



AURORA UNIVERSITY

HUMAN RESOURCES POLICY MANUAL

TOPIC: Whistleblower Policy
EFFECTIVE DATE: July 24, 2008
Approved By: Audit Committee of the Board of Trustees
Policy Number: 109

POLICY

Aurora University recognizes its obligation to its employees and constituents to maintain the highest ethical standards and to promote the university's core values of integrity, citizenship, continuous learning, and excellence. To protect the integrity of the university's learning community, and to ensure the highest standards of conduct by and among members of the university community, the university will investigate any alleged *Improper Activity* by its employees or trustees. Anyone found to have engaged in an improper activity is subject to disciplinary action by the university up to and including dismissal or expulsion, and civil or criminal prosecution when warranted.

All members of the university community are strongly encouraged to report any potential improper activity. The preferred method of reporting any issue of concern is for the employee, student, or other constituent to file a report describing the potential improper activity and the person or persons involved, with the Vice President for Finance or the Vice President & Chief Academic Officer at the George Williams College (GWC) campus of Aurora University. To initiate an investigation, the report should be in writing. The university may, in its discretion, investigate any report made orally that is subsequently not made in writing.

Once a report has been filed, the Vice President for Finance, Vice President & Chief Academic Officer at GWC or legal counsel shall undertake an investigation by appointing another administrator or other qualified person to conduct the investigation. The Vice President for Finance and/or Vice President & Chief Academic Officer at GWC may obtain the assistance of the university's attorneys or other qualified professionals in the investigation. The report and the identity of the person who filed the report will not be disclosed except when necessary for a full investigation of the report. The investigator shall file a written report of his/her findings with the Vice President for Finance, Vice President & Chief Academic Officer at GWC, or legal counsel within twenty (20) working days after the report has been made. If the investigatory report cannot be completed within this time frame, the report shall state the reasons for the delay. The person who filed the report will be notified of the findings of the investigation within ten (10) working days of its filing. A confidential summary of activity will be provided to the Audit Committee of the Board of Trustees on a regular and on-going basis, as appropriate.

The university will not tolerate any: 1) retaliatory actions against any employee or constituent for making a good faith report of a potential improper activity; or 2) direct or indirect use or attempted use of the *Official Authority or Influence* of an employee's position or office for the purpose of interfering with the right of another employee or constituent to make a *Protected Disclosure* directly to the university.

The university will take whatever action that may be necessary to prevent and correct violations of this *Whistleblower Policy*; notwithstanding the foregoing, any individual who files a *Baseless Allegation* shall not be protected under this policy.

DEFINITIONS

Improper Activity. Any activity undertaken by a university employee or trustee which is found, after due process, to be in violation of any applicable local, state, or federal law, rule, or regulation, or university policy or procedure, including, but not limited to, those relating to: corruption; malfeasance; bribery; theft; fraud; coercion; conversion; or misappropriation or misuse of assets.

Official Authority or Influence. Promising to confer or conferring, any benefit; effecting or threatening to effect, any reprisal; taking, or directing others to take, or recommending, processing, or approving, any personnel action, including, but not limited to, appointment, promotion, transfer, assignment, performance evaluation, suspension, or other disciplinary action.

Protected Disclosure. Any good faith communication that discloses or demonstrates an intention to disclose an alleged improper activity.

Baseless Allegation. Any allegation of improper activity made without reasonable cause to believe that the information disclosed is true. Individuals making such allegations may be subject to institutional disciplinary action and/or legal claims by individuals wrongfully accused of such conduct.

Contact Information:

Ms. Beth Reissenweber
Vice President for Finance
347 S. Gladstone Ave.
Aurora, IL 60506
630-844-5490
breissen@aurora.edu

Dr. William B. Duncan
Vice President & Chief Academic Officer
350 Constance Blvd.
Williams Bay, WI 53191
262-245-8514
wduncan@aurora.edu

Questions regarding this policy should be directed to Human Resources.