whistleblower policy is to provide procedures for reporting unlawful or fraudulent activities and to protect Southern Nazarene University trustees, administrators, faculty and staff who make such reports. Southern Nazarene University requires its trustees, administrators, faculty and staff to observe a high standard of personal, business, and academic ethics. In observing those high ethical standards, all SNU personnel associated with SNU must act with honesty and integrity in carrying out their duties and responsibilities to ensure compliance with all applicable federal, state and local laws and regulations.

PROCEDURE:

Reporting

Individuals should report in writing their concerns under this policy with an individual who can address them properly. In most cases, the individual's supervisor is in the best position to address an area of concern. If an individual is uncomfortable making such a submission to his or her supervisor or is not satisfied with the response received from that supervisor, individuals should submit their concerns to the Vice President for Academic Affairs for academic related concerns and to the Vice President for Business and Financial Affairs for all other concerns.

Handling of Reported Violations

The Vice President for Academic Affairs or Vice President for Business and Financial Affairs will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) working days of receipt of the report. All reports will be promptly investigated and appropriate action will be taken in accordance with the results of the investigation.

No Retaliation

This policy is intended to encourage individuals to make reports of known or suspected unlawful or fraudulent activities. Any retaliation by SNU toward the initiator of any report made in good faith will not be tolerated. This includes harassment of any kind including threat of or action involving an adverse employment consequence. Any individual who retaliates against another individual as a result of a disclosure is subject to appropriate disciplinary action.

Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of unlawful or fraudulent activities. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

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.