

STETSON UNIVERSITY

Reporting Potential Financial Misconduct

- I. Purpose and Overview:** Stetson University expects all members of the Stetson community to observe high standards of business and personal ethics in discharging their duties and responsibilities. This policy has been developed with these obligations in mind. This policy also is intended to encourage and enable individuals to raise serious concerns within Stetson University, and to define a process to address these concerns.
- II. Scope of Policy:** This policy covers instances in which an individual affiliated with the University — such as faculty, staff, or students — discovers or suspects financial misconduct, including but not limited to theft, fraud, embezzlement, kickbacks, diversion of University funds for personal use, or questionable financial practices. If an individual submits a report under this policy that is more appropriately addressed under a different policy, the report may be referred to the appropriate person or office for resolution.
- III. Reporting Violations and Suspected Violations:** All members of the Stetson community have a responsibility to report known or suspected financial misconduct in accordance with this policy. The University encourages individuals to share their questions, concerns, suggestions, or complaints regarding financial misconduct with someone who can address them properly. The University expects administrators such as department heads, deans, and members of the President’s Cabinet to maintain an open-door policy and to follow the processes in this policy when they receive a report concerning known or suspected financial misconduct.

 - A. Initial step:** In most cases, an employee should report the known or suspected misconduct to his or her supervisor or department head. Students are also encouraged to report known or suspected violations; student reports typically should be made to the head of Student Life at the student’s campus.
 - B. Alternative reporting options:** If the matter is not satisfactorily resolved at the initial step, or if the person to whom the initial report ordinarily would be made is involved in the known or suspected violation, concerns should be reported to the appropriate dean, director, vice president, or the President. If an employee or student is not comfortable reporting through normal University channels, he or she may convey concerns in writing to the University’s attorney, Mark G. Alexander with the firm Alexander DeGance Barnett, P.A., 225 Water Street, Suite 1200, Jacksonville, Florida 32202 or at mark.alexander@adblegal.com. The University’s attorney represents Stetson University and does not represent any individual administrators, faculty members, employees, students, or constituency groups in matters arising under this policy. The University attorney will transmit the written report directly to the chair of the University’s Trustee Audit Committee with a copy to the Chair of the Board of Trustees, and to the Vice

President for Finance and/or the President as appropriate if neither is implicated in the written report. Before taking further action, the Chair of the Trustee Audit Committee will then consult with appropriate University staff to determine the proper method of investigating the report.

- C. **Report contents:** Reports of known or suspected financial misconduct should contain the name and title of each employee or representative against whom any allegation is being made, and a specific description of the misconduct, including dates, times, and any other relevant information needed to substantiate the allegations. In addition, the person should describe how he or she learned this information, such as first-hand observation, a report from another person, etc.
- D. **Anonymity and requests for confidentiality:** A report may be made anonymously; however, it is critical that individuals reporting anonymously provide sufficient detail to permit an adequate investigation. In addition, a person may identify himself or herself but request that his or her identity, or details that would reveal his or her identity, be kept confidential. Confidentiality will be maintained to the extent feasible, given the need to conduct an adequate investigation.
- E. **Guidance for individuals who receive a report:** In all situations, an employee who receives a report alleging known or suspected financial misconduct must promptly notify the head of Human Resources for their specific campus, who in turn must notify the Vice President for Business and CFO.

IV. **Process for Handling Reported Violations**

- A. **Role of Human Resources and Vice President for Business and CFO:** The Office of Human Resources for the campus where the report is made is responsible for providing guidance to management, investigating all reported complaints and allegations concerning violations of this policy, confidential record-keeping, and advising the Vice President for Business and CFO of all reports and outcomes. Matters may be reassigned to another office or department for investigation when deemed appropriate by the Vice President for Business and CFO. The Vice President for Business and CFO will keep the President informed, and, where appropriate, the University's Trustee Audit Committee. The Vice President for Business and CFO has direct access to the Trustee Audit Committee and reports to that Committee at least annually on compliance activity.
- B. **Acknowledgement and investigation:** When the person reporting identifies himself or herself, the assigned investigator will promptly acknowledge receipt of the known or suspected violation and may also seek additional detail about the substance of the report. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. If the person reporting includes his or her identity, the assigned investigator will inform that

person when the investigation has been concluded. Due to the sensitive nature of such investigations, specific details might not be shared.

- V. **Confidentiality:** All aspects of any investigation under this policy will be kept confidential to the extent possible and reasonable in light of controlling laws and policies.

- VI. **No Retaliation:** Retaliation against anyone who in good faith makes a report or complaint under this policy is strictly prohibited. Retaliation can be reported under this policy in the same manner as financial misconduct. Good faith under this policy means that the individual submitting a report under this policy must have reasonable grounds for believing the information disclosed reflects a violation or suspected violation. Any member of the Stetson community who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, or if not an employee, other sanctions appropriate for the person's role or position.

Approved by the President's Cabinet on May 5, 2010; updated and approved by the Board of Trustees in June, 2011.