



## **ADELPHI UNIVERSITY WHISTLEBLOWER PLAN**

### **General Statement**

Adelphi University is committed to the highest possible standards of accountability in all its affairs. A “whistleblower” is a person who reports an activity that he/she considers to be illegal, fraudulent or dishonest.

Employees, Board members, committee members, students and volunteers are encouraged to report suspected illegal, fraudulent or dishonest conduct, (i.e., to act as a “whistleblower”), pursuant to the procedures set forth below.

### **Reporting**

To facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement or phone report may be made to NAVEX Global. NAVEX Global is a third-party service that operates a hotline that enables both web and phone reporting and allows employees, students, volunteers, vendors and other interested parties to report concerns regarding a wide range of suspected unethical behavior as outlined below. NAVEX Global may be contacted through a link on the University’s website ([www.adelphi.edu](http://www.adelphi.edu)). All reports are directed to the Office of Internal Audit and are addressed confidentially without identifying the reporter if requested.

### **Types of Reports**

Illegal, Fraudulent or Dishonest Conduct: A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- forgery or alteration of documents
- unauthorized alteration or manipulation of computer files
- fraudulent financial reporting
- pursuit of a benefit or advantage in violation of Conflict of Interest rules
- misappropriation or misuse of resources, such as funds, supplies or other assets
- authorizing or receiving compensation for goods not received or services not performed
- authorizing or receiving compensation for hours not worked

## **Rights and Responsibilities**

University Board Members and personnel are required to report the above dishonest conduct through the NAVEX Global portal.

Reasonable care should be taken to report such misconduct in good faith and to avoid:

- Baseless, false or malicious allegations
- premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- violations of a person's rights under law

Due to the important yet sensitive nature of suspected violations, effective professional follow-up is critical. Accordingly, any person who becomes aware of suspected misconduct should not contact the person suspected to further investigate the matter or demand restitution.

## **Investigation**

All relevant matters, including suspected but unproven matters, will be fully investigated. Appropriate corrective action will be taken, if necessary. Investigations may warrant outside assistance, such as auditors, attorneys and/or law enforcement.

## **Whistleblower Protection**

- Whistleblower complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with (i) those who have a need to know so that an effective investigation can be conducted and a determination made as to what action to take based on the results of any such investigation and (ii) in appropriate cases, with governmental and/or law enforcement personnel. Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may have a right to know the identity of the whistleblower and records and information maintained by the University and the whistleblower may be subject to disclosure.
- No employee may, with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment (including but not limited to threats of physical harm, loss of job, punitive work assignments or impact on salary or fees) retaliate against a whistleblower for good-faith disclosure of an activity which that person believes to be illegal, fraudulent or dishonest. If a whistleblower believes he/she has been retaliated against, he/she should inform the Director of Internal Audit immediately. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblower protection from retaliation applies to employees, Board members, committee members, students and volunteers.